

**Kime, Traci**

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**From:** Lorraine Hellinghausen <lhellinghausen@truglo.com>  
**Sent:** Thursday, December 06, 2012 7:56 PM  
**To:** Struckmeyer, Richard  
**Subject:** RE: NRC License No. 42-23889-01E Renewal Application

Dear Mr. Struckmeyer:

In reference to our telephone conversation on Monday, please accept the following as confirmation of our discussion.

1. TRUGLO's intention regarding the submitted documents you have in your possession is to reply to the exempt-distribution license renewal using the second approach listed below:  
*Review the current license to determine if it accurately represents the current radiation safety program and the products currently distributed, and submit an application that identifies any necessary additions, deletions, or other changes.*
2. We fully agree that the current license accurately represents the current radiation safety program and the products currently distributed by TRUGLO, Inc.
3. Furthermore, contained in the application for your convenience marked by the use of "blue" ink are any updates to the currently used Quality Assurance Program for TRUGLO, Inc. which has been previously approved by the U.S.N.R.C. Specific sections containing the referenced updates are: Seciton 1.E.- U.S. Nuclear Regulatory Control Contact Info; Section VII – Production Procedures and Processes; Section IX – Non-Conforming Materials.

Please let me know if I may be of any further assistance.

Thank you in advance for your time and consideration.

Kindest regards,  
Lorraine Hellinghausen  
Radiation Safety Officer  
TRUGLO, Inc.  
972-774-0300 ext. 113

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**From:** Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]  
**Sent:** Monday, December 03, 2012 10:02 AM  
**To:** Lorraine Hellinghausen  
**Subject:** NRC License No. 42-23889-01E Renewal Application

Ms. Hellinghausen:

Your license renewal application was assigned to me. I have only had time to take a quick look so far, and am not prepared to send a formal Request for Additional Information (if necessary). However, to get started, I would like to clear up one matter.

As you most likely are aware, Section 12 of NUREG-1556, Volume 8, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Exempt Distribution Licenses," includes guidance concerning exempt-distribution license renewal. It indicates that licensees may choose to take one of three approaches when requesting license renewal:

- Submit an entirely new application for renewal as if it were an application for a new license, without referring to previously submitted information; or

- Review the current license to determine if it accurately represents the current radiation safety program and the products currently distributed, and submit an application that identifies any necessary additions, deletions, or other changes; or
- Review the documents submitted to the NRC in the past to determine if the information is up to date and accurately represents the current licensed activities and products. Identify in the application, by date, those documents that are applicable and those that are out-of-date or superseded, and indicate any changes necessary to reflect the current program.

Normally when we see that a license has become difficult to follow and understand exactly what is authorized (due to numerous amendments and changes to the license), we have determined that a complete, up-to-date renewal application should be submitted. It appears that this was your intention given the documentation you provided. However, we request that you either confirm this, or indicate which of the other choices is applicable.

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