



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555 - 0001**

August 5, 2002

Lorraine Hellinghausen
Radiation Safety Officer
TRUGLO, Inc.
13745 Neutron Road
Dallas, Texas 75244

Dear Ms. Hellinghausen:

This letter is in reference to your application dated June 12, 2002, requesting a license for a device containing byproduct material. In order to continue our review, please provide the additional information listed in the Enclosure.

We will continue our review upon receipt of this information. If we do not receive a response from you in 30 days, we will consider your request as having been abandoned and void the active control for your request. This action would be without prejudice to the resubmission of another request.

If you have any questions, please contact me at (301) 415-7637, or John Jankovich at 301-415-7904.

Sincerely,
/RA/

Nima Ashkeboussi, Engineering Aide
Materials Safety and Inspection Branch
Division of Industrial and
Medical Nuclear Safety
Office of Nuclear Material Safety
and Safeguards

Enclosure: As stated

Please provide the following additional information to support your application dated June 12, 2002. All NRC guidance mentioned can be obtained at www.nrc.gov.

1. Tests

1. The prototype tests performed and the recorded results from 21st Century Technologies on their archery pin do not satisfy 10 CFR 32.22 (a)(2)(xi) and 10 CFR 32.22 (a)(2)(xii) for prototype procedure and results. Since TRUGLO's manufacturing is independent from 21st Century Technologies and 21st Century has no part in the manufacturing process, TRUGLO must perform prototype tests on TRUGLO products. Guidance can be received from NRC Report NUREG-1556 Volume 8, Appendix O, for gun sights. Please note that all tests listed in Appendix O may not be applicable for an archery sight.
2. Visual checks are not sufficient to ensure source integrity and safety. The quality assurance and control procedures listed in your application do not meet the requirements of 10 CFR 32.22 (a)(2)(xv). Leak tests should be performed on incoming sources and on outgoing devices. Please refer to 10 CFR 32.110 or to NRC Regulatory Guide 6.9 for sampling methods of incoming and outgoing products. You may also use accepted industry or military standards to select your sampling rate.

2. Clarifications

- 2.1 Please clarify the differences, if any, between the following devices mentioned on page 5 of your application: archery sight pin, aiming device, generic bow sights.
- 2.2 Please indicate the location of the label on the archery sight pin.
- 2.3 Please clarify the statement made in your application from Section 3, Part V, #1: "Sealed sources are inventoried manually and inspected for activity". Please describe what is meant by "inspected for activity"? Is this the isotope activity or the light activity?
- 2.4 Please provide the number of archery models and the extent of differences of the archery models in the TG-20 series.
- 2.5 Please submit any information regarding the statement made on page 8 through 9, "these test results were previously performed and submitted by 21st Century Technologies on behalf of TRUGLO..."

3. Additional Information Required

- 3.1 Please provide the maximum external radiation levels from 5 cm and 25 cm away per 10 CFR 32.22 (a)(2)(vi). Also, provide the test procedure and the method of analysis used.
- 3.2 The information provided for the radiation doses relevant to 10 CFR 32.23 and 32.24 is insufficient.
- 3.3 Page 7 of your application under labeling, an "Exhibit A" is referenced. This exhibit was not in the application. Please provide it.
- 3.4 Please provide the identity of the document listed on page 12 as Attachment K by referencing the author, report number, publication site, and date.
- 3.5 Please provide the average life for the illuminated sight for hunter's use.

ENCLOSURE

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