

Appendix 6

**Certification of Application/License Review
for Part 32 Exempt Distribution Licenses**

Amendment No.: New Mail Control No.: 022617 to 022637*
 License No.: 24-326⁷⁵64-02E Expiration Date: 2017
 Docket No.: 030-375⁶⁷68 Program Code: 03250
 Licensee Name: Ideal Source ~~Quality Assurance International~~, LLC
 Address: 1309 Overhill Ct, 55 West 9th St, 17th Floor
NYC, NY 10018 Columbia, MO 65203

Action Type: New License
 New License/Licensee Renewal
 Product Transfer Report
 Amendment
 Termination

I certify that I have reviewed the licensee's request dated 7/13/07, as supplemented by any letters referenced in the license and in accordance with guidance provided by the Office of Nuclear Material Safety and Safeguards, appropriate Standard Review Plans and regulations, and the attached checklist.

REVIEWER	DATE
<u>A. Kirkwood</u>	<u>10/29/07</u>
REVIEWED BY	DATE
<u>Anthony S. Kirkwood</u>	
PERSON SIGNING THE LICENSE	DATE

* 022617
 GENERAL COMMENTS: a VOID, 10/18/07, as problems issuing E-license to NYC and distribution by another company in Mo. MC 022637, 32675 inst. code, 030-37567 docket no., and Missouri mailing address changed - other submitted technical information remains the same.

Mail Control No.: 022617

32.11: EXEMPT CONCENTRATIONS (30.14)

(a) Applicant satisfied general requirements in 30.33, 10 CFR Part 30

COMMENTS: Application with Region III.

(b) Provides a description of the product, including:

1. The product of material into which byproduct material will be introduced

COMMENTS: Topaz p. 8, C. 2) a.

2. Intended use of the byproduct material and the product or material into which it is introduced

COMMENTS: Gemstone distribution
p. 8, C. 2) b.

3. Method of introduction

COMMENTS: 1) neutron 2) neutron electron 3) electron only
p. 8, C. 2) c.

4. Initial concentration of byproduct material in the product or material

COMMENTS: Partial p. 4, p. 8, 2) d. As high as 20 times
30-70 limits

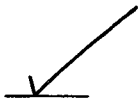
5. Maximum concentration of the radioisotopes in the product or material at the time of transfer to persons exempt from licensing

COMMENTS: Partial p. 4. Regs "exemption" from 1 in 1000
limit in APP R for small stones (see license APP H).

6. Control methods to assure that no more than the specified maximum concentration is in the product at the time of transfer

COMMENTS: Partial pp 6-7, Section B. 2) d.; Section C, 2) f;

7. Estimated time interval between introduction and transfer of the product or material



COMMENTS: C, 2) g: 45 days to 2 years, p. 9

(c) Provides reasonable assurance of the following:

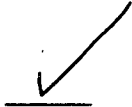
1. Concentrations of byproduct material at time of transfer will not exceed the concentrations in §30.70



COMMENTS: Partial pp. 4 + 5, C, 3) a, p. 10

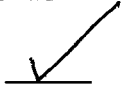
Sample must agree w/exporter or cessation

2. Reconcentration of the byproduct material in concentrations exceeding those specified in §30.70 is not likely



COMMENTS: C, 3) b, p. 10

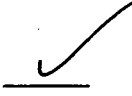
3. Use of lower concentrations is not feasible



COMMENTS: C, 3) c, p. 10

Decay time of 2 years not acceptable to market stores successfully.

4. The product or material is not likely to be incorporated in any food, beverage, cosmetic, drug or other commodity or product designed for ingestion or inhalation by, or application to, a human being



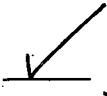
COMMENTS: C, 3) d, p. 10; unlikely. Commission

exclusion from requirement not for human adornment.

(d) Applicants must submit information on Quality Assurance (QA) Program, including:

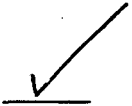
COMMENTS: P. 10-13, 10; Also App. A (exemption for small stores requested to 1 in 1000 limit)

1. Describe radiation detection equipment and shielding used to identify and quantify the radioactivity induced in the product or material



COMMENTS: Partial p. 5; Importer p. 10, f. App. A (proprietary)

2. Specify the frequency, standards and procedures used to calibrate such radioactive detection equipment



COMMENTS: App. A, D.2.

3. Describe counting procedures and how external measurements are converted to concentration values in terms of microcuries per gram

COMMENTS: P. 12, E., 2, need more details, e.g., activity? ✓
See 10/31/07, letter.

- P. 12, E., 1., requests exemption from administrative restrictions.
- App. A. asked to be Proprietary (10 CFR 2.390, affidavit needed)

P. XV, "Procedure @ importation", a., verify 5% of parcels are not fewer than 5 parcels per (intended) shipment. 1 kg lot on less of single site, shape, origin, + local history, divided into 20 g bottles for measurement

P. XVIii, Requested exemption, to not include stones < 0.2 g (1 count) in 1/1000 limit. Guidance only.