

From: [Marathon|Sylvia Wein](#)
To: [Reber, Eric](#)
Cc: [Marathon|Nancy Mcknight](#); jcalce@susquehannahealth.org
Subject: [External_Sender] RE: 2014 Exempt Distribution Report; Marathon Watch Company LTD: License No. 54-28526-01E
Date: Tuesday, August 04, 2015 10:19:36 AM
Attachments: [image003.png](#)
[image004.png](#)
[2014 Shipments.xls](#)
[Summary for 2014.xls](#)

Dear Eric :

In response to your email dated July 27 below, please find attached our reporting figures for the year 2014. These were sent to our Radiation Safety Officer but not sent to your office. In future we will send these reports to both you and Dr. Calce.

If you require any further information, please do not hesitate to contact Nancy McKnight as she is my assistant.

Thank you,

Marathon Watch Company Ltd.

Sylvia Wein,
Comptroller

www.MarathonWatch.com | sylvia@marathonwatch.com
10-30 Mural Street, Richmond Hill, ON, L4B 1B5

Phone: 905-764-9420 | **Toll Free:** 1-800-822-4329 | **Fax:** 905-764-0035



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From: Reber, Eric [mailto:Eric.Reber@nrc.gov]

Sent: Monday, July 27, 2015 5:44 PM

To: Marathon | Sylvia Wein

Subject: 2014 Exempt Distribution Report; Marathon Watch Company LTD; License No. 54-28526-01E

Dear Ms. Wein,

All holders of exempt distribution materials licenses are required to submit annual reports of their distribution of exempt products by January 31 of each year for the preceding year. From a review of our records it appears that you have not submitted a report of the distribution of exempt products under License No. 54-28526-01E for 2014. If you have already submitted such a report or believe that you are not required to submit such a report, please inform me. If you have already submitted a report, please send me a copy of the report so that I can verify that it is in our system. Otherwise, you should submit your report without delay. Information concerning the requirements for such reports is provided below.

License No. 54-28526-01E authorizes the distribution of exempt products pursuant to 10 CFR 32.22. The record keeping and reporting requirements for such licenses are located in 10 CFR 32.25(c). The reporting requirements are detailed and prescriptive and should be followed fastidiously.

32.25(c) [Licensees shall] Maintain records of all transfers and file a report with the Director of the Office of Nuclear Material Safety and Safeguards by an appropriate method listed in § 30.6(a) of this chapter, including in the address: ATTN: Document Control Desk/Exempt Distribution.

(1) The report must clearly identify the specific licensee submitting the report and include the license number of the specific licensee.

(2) The report must indicate that the products are transferred for use under § 30.19 of this chapter or equivalent regulations of an Agreement State.

(3) The report must include the following information on products transferred to other persons for use under § 30.19 or equivalent regulations of an Agreement State:

(i) A description or identification of the type of each product and the model number(s);

(ii) For each radionuclide in each type of product and each model number, the total quantity of the radionuclide;

(iii) The number of units of each type of product transferred during the reporting period by model number.

(4)(i) The licensee shall file the report, covering the preceding calendar year, on or before January 31 of each year. In its first report after December 17, 2007, the licensee shall separately include data for transfers in prior years not previously reported to the Commission.

(ii) Licensees who permanently discontinue activities authorized by the license issued under § 32.22 shall file a report for the current calendar year within 30 days after ceasing

distribution.

(5) If no transfers of byproduct material have been made under § 32.22 during the reporting period, the report must so indicate.

(6) The licensee shall maintain the record of a transfer for one year after the transfer is included in a report to the Commission.

Further information about the requirements that apply to annual reports of exempt distribution can be found in the attached Regulatory Issue Summary.

A hard copy of your revised report should be addressed and sent to:

ATTN: Document Control Desk/Exempt Distribution
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Please be aware that upon your request, proprietary information submitted to the NRC may be withheld from public disclosure. To do this, you must follow the procedures in 10 CFR 2.390(b) including requesting withholding at the time the information is submitted and complying with the document marking and affidavit requirements set forth in 10 CFR 2.390 (b)(1).

If you have any questions, please feel free to contact me.

Regards,
Eric

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