



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555 - 0001

June 4, 2010

Jenbo USA, LLC
ATTN: Mr. Kevin Ho, RSO
3672 Edison Way
Fremont, CA 94538

Mail Control No. 022831

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT
DISTRIBUTION LICENSE

Dear Mr. Ho:

This refers to your Application for Material License, NRC Form 313, and letter dated May 17, 2010. We do not have sufficient information to complete the review of your application. In order to continue our review we ask that you provide the following additional information:

- 1) Please provide a signed and dated original of NRC Form 313. For item 2, enter the company name rather than the contact person. For future reference, please note that since items 7 through 11 of NRC Form 313 pertain to possession and use license and are not applicable to the exempt distribution license, applicants should only complete items 1 through 6, 12 and 13 on the application form itself.
- 2) Title 10, Code of Federal Regulations, Section 32.14(b)(1) requires that the applicant submit information regarding the maximum quantity of byproduct material in each product. Your response to Item 5 indicated a maximum activity of 0.86 microcuries per bulb, and that the warehouse stores no more than 250 "bulb units" at any given time. Please confirm that the units are microcuries and that a "bulb unit" consists of just one bulb.
- 3) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Please provide details of construction and design of each product.
- 4) Title 10, Code of Federal Regulations, Section 32.14(b)(3) requires that the method of containment or binding of the radioactive byproduct material in the product be described. Please provide the method of containment or binding of the radioactive byproduct material in the product.
- 5) Title 10, Code of Federal Regulations, Section 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. Please provide these procedures and describe the prototype testing performed on the product.

- 6) Title 10, Code of Federal Regulations, Section 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet.
- 7) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor and the byproduct material in the product. Please describe the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor and the byproduct material in the product.
- 8) Title 10, Code of Federal Regulations, Section 32.14(b)(7) requires that the radiation level and the method of measurement for products for which limits on levels of radiation are specified in § 30.15; 10 CFR 30.15(a)(8) specifies such limits for electron tubes. Please provide this information.
- 9) Title 10, Code of Federal Regulations, Section 32.14(d) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe how the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling.
- 10) Title 10, Code of Federal Regulations, Section 32.15(a)(1) requires that each person licensed under § 32.14 shall maintain quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product.
- 11) Title 10, Code of Federal Regulations, Section 32.15(a)(3) requires that each person licensed under § 32.14 shall visually inspect each unit in inspection lots. Any unit that has an observable physical defect that could affect containment of the byproduct material shall be considered as a defective unit. Please describe how you shall visually inspect each unit in inspection lots for defects.
- 12) Title 10, Code of Federal Regulations, Section 32.15(c) requires that no person licensed under § 32.14 shall transfer to other persons for use under § 30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under § 30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product.

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information.

In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter 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).

Any correspondence regarding your amendment application should reference the control number specified above.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Licensing Branch
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

Docket No. 030-38293

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DATE	June 4, 2010			