

**From:** [Kralian, Mark A.](#)  
**To:** [Struckmeyer, Richard](#)  
**Subject:** RE: Questions concerning your license amendment request  
**Date:** Thursday, September 27, 2012 2:30:09 PM

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Mr. Struckmeyer,

Thank you for the review of our license amendment application. I have reviewed your comments and I agree with Mr. Haines' request. Please remove the following items from our August 9, 2012, amendment request for license no. 12-04933-06E.

5081025 (set of 10, I125 tubes)  
5081225 (set of 12, I125 tubes)  
5081525 (set of 15, I125 tubes)  
5081625 (set of 16, I125 tubes)  
5082025 (set of 20, I125 tubes)  
5082525 (set of 25, I125 tubes)

5080229 (set of 2, I129 tubes)  
5080329 (set of 3, I129 tubes)  
5080429 (set of 4, I129 tubes)  
5080529 (set of 5, I129 tubes)  
5080629 (set of 6, I129 tubes)  
5081029 (set of 10, I129 tubes)  
5081229 (set of 12, I129 tubes)  
5081529 (set of 15, I129 tubes)  
5081629 (set of 16, I129 tubes)  
5082029 (set of 20, I129 tubes)  
5082429 (set of 24, I129 tubes)  
5082529 (set of 25, I129 tubes)

Please contact me if there are any other questions that arise from your review.

Mark A. Kralian, CHP  
Radiation Safety Officer  
Perkin Elmer, Inc.  
617-350-9215 office  
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[mark.kralian@perkinelmer.com](mailto:mark.kralian@perkinelmer.com)

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**From:** Struckmeyer, Richard [mailto:Richard.Struckmeyer@nrc.gov]  
**Sent:** Monday, September 17, 2012 2:24 PM  
**To:** Kralian, Mark A.

**Subject:** Questions concerning your license amendment request

Mr. Kralian:

You may be aware of my recent exchange of emails with Mr. Haines at the PerkinElmer facility in Downers Grove.

I wrote to him in reference to his letter of August 9, 2012, that indicated the supplier of exempt-level tube type calibration sources had been changed.

I initially told Mr. Haines that I wanted to understand the meaning of the "Total Activity per P/N ( $\mu\text{Ci}$ )" for I-125 and I-129 in the table on page 2 of his letter because I believed that most of the products in the table appeared to exceed the exempt-quantity limits in 10 CFR 30.71 for these radionuclides (1  $\mu\text{Ci}$  and 0.1  $\mu\text{Ci}$ , respectively). After taking a second look at the information Mr. Haines provided, I saw that the sources that exceed the exempt-quantity limits in 10 CFR 30.71 for I-125 and I-129 are actually sets of sources. However, 10 CFR 32.19(b) states, in part: "Each quantity of byproduct material set forth in § 30.71, Schedule B of this chapter shall be separately and individually packaged. No more than 10 such packaged exempt quantities shall be contained in any outer package for transfer to persons exempt pursuant to § 30.18 of this chapter."

Your exempt-distribution license amendment application (also dated August 9, 2012) lists similar sets of sources which would seem to be "not authorized" under 10 CFR 32.19(b).

In my emails to Mr. Haines, I stated: "If you have documentation from a previous license application, amendment, or renewal that provides an explanation, I would appreciate your making this known." Apparently he and others at the Downers Grove facility found no such documentation. Mr. Haines subsequently replied with a request that we "...strike the following I125 and I129 part number multiple set quantities from the previously provided renewal submission list, because these will be obsoleted and no longer be ordered from our supplier, or distributed by our supplier or PerkinElmer to our customers - effective immediately."

5081025 (set of 10, I125 tubes)  
5081225 (set of 12, I125 tubes)  
5081525 (set of 15, I125 tubes)  
5081625 (set of 16, I125 tubes)  
5082025 (set of 20, I125 tubes)  
5082525 (set of 25, I125 tubes)

5080229 (set of 2, I129 tubes)  
5080329 (set of 3, I129 tubes)  
5080429 (set of 4, I129 tubes)  
5080529 (set of 5, I129 tubes)  
5080629 (set of 6, I129 tubes)  
5081029 (set of 10, I129 tubes)  
5081229 (set of 12, I129 tubes)  
5081529 (set of 15, I129 tubes)  
5081629 (set of 16, I129 tubes)  
5082029 (set of 20, I129 tubes)

5082429 (set of 24, 1129 tubes)

5082529 (set of 25, 1129 tubes)

If you agree with Mr. Haines' request, please provide a response that specifically states which items should be removed from your August 9, 2012, amendment request for license no. 12-04933-06E. This can be done by responding by email, or, if you prefer, you can send a letter, or resubmit your request as a new complete package. Any of these is acceptable.

Please keep in mind that I will still need to review the remaining material in your request, and that this review may lead to additional questions in the form of a Request for Additional Information.

Thank you,

Richard K. Struckmeyer  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials and Environmental Management Programs  
U.S. Nuclear Regulatory Commission  
301-415-5477