



February 12, 2026

Mr. Roberto Torres  
U.S. Nuclear Regulatory Commission  
Region IV  
1600 East Lamar Boulevard  
Arlington, Texas 76011-4511

**Re: Request Review for Indirect Change of Control - Hawai'i Pacific Health License No. 53-23297-01 and Honolulu Imaging Center LLC dba InVision Imaging License No. 53-29402-01**

Hawai'i Pacific Health ("HPH"), a Hawai'i nonprofit corporation, on behalf of itself and its majority owned subsidiary, Honolulu Imaging Center LLC dba InVision Imaging (collectively the "Licenses") and Hawai'i Medical Service Association, a Hawai'i mutual benefit society ("HMSA"), are submitting this application ("Application") to the U.S. Nuclear Regulatory Commission ("NRC") seeking the NRC's consent to an indirect transfer of control of two Radioactive Materials Licenses. HPH possesses Radioactive Materials License No. 53-23297-01, and its majority owned subsidiary possesses Radioactive Materials License No. 53-29402-01 (collectively the "Licenses").

This Application is necessitated by a corporate restructuring whereby HPH and HMSA will become affiliated under a newly formed Hawai'i nonprofit parent entity, One Health Hawai'i (the "Parent"), which will serve as the common parent organization for both entities (the "Transaction"). The Parent will provide certain governance and oversight of HPH and HMSA, while each entity will retain authority over its respective nondelegable legal, tax, regulatory obligations, and licensed activities. Upon consummation of the Transaction, which is expected to occur before the end of 2026, subject to receipt of required regulatory approvals and satisfaction of customary closing conditions, direct control over the respective Licenses will not change, and the Licenses will continue to be held by the respective Licensees.

HPH is the not-for-profit parent of a health care system in Hawai'i, which includes four hospitals and a network of doctors and specialists with a mission to create a healthier Hawai'i. Honolulu Imaging Center LLC d/b/a InVision Imaging is a provider of various imaging services, including

MRI, PET/CT, diagnostic CT, ultrasound, and x-ray. Invision Imaging is a majority owned indirect subsidiary of HPH.<sup>1</sup>

HMSA is a Hawai'i unincorporated nonprofit association and mutual benefit society that provides health insurance and related services in Hawai'i as a licensee of the Blue Cross and Blue Shield Association.

There will be no changes to either of the Licensees' operations, entity names, key operating personnel, or NRC licensed activities as a result of this Transaction. Further information regarding the Transaction is provided in Attachment 1, and simplified before and after organizational charts are provided in Attachment 2.

The closing of the Transaction is conditioned, among other things, on the filing of certain applications and notices with, and receipt of the relevant approvals, licenses, or consents from, applicable governmental authorities (collectively "Regulatory Approvals"). The Parties to the Transaction currently anticipate that, subject to the fulfillment or waiver of all remaining closing conditions, including obtaining the remaining Regulatory Approvals, the Transaction will close before the end of 2026. The Parties therefore respectfully request the NRC's review and its written consent to this planned indirect transfer of control.

If you have any questions or comments pertaining to this Transaction, please contact HMSA's counsel for nuclear regulatory matters, Adam Romney at Davis Wright Tremaine, LLP (206-757-8238 / [adamromney@dwt.com](mailto:adamromney@dwt.com)), Amy C. Roma, at Hogan Lovells US LLP (202-637-6831 / [amy.roma@hoganlovells.com](mailto:amy.roma@hoganlovells.com)) or Stephanie Fishman (202-637-3623 / [stephanie.fishman@hoganlovells.com](mailto:stephanie.fishman@hoganlovells.com)).

cc: NRC, Ms. Michelle Simmons  
NRC, Ms. Casey Alldredge  
Ronald W. Frick, CHP, Radiation Safety Officer

Enclosures: Attachment 1, NUREG-1556 (Vol. 15, Rev. 1), at Chapter 5 and Appendix E (Information for Transfer of Control Application)  
Attachment 2, Simplified Organizational Charts Describing the Transaction

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<sup>1</sup> Specifically, Hawai'i Pacific Health Partners, Inc. ("HPHPI") is a wholly owned subsidiary of HPH, and HPHPI owns 90.94% of the outstanding units of Honolulu Imaging Center LLC. The remaining 9.06% of outstanding units are held by Dr. Eric Hannum, a physician licensed to practice medicine in Hawai'i.

### HAWAI'I PACIFIC HEALTH AFFIRMATION

I, CHARLES R. CHING, do hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct: (1) I am the General Counsel of Hawai'i Pacific Health ("HPH"), (2) I am duly authorized to execute and file this certification on behalf of HPH, and (3) the statements set forth in the attached Application for Consent to Indirect Change of Control with Respect to the Radioactive Material License regarding HPH are true and correct to the best of my information, knowledge, and belief.

Hawai'i Pacific Health

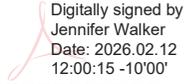
DocuSigned by:  
  
By: 0EA3CFEC02CC24CC  
Name: Charles R. Ching  
Title: Executive Vice President and  
General Counsel

Executed  
on: February 12, 2026

**HAWAI‘I MEDICAL SERVICE ASSOCIATION AFFIRMATION**

I, Jennifer Walker, do hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct: (1) I am the Executive Vice President, Chief Administrative Officer & General Counsel of Hawai‘i Medical Service Association (“HMSA”), (2) I am duly authorized to execute and file this certification on behalf of HMSA, and (3) the statements set forth in the attached Application for Consent to Indirect Change of Control with Respect to the Radioactive Material License regarding HMSA are true and correct to the best of my information, knowledge, and belief.

Hawai‘i Medical Service Association

By: **Jennifer Walker**  Digitally signed by  
Jennifer Walker  
Date: 2026.02.12  
12:00:15 -10'00'

Name: Jennifer Walker  
Title: Executive Vice President,  
Chief Administrative Officer &  
General Counsel

Executed  
on: February 12, 2026

## ATTACHMENT 1

### Information Required by NUREG-1556, Vol. 15

This Attachment follows the NRC Guidance provided in NUREG-1556, Vol. 15, Rev. 1, Consolidated Guidance About Materials Licenses: Guidance About Changes of Control and About Bankruptcy Involving Byproduct, Source, or Special Nuclear Materials Licenses (June 2016).

#### Description of the Transaction

The transaction involves a corporate restructuring whereby Hawai'i Pacific Health (“HPH”), a Hawai'i nonprofit corporation, on behalf of itself and its majority owned subsidiary, Honolulu Imaging Center LLC dba InVision Imaging (collectively the “Licenses”) and Hawai'i Medical Service Association, a Hawai'i mutual benefit society (“HMSA”) will become affiliated under a newly formed Hawai'i nonprofit parent entity, One Health Hawai'i (the “Parent”), which will serve as the common parent organization for both entities (the “Transaction”). HPH possesses Radioactive Materials License No. 53-23297-01, and its majority owned subsidiary possesses Radioactive Materials License No. 53-29402-01 (collectively the “Licenses”).

The Parent will provide certain governance and oversight of HPH and HMSA, while each entity will retain authority over its respective nondelegable legal, tax, regulatory obligations and licensed activities.

Upon consummation of the Transaction, which is expected to occur before the end of 2026, subject to receipt of required regulatory approvals and satisfaction of customary closing conditions, direct control over the respective Licenses will not change, and the Licenses will continue to be held by the respective Licensees.

HPH is the not-for-profit parent of a comprehensive health care system in Hawai'i, which includes four hospitals and a network of doctors and specialists with a mission to create a healthier Hawai'i. Honolulu Imaging Center LLC d/b/a InVision Imaging is a provider of various imaging services, including MRI, PET/CT, diagnostic CT, ultrasound, and x-ray. Invision Imaging is a majority owned indirect subsidiary of HPH.<sup>2</sup>

HMSA is a Hawai'i unincorporated nonprofit association and mutual benefit society that provides health insurance and related services in Hawai'i as a licensee of the Blue Cross and Blue Shield Association.

Simplified pre- and post-closing organizational charts are provided in Attachment 2 at the end of this document. Note, the Licensees' names, operations, and primary points of contact will not change as a result of the Transaction.

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<sup>2</sup> Specifically, Hawai'i Pacific Health Partners, Inc. (“HPHPI”) is a wholly owned subsidiary of HPH, and HPHPI owns 90.94% of the outstanding units of Honolulu Imaging Center LLC. The remaining 9.06% of outstanding units are held by Dr. Eric Hannum, a physician licensed to practice medicine in Hawai'i.

### **Changes of Personnel**

Following the Transaction, there are no planned changes to the personnel having control over licensed activities related to the Licenses.

### **Changes of Location, Equipment, and Procedures**

There are no changes to the Licensee locations, facilities, equipment, or procedures related to the Licenses arising from the Transaction.

### **Surveillance Records**

The status of the facilities, equipment, and radiation safety programs as they relate to the Licenses will not change in connection with the Transaction. There is no known contamination. Each Licensee will continue to maintain records of exports under the Licenses and will continue to comply with the record-keeping and reporting requirements of NRC regulations.

### **Decommissioning and Related Records Transfers**

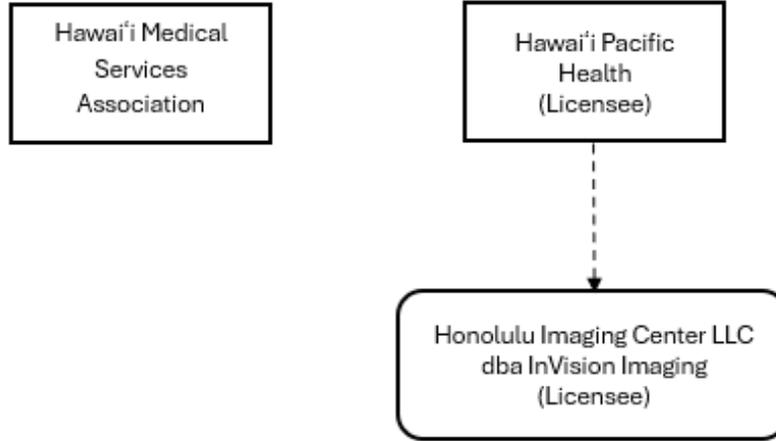
There are no NRC-mandated decommissioning obligations associated with the Licenses. Nonetheless, each Licensee will maintain its existing U.S. facilities and will continue to maintain the necessary records for the safe and effective decommissioning of its facilities in the same manner.

### **Transferee's Commitment to Abide by Transferor's Commitments**

The Transaction will not result in a change in either Licensee. Each Licensee will continue to meet its existing commitments under its respective License. Each Licensee further commits to continuing to meet its obligations under its License and will continue to accept full responsibility for open inspection items and any resulting enforcement action.

## ATTACHMENT 2

**Figure 1: Simplified Pre-Transaction Organizational Chart**



**Figure 2: Simplified Post-Transaction Organizational Chart**

