

**From:** [Gary Yoshioka](#)  
**To:** [Struckmeyer, Richard](#)  
**Cc:** [John O. Gomez](#); [Alvaro M. Herrera](#)  
**Subject:** RE: Waiting for information concerning renewal of exempt-distribution license  
**Date:** Tuesday, October 01, 2013 11:26:17 PM

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Good morning Richard,

I would be happy to explain. We manufacture seven (7) standard sizes of spark gaps, thus to best respond to marking/labeling concerns, we propose to address parts without marking constraints due to size (Group 1) separately from parts with marking constraints due to size (Group 2). The following table summarizes the changes.

Group	Teledyne Reynolds Spark Gap Series	Marking		Labeling (On Bag)		Explanation
		Existing Method	Proposed Method	Existing Method	Proposed Method	
Group 1	DKF, DCF, MLF, MLT	Part Number, <b>[Teledyne Logo]</b> , Date Code, <b>"H3"</b>	Part Number, <b>"TELEDYNE"</b> , Date Code, <b>"TRITIUM"</b>	No requirements	No requirements	Marking: Replaced [Teledyne Logo] with full word "TELEDYNE"; Replaced "H3" with full word "TRITIUM" No requirements on bag label since marking on part meets minimum requirements
Group 2	MLH, MCF, MCH	Part Number, <b>[Teledyne Logo]</b> , Date Code, <b>"H3"</b>	Unchanged due to space constraints	No requirements	Add label primary package (individual, heat-sealed bag) for each part which states: Part Number, <b>"TELEDYNE"</b> ,	Due to size constraints, direct marking on part is unchanged. To meet the requirement, each part will be sealed in an individual bag with a label stating Part

					Date Code, "TRITIUM"	Number, "TELEDYNE", Date Code, "TRITIUM".
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Hopefully this summary is clear. If you have any more questions, please let me know.

Gary S. Yoshioka, P.E.  
Product Line Manager, Ceramics Department  
**TELEDYNE REYNOLDS, Inc.**  
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**From:** Struckmeyer, Richard [mailto:Richard.Struckmeyer@nrc.gov]  
**Sent:** Tuesday, October 01, 2013 7:31 AM  
**To:** Gary Yoshioka  
**Cc:** John O Gomez; Alvaro M. Herrera  
**Subject:** RE: Waiting for information concerning renewal of exempt-distribution license

Mr. Yoshioka:

Can you explain how your proposed method for marking and labeling is different from what is currently being done? I might be missing something, but I don't see the difference, if there is any. I may not have read it thoroughly enough because I am pressed for time due to my work on several other licenses and other projects.

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

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**From:** Gary Yoshioka [mailto:Gary.Yoshioka@Teledyne.com]  
**Sent:** Monday, September 30, 2013 5:24 PM  
**To:** Struckmeyer, Richard  
**Cc:** John O Gomez; Alvaro M. Herrera  
**Subject:** RE: Waiting for information concerning renewal of exempt-distribution license

Hello Richard,

I wanted to update you on the status of a forthcoming amendment request to Teledyne Reynolds' Exempt Distribution License No. 04-1682-01E. This amendment will include a proposal for marking and labeling of our spark gaps that we hope will address any concerns with respect to the requirements of 10CFR 32.14(b)(6).

I've attached a copy of our proposal for marking and labeling of our tritium-containing spark gaps. This proposal has been reviewed internally here as well as by our health physicist consultant. If you are receptive to doing so, I would welcome any input you have on the proposal before our submittal of the amendment. I think any input you might have would be very valuable.

Thank you for your time and attention in this matter.

Gary S. Yoshioka, P.E.  
Product Line Manager, Ceramics Department  
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**From:** Gary Yoshioka  
**Sent:** Wednesday, September 18, 2013 7:43 AM  
**To:** 'Struckmeyer, Richard'  
**Cc:** John O Gomez; Alvaro M. Herrera  
**Subject:** RE: Waiting for information concerning renewal of exempt-distribution license

Richard,

As we discussed this morning, Alvaro Herrera will be the point of contact effective immediately for anything concerning the license. You can also contact me for any issues if Al is not available. Here is the contact information for each of us:

Alvaro (Al) Herrera, EH&S Manager  
[aherrera@teledyne.com](mailto:aherrera@teledyne.com)  
(310)823-5491 x248

Gary Yoshioka, Product Line Manager  
[gyoshioka@teledyne.com](mailto:gyoshioka@teledyne.com)  
(310)823-5491 x246

Concerning the marking on the spark gaps, I apologize for the delay, but I want to stress that we at Teledyne have been working internally to determine our approach for resolving the concerns with the marking and labeling on the parts. This includes reviewing our proposal with the Senior Director for Environmental, Health and Safety for Teledyne. I have forwarded a proposal to the Senior Director as well as my General Manager today for final review. Everyone involved here at Teledyne is aware of the urgency of this issue.

I will keep you updated as we progress. Please do not hesitate to contact Al or myself with any questions. Thanks.

Gary S. Yoshioka, P.E.  
Product Line Manager, Ceramics Department

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**From:** Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]  
**Sent:** Tuesday, September 17, 2013 6:57 AM  
**To:** Daniel A. Cadena  
**Subject:** Waiting for information concerning renewal of exempt-distribution license

Mr. Cadena,

I received a call from someone at Teledyne in early-to-mid August concerning the issue of labels on your electron tubes. Unfortunately I am unable to find that person's name. I understood that he would follow up with more information as to how the labeling requirements will be met.

I hope you know who that person was, and will please ask him to get in contact with me by phone or email. I believe it would be advantageous to all concerned to move forward on your license renewal amendment request.

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