



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

July 1, 2015

White Stagg, LLC  
ATTN: Donald M. Clarke  
Radiation Safety Officer  
520-B Eagleton Downs Drive  
Pineville, NC 28134

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING WHITE STAGG,  
LLC APPLICATION FOR A NEW EXEMPT DISTRIBUTION LICENSE

Dear Mr. Clarke:

This letter refers to your application dated June 19, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML15181A060, for a new Nuclear Regulatory Commission (NRC) Exempt-Distribution Materials License. In reviewing your application, we have determined additional information is required to complete our review.

The intention of this request is to have all of the information required by the regulations in 10 CFR 32.14, "Certain items containing byproduct material; requirements for license to apply or initially transfer," and described in the relevant guidance document NUREG-1556 Volume 8 titled "Program-Specific Guidance about Exempt Distribution Licenses." Please provide the following information:

1. In your letter dated June 19, 2015, you stated that White Stagg LLC submitted a license application to the State of North Carolina. Please submit a copy of the North Carolina license as soon as it is issued. Please note that the NRC will not issue the exempt distribution license until you provide a copy of your North Carolina license.
2. Please provide the chemical and physical form and maximum quantity of byproduct material in each product.
3. Please provide a detailed description of construction and design of each product. Provide drawings that describe the construction aspects of the product including components of the product, material of construction, dimensions, assembly methods, and source containment and shielding. Particularly, these drawings should show the locations of the sources.
4. Please provide the method of containment or binding of the byproduct material in the product.

5. Please provide a proposed method of labeling or marking each unit, and its point-of-sale package so that:
- a. Each detector has a durable, legible, readily visible label or marking on the external surface of the detector containing:
    - i. The following statement: "CONTAINS RADIOACTIVE MATERIAL";
    - ii. The name of the radionuclide and the quantity of activity; and
    - iii. An identification of the person licensed under 10 CFR 32.14 to transfer the detector for use under 10 CFR 30.15(a)(7) or equivalent regulations of an Agreement State.
  - b. The labeling or marking specified in (5)(a) shall be located where it will be readily visible when the detector is removed from its mounting.
  - c. The external surface of the point-of-sale package shall have a legible, readily visible label or marking containing:
    - i. The name of the radionuclide and quantity of activity;
    - ii. An identification of the person licensed under 10 CFR 32.14 to transfer the detector for use under 10 CFR 30.15(a)(7) or equivalent regulations of an Agreement State; and
    - iii. The following or substantially similar statement: "THIS DETECTOR CONTAINS RADIOACTIVE MATERIAL. THE PURCHASER IS EXEMPT FROM ANY REGULATORY REQUIREMENTS."

Any correspondence regarding your application should reference the control number specified below. Please submit the requested information within 30 days of the date of this letter. If we have not received complete information within 30 days of the date of this letter, we will assume that you do not wish to pursue your application.

Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

In accordance with 10 CFR 2.390 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).

D. Clarke

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If you have any questions, please contact me at (301) 415-6004 or electronic mail:  
[Hector.Rodriguez-Luccioni@nrc.gov](mailto:Hector.Rodriguez-Luccioni@nrc.gov).

Sincerely,

***/RA/***

Hector Rodriguez-Luccioni, Ph.D.  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 030-38849  
Mail Control No. 587206

If you have any questions, please contact me at (301) 415-6004 or electronic mail: [Hector.Rodriguez-Luccioni@nrc.gov](mailto:Hector.Rodriguez-Luccioni@nrc.gov).

Sincerely,

**/RA/**

Hector Rodriguez-Luccioni, Ph.D.  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 030-38849  
Mail Control No. 587206

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| <b>NAME</b> | Hector Rodriguez-Luccioni | Shirley Xu     | Hipolito Gonzalez | Hector Rodriguez-Luccioni |
| <b>DATE</b> | 06/30 /2015               | 06/30 /2015    | 06/30 /2015       | 07/01/2015                |

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