DIAMOND GROUND PRODUCTS

"The Tungsten Electrode Experts"

13 February 2015

RE: US NRC (Xu, S. correspondence of 26 January 2015) request for additional information per 10 CFR 40.52

I. Description of Material Source
   a. Origin
   b. Packaging
II. Product form (individual)
   a. Packaging
   b. Identification
III. Warehouse storage
   a. Location
IV. Packaging components
   a. Cardboard box type
   b. Labeling
   c. Comments on dimensions and weight
V. Radiological considerations
   a. Test equipment
   b. Calibration status
VI. Documentation
   a. MSDS
   b. Certificates of Conformance

1/5

2651 Lavery Court • Newbury Park, CA 91320 • Tel: 805-498-3837 • Fax: 805-498-9347
www.diamondground.com • sales@diamondground.com

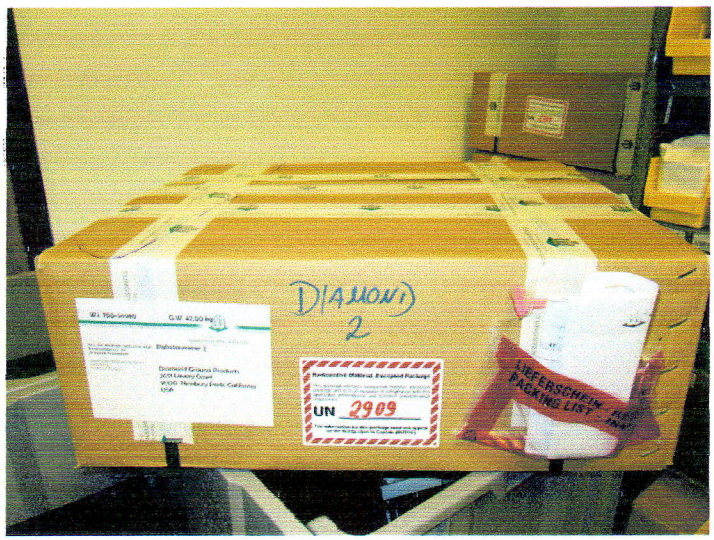
DIAMOND GROUND PRODUCTS

"The Tungsten Electrode Experts"

I. Description of Material Source

a. All material containing thorium oxide (Th2O2) imported by Diamond Ground Products, Inc. comes from either Germany or China. For all material received, thorium does not exist in the free state but as an alloying element in a tungsten base. Please refer to attachment AWS/ANSI document A5.12M_2009 (PDF) for reference.

b. Typical packaging as received from manufacture is shown with UN 2909 identification (20" x 17" x 7", source: GERMANY):



II. Product form (individual) "What Diamond Ground, Inc. distributes"

a. Individual TIG welding electrode packages measure 8" x 2" x ¼" as shown in attachment TIG_PACKAGING (PDF).

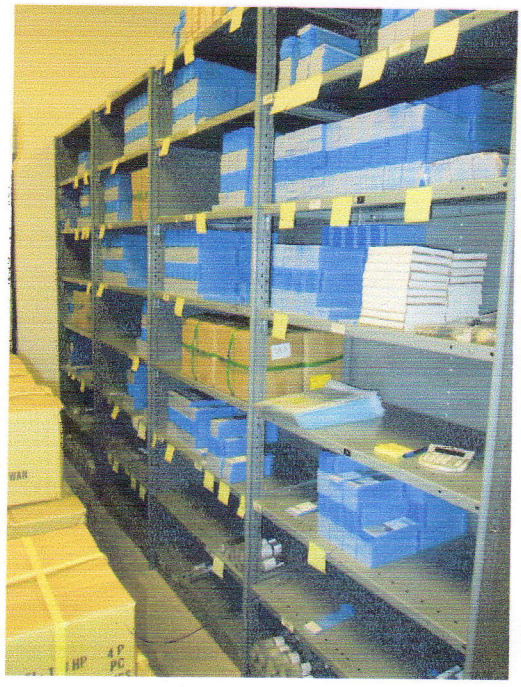
b. Document TIG_PACKAGING(PDF) shows typical form commonly shipped to customer. Page 1: Left box/package is Wolfram (German sourced) material for contracts requiring Defense Federal Acquisition Regulations compliance (15%). Middle box/package marked RADNOR is China sourced and labeled specifically according to customer's request and branding (Airgas / RADNOR) (15%). Right box/package marked Diamond Ground represents the majority or all shipments bearing company labeling (70%). Page 2: Back of box with warning labels.

III. Warehouse storage

a. Controlled (locked with limited access) warehouse storage shown (two leftmost and far right shelves are nonradioactive (non-thorium oxide) material:

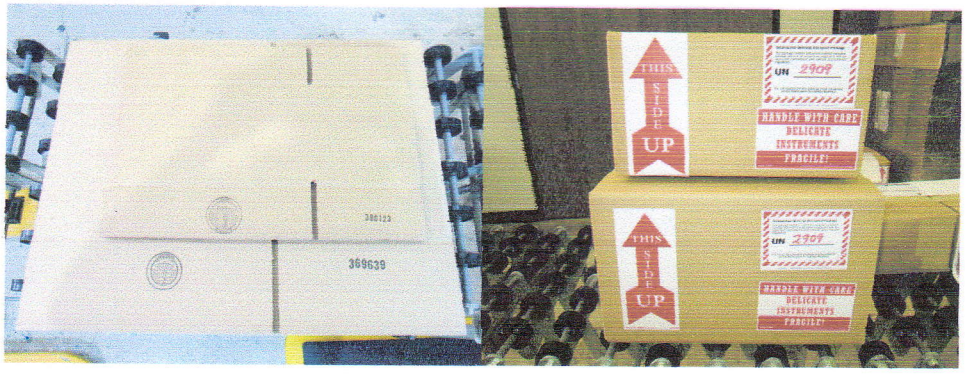
2/5

2651 Lavery Court • Newbury Park, CA 91320 • Tel: 805-498-3837 • Fax: 805-498-9347
www.diamondground.com • sales@diamondground.com



IV. Packaging components (shipping)

a. Double wall cardboard boxes and Styrofoam peanut buffer material is used when packaging TIG welding electrode boxes (Section II. Above)

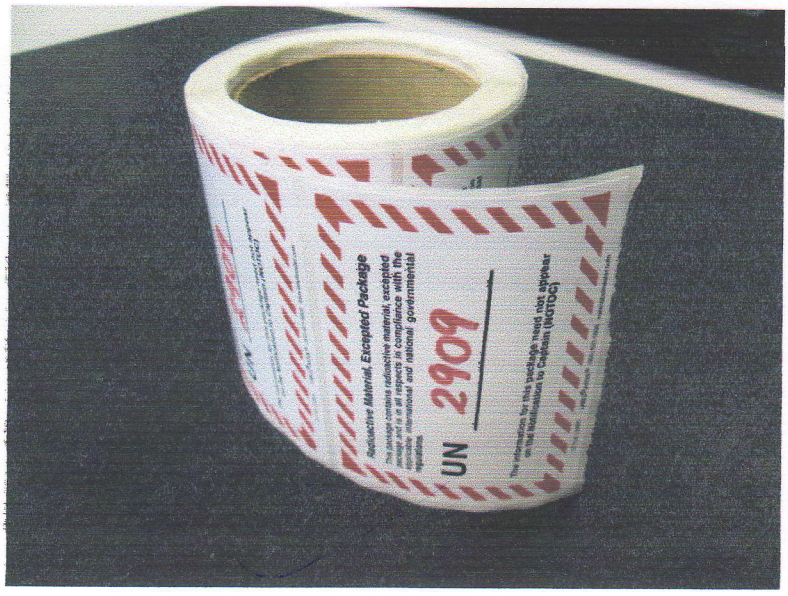


(Un-assembled) (Completed or ready-to-ship)

(Top, 12" x 6" x 6", Bottom, 14" x 10" x 8")

b. Labeling identifying UN 2909 is used for all packages containing thorium material:

3/5

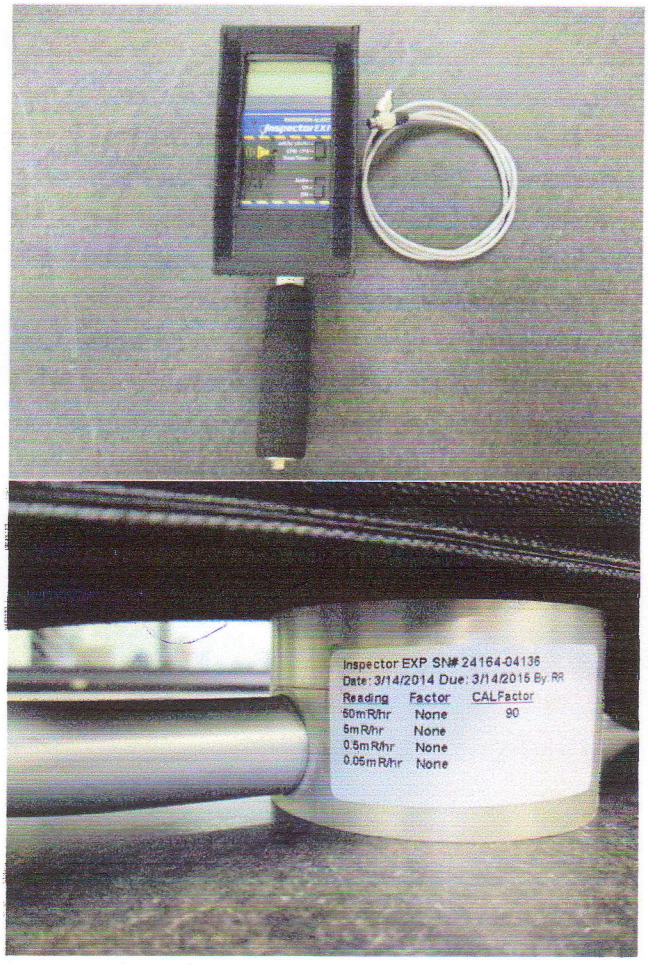


c. Depending on TIG electrode diameter and density, weight per cardboard box will vary but all radiological measurements will be less than maximum DOT threshold of .5 mR/hr due to established packaging guidelines developed internally.

V. Radiological considerations

a. All out going packages is scanned at surface for DOT max emission compliance .5mR/hr. Device used is a SE International Radiation Alert Inspector EXP+.

4/5



b. Device is currently calibrated and due for calibration on 03/14/2015 (see photo above).

VI. Documentation

a. All material is accompanied by MSDS documentation from both Diamond Ground products, Inc. and the source. Refer to DGP-MSDS-TIG_N (PDF) and DGP-MSDS_TIG-W (PDF) for reference.

b. All material shipped is accompanied by Certificates of Conformance identifying material type. Refer to DGP-CoC_DFAR (DFAR German source requirement) and DGP_CoC_STD (PDF) for all others as reference.

T. M

5/5