

September 14, 2004

Unison Industries  
ATTN: Bruce D. Markert, RSO  
7575 Baymeadows Way  
Jacksonville, Florida 32256

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION AND RECEIPT OF LICENSE  
RENEWAL APPLICATION (MAIL CONTROL NO. 022434, LICENSE NO. 09-  
23745-01E)

Dear Mr. Markert:

This is to acknowledge receipt of your application for renewal of the materials license identified above that indicated your intent to renew your license. Your application is deemed timely filed, and accordingly, the license will not expire until final action has been taken by this office. Renewal actions are normally processed within 180 days. Please retain this correspondence as documentation that your license remains in effect until the renewal process is completed. Any correspondence regarding your renewal application should reference the mail control number specified above. We find that the following additional information is needed in support of your request.

1. NRC regulations at 10 CFR 32.16 provides that licensees maintain records of transfer of material and report to the Director of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, DC 20555, with a copy to the appropriate NRC Regional Office listed in appendix D of part 20 of this chapter, within 30 days after filing an application for renewal of the license. The report must include the following information and must cover the period between the filing of the preceding report to a current date. If no transfers of byproduct material have been made during the reporting period, the report must so indicate:
  - a. A description or identification of the type of each product;
  - b. For each radionuclide in each type of product, the total quantity of the radionuclide; and
  - c. The number of units of each type of product transferred during the reporting period.

It appears the transfer reports for the period July 1, 1997 to June 30, 1999, were lost or not filed. Please submit a report covering the missing period.

2. NUREG-1556, Vol. 8, "Program-Specific Guidance About Exempt Distribution Licenses," indicates in Section 8.8, that, "Representatives signing an application must be authorized to make binding commitments and to sign official documents on behalf of the applicant." Please confirm that the Radiation Safety Officer has this authority.

3. The quantity of krypton-85 in electron tubes is limited to 30 microcuries pursuant to 10 CFR 30.15(a)(8)(iv). Please confirm that your electron tubes and spark gaps will contain no more than 30 microcuries of krypton-85.
4. Prototype testing and results are required for electron tubes pursuant to 10 CFR 32.14(b)(4). Please demonstrate that you have complied with this provision of the regulations.

NOTE: We are returning the sections of your application containing the drawings, except the first one showing a representative label (10-187610, Spark Gap), Resumes, Training, and Facilities. This information is not needed for the exempt distribution license.

NUREG 1556, Vol. 8, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Exempt Distribution Licenses," available on the Nuclear Regulatory Commission's web site at: <http://www.nrc.gov/NRC/NUREGS/SR1556/V8Final/index.html>, provides additional details describing the information you need to submit with license applications. NRC's regulations are available at: <http://www.nrc.gov/reading-rm/doc-collections/cfr/>. Please be sure the information required by 10 CFR 32.14, and as further detailed in NUREG-1556, Vol. 8, particularly Appendix J, is provided in your renewal.

In accordance with 10 CFR 2.790 of NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

We will continue our review on receipt of your response. We request that you submit your response to this letter within 30 calendar days from the date of this letter. Please refer to the docket and control number specified below. If you have questions or require clarification on any of the information stated above, you may contact me at (301) 415-6140 or E-mail: [www.ask@nrc.gov](mailto:www.ask@nrc.gov).

Sincerely,

**/RA/**

Anthony S. Kirkwood  
Materials Safety and Inspection Branch  
Division of Industrial and  
Medical Nuclear Safety  
Office of Nuclear Material Safety  
and Safeguards

Mail Control No. 022434  
Docket No. 030-31066  
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