

From: [Markert, Bruce \(Unison, US\)](mailto:Markert.Bruce@unison.us)
To: Reber, Eric
Cc: [Becker, Eric \(Unison, US\)](mailto:Becker, Eric (Unison, US)); [Griggs, Matthew \(Unison, US\)](mailto:Griggs, Matthew (Unison, US))
Subject: RE: Request for resubmittal of report of 2014 exempt distribution
Date: Friday, March 13, 2015 9:12:44 AM
Attachments: [15-BDM-letter03.pdf](#)

Eric,

An electronic copy of the revised report is attached with the original heading to the Director.

Regards,

Bruce Markert

Unison Industries
Consulting Engineer / Radiation Safety Officer
T +1 904 739 4258
www.unisonaviation.com
7575 Baymeadows Way
Jacksonville, FL 32256 USA
Unison Industries, LLC

From: Reber, Eric [<mailto:Eric.Reber@nrc.gov>]
Sent: Thursday, March 12, 2015 12:02 PM
To: Markert, Bruce (Unison, US)
Subject: RE: Request for resubmittal of report of 2014 exempt distribution

Dear Mr. Markert,

Thank you for getting back to me with the information.

You may be interested to know that it is no longer required that you send your report to the regional NRC offices.

I look forward to your revised report.

Regards,
Eric

From: Markert, Bruce (Unison, US) [<mailto:Bruce.Markert@unisonindustries.com>]
Sent: Thursday, March 12, 2015 8:33 AM
To: Reber, Eric
Subject: RE: Request for resubmittal of report of 2014 exempt distribution

Mr. Reber,

The difference in reported content is because the actual quantity of radioactive material is different.
Unison-Jacksonville manufactures/distributes 21 unique spark gap part numbers, ranging from 0.038

to 4.03 μCi Kr-85 radioactivity.

The spark gaps required of Unison-Norwich involve only one part number with a Kr-85 radioactivity of 0.0977 μCi .

When reviewing my data from 2014, I discovered that the actual quantity of spark gaps leaving Jacksonville was "triple reported" in the report supplied by Unison's production department. I have confirmed that the actual number of spark gaps leaving Jacksonville was "approximately" one-third of the originally-reported quantity. I say "approximately" because I do not double-count the spark gaps that Unison-Jacksonville ships to Unison-Norwich as the USNRC considers Norwich to be the original point of distribution in this case. The number of spark gaps shipped from Norwich in 2014 is correct at 57 pieces.

I will make this correction in addition to the items mentioned in your e-mail. In reading RIS 2014-10, I will also break down the report to show quantities of each unique spark gap part number shipped, with individual radioactivity in addition to total per part number and grand total.

I will also place you on copy when the revised report (electronic) is sent to the Regional offices. I understand that the original hard-copy report will go to Washington, DC.

Respectfully submitted,

Bruce Markert

Unison Industries

Consulting Engineer / Radiation Safety Officer

T +1 904 739 4258

www.unisonaviation.com

7575 Baymeadows Way

Jacksonville, FL 32256 USA

Unison Industries, LLC

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

Sent: Wednesday, March 11, 2015 4:59 PM

To: Markert, Bruce (Unison, US)

Subject: Request for resubmittal of report of 2014 exempt distribution

Dear Mr. Markert,

I've reviewed your exempt distribution report dated January 13, 2015.

Please revise and resubmit your report to indicate that the products are transferred for use under 10 CFR 30.15, giving the specific paragraph designation (for example, 10 CFR 30.15(a)(8) for electron tubes), or equivalent regulations of an Agreement State.

Also, please review your calculations concerning the amount of radioactive material per

spark gap to ensure that they are accurate. Based on the information provided, the spark gaps distributed from your Jacksonville facility contained approximately 0.84 uCi/spark gap; the spark gaps distributed from your Norwich facility contained 0.088 uCi/spark gap. This difference in the reported content of radioactive material may be because the actual quantities of radioactive material are different or it may result from a mistake in your calculations.

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

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

Regards,
Eric

Eric H. Reber
General Engineer/Project Manager
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal, and Rulemaking Programs
US Nuclear Regulatory Commission
Washington, DC 20555-0001
Tel: +1 (301) 415-5608
Office: T-8i04