



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
2056 WESTINGS AVENUE, SUITE 400  
NAPERVILLE, IL 60563-2657

January 31, 2025

Samer Salka, M.D.  
Radiation Safety Officer  
Premier Cardiovascular Specialists, P.C.  
20200 W Outer Dr.  
Dearborn, MI 48124

SUBJECT: PREMIER CARDIOVASCULAR SPECIALISTS, P.C. REQUEST FOR WRITTEN  
CONSENT TO DIRECT LICENSE TRANSFER

Dear Dr. Salka:

By letter dated August 5, 2024, with additional and clarifying information being provided in the letter dated July 29, 2025, Premier Cardiovascular Specialists, P.C. submitted to the U.S. Nuclear Regulatory Commission (NRC) a request for written consent to a direct transfer of control of U.S. NRC Materials License No. 21-32740-01. In accordance with Section 184 of the Atomic Energy Act of 1954, as amended (AEA), and [10 CFR §30.34](#), the U.S. NRC consents to the transfer.

Premier Cardiovascular Specialists, P.C., is authorized by the U.S. NRC to possess and use byproduct material under [10 CFR Part 30](#). By letter dated August 5, 2024, Premier Cardiovascular Specialists, P.C., requested written consent to the direct transfer of control of its license from the U.S. NRC. Because the license was issued under 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material," the U.S. NRC must find that the transfer is in accordance with the provisions of the AEA and, if so, must give its consent in writing prior to the transfer, in accordance with Section 184 of the AEA and [10 CFR §30.34\(b\)](#). Additionally, the U.S. NRC staff reviewed the direct transfer of control request using the guidance in NUREG-1556, Volume 15, Revision 1, "Consolidated Guidance About Materials Licenses – Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses," dated June 2016.

[10 CFR §30.34\(b\)](#) states:

- (1) No license issued or granted pursuant to the regulations in [parts 30] through 36, and 39 nor any right under a license shall be transferred, assigned or in any manner disposed of, either voluntarily or involuntarily, directly or indirectly, through transfer of control of any license to any person, unless the Commission shall, after securing full information, find that the transfer is in accordance with the provisions of the Act and shall give its consent in writing.
- (2) An application for transfer of license must include:
  - (i) The identity, technical and financial qualifications of the proposed transferee; and
  - (ii) Financial assurance for decommissioning information required by [10 CFR] §30.35.

As described in Agencywide Documents Access and Management System (ADAMS) accession numbers ML24218A156 and ML25031A066, the direct transfer of control will result from the direct acquisition and purchase of the assets of Premier Cardiovascular Specialists, P.C., by the Henry Ford Health System, d/b/a Henry Ford Health. Henry Ford Health System, d/b/a Henry Ford Health, will provide management services, including managing the licensee's day-to-day affairs, budgetary plans, operating plans, and policies and procedures. The U.S. NRC staff finds that the licensee request adequately provides a complete and clear description of the proposed transaction, consistent with [10 CFR §30.34\(b\)](#) and Chapter 5 and Appendix E of NUREG-1556, Vol. 15, Rev. 1. The sufficiency of the description is evaluated below.

The request for a direct transfer of control was posted for public comment on the U.S. NRC website for 30 days in accordance with 10 CFR Part 2, Subpart M, and as described in the U.S. NRC's Regulatory Issue Summary 2014-08, Revision 1. No comments were received from members of the public.

In the request for a direct transfer of ownership, Premier Cardiovascular Specialists, P.C. provided information regarding its current decommissioning funding plans. Based on the information provided, Premier Cardiovascular Specialists, P.C. is not required to have financial assurance for decommissioning because of the types and amount of material authorized in its license. The U.S. NRC staff finds that the licensee's request adequately provided information for financial assurance for decommissioning, consistent with [10 CFR §30.34\(b\)](#) and Chapter 5 and Appendix E of NUREG-1556, Vol. 15, Rev. 1.

Further, the U.S. NRC conducted an inspection of Premier Cardiovascular Specialists, P.C. on March 18, 2020, at its licensed facility located at 20200 W. Outer Dr., Dearborn, Michigan. The U.S. NRC identified no violations.

Additionally, as described in its request, Henry Ford Health System, d/b/a Henry Ford Health, commits that it:

- A. will not change the personnel involved in licensed activities;
- B. will not change the locations, facilities, and equipment authorized in the U.S. NRC license;
- C. will not change the radiation safety program authorized in the U.S. NRC license;
- D. will keep regulatory required surveillance records and decommissioning records.

Based on these commitments, the U.S. NRC staff find that the licensee request adequately documents the constraints, license conditions, requirements, representations, and commitments made by the transferee, consistent with [10 CFR §30.34\(b\)](#) and Chapter 5 and Appendix E of [NUREG-1556, Volume 15, Rev. 1](#).

Henry Ford Health System, d/b/a Henry Ford Health, holds U.S. NRC Materials License No. 21-04109-16, authorizing possession of byproduct material for diagnostic and therapeutic procedures. The U.S. NRC staff used the guidance provided by the NRC's Office of Nuclear Material Safety and Safeguards' "Checklist to provide a basis for confidence that radioactive materials will be used as specified on the application," January 29, 2019 revision. The purpose of this checklist is for the U.S. NRC to obtain reasonable assurance from new license applicants or U.S. NRC licensees transferring control of licensed activities that the licensed material will be

used for its intended purpose and not for malevolent use. Therefore, for security purposes, Henry Ford Health System, d/b/a Henry Ford Health, is considered a known entity because it has a current U.S. NRC Materials License.

An environmental assessment for this action is not required because this action is categorically excluded under [10 CFR §51.22\(c\)\(21\)](#).

The staff has reviewed the request for a direct transfer of control of U.S. NRC Materials License No. 21-32740-01. The U.S. NRC staff find that the direct transfer of control is in accordance with Section 184 of the AEA and 10 CFR §30.34(b) and consents to the transfer. Please note that you will need to notify us promptly, in writing, after the transaction has been finalized and include a signed copy of the sales agreement confirming completion of the transaction. If this planned sale has not been consummated within 30 days of the date of this letter, please notify us in writing.

Future changes in the licensee's name, licensed use, licensed materials, licensed location, persons responsible for licensed material, or other changes to the corporate organizational structure require submission of a request to amend the license or a request to transfer the license. U.S. NRC approval must be received prior to implementation of any such proposed change.

In accordance with [10 CFR §2.390](#), a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC website at <https://www.nrc.gov/reading-rm/adams.html>. If you have any questions regarding this letter, please contact me at (630) 829-9737 or via electronic mail at [Jason.Kelly@nrc.gov](mailto:Jason.Kelly@nrc.gov).

Sincerely,

Jason M. Kelly, MPH, CPH  
Health Physicist  
Materials Licensing Branch

Docket No.: 030-38009  
License No.: 21-32740-01  
Control No.: 642205