

**From:** [Brian Christopher](#)  
**To:** [Reber, Eric](#)  
**Subject:** [External\_Sender] RE: RE: MS SEDCO Report of distribution of exempt products for 2014  
**Date:** Monday, July 27, 2015 10:56:31 AM  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[2014 Exempt Distribution Transfer Report \(13-2601-02E\) NRC.pdf](#)

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Eric,

I have made the changes and will send a hard copy out today.

Thank you for all your help,

Brian

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**From:** Reber, Eric [mailto:Eric.Reber@nrc.gov]  
**Sent:** Monday, July 27, 2015 10:19 AM  
**To:** Brian Christopher  
**Subject:** RE: RE: MS SEDCO Report of distribution of exempt products for 2014

Hello Mr. Christopher,

Your report looks good except for two regulatory references.

Here is how the sentences should read:

As per 10 CFR 32.16, we are required to submit a report ...

These products are transferred for use under 10 CFR 30.15(a)(7)

Please make these corrections when you submit the hard copy of the report.

Thank you,  
Eric

Eric H. Reber  
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Materials Safety Licensing Branch  
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US Nuclear Regulatory Commission  
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Tel: +1 (301) 415-5608  
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**From:** Brian Christopher [<mailto:bchristopher@mssedco.com>]

**Sent:** Monday, July 27, 2015 9:45 AM

**To:** Reber, Eric

**Subject:** [External\_Sender] RE: MS SEDCO Report of distribution of exempt products for 2014

Eric,

I have attached a copy of the report you requested on Friday July 24 2014 to this e-mail for review.

I will be sending out the hard copy of this letter to:

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

Best regards,

**Brian Christopher**

Director of Sales & Technical Services

AAADM Certified

General Radiation Safety IRSC Certified

IMSA Sustaining Member

IMSA Work Zone Temporary Traffic Control Technician

IMSA Traffic Signal Technician Level I

IMSA Traffic Signal Field Technician Level II

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**From:** Reber, Eric [<mailto:Eric.Reber@nrc.gov>]  
**Sent:** Friday, July 24, 2015 5:07 PM  
**To:** Brian Christopher  
**Subject:** MS SEDCO Report of distribution of exempt products for 2014

Dear Mr. Christopher,

As we discussed, 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. 13-26301-02E 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. 13-26301-02E authorizes the distribution of exempt products pursuant to 10 CFR 32.14. The record keeping and reporting requirements for such licenses are located in 10 CFR 32.16. The reporting requirements are detailed and prescriptive and should be followed fastidiously.

*10 CFR 32.16 Certain items containing byproduct material: Records and reports of transfer.*  
*(a) Each person licensed under § 32.14 shall maintain records of all transfers of byproduct material 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 § 30.15 of this chapter, giving the specific paragraph designation, or equivalent regulations of an Agreement State.*

*(b) The report must include the following information on products transferred to other persons for use under § 30.15 or equivalent regulations of an Agreement State:*

*(1) A description or identification of the type of each product and the model number(s), if applicable;*

*(2) For each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide; and*

*(3) The number of units of each type of product transferred during the reporting period by model number, if applicable.*

*(c)(1) 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.*

*(2) Licensees who permanently discontinue activities authorized by the license issued under § 32.14 shall file a report for the current calendar year within 30 days after ceasing distribution.*

*(d) If no transfers of byproduct material have been made under § 32.14 during the reporting period, the report must so indicate.*

*(e) 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

Eric H. Reber  
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US Nuclear Regulatory Commission  
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