

From: Reber, Eric
To: ["Larry Webb"](#)
Cc: [julie_stansberry](#); [andrew_cordell](#); [home_webb](#)
Subject: RE: Re: 2014 Exempt Distribution Report; Spectrum Techniques, Inc. License No. 41-23845-01E
Date: Thursday, July 30, 2015 4:38:00 PM

Dear Mr. Webb,

I'm not sure why your report is not in our system. I searched many different ways and could not find it.

Please revise and resubmit your report. In doing so, please address these issues that were identified during a review of your report:

- In accordance with 32.20(b)(2), the report must indicate that the materials are transferred for use under § 30.18 or equivalent regulations of an Agreement State.
- In accordance with 10 CFR 32. 20(b), 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

- The report you provided indicates that 0.8 uCi of U-238 was distributed under your license in 2014. Your license authorizes distribution of licensed material to persons exempt from licensing pursuant to 10 CFR Part 30.18. The exemption in 10 CFR 30.18 only applies to persons who possess individual quantities, each of which does not exceed the applicable quantity set forth in 10 CFR 30.71, Schedule B. U-238 is not listed in 10 CFR 30.71, Schedule B. Please provide further details regarding the distribution of U-238 in 2014 and, if applicable, an alternate regulatory analysis.

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
Mail Stop: T-8E24

From: Larry Webb [mailto:larry@spectrumtechniques.com]

Sent: Thursday, July 30, 2015 2:12 PM

To: Reber, Eric

Cc: julie stansberry; andrew cordell; home webb

Subject: [External_Sender] Re: 2014 Exempt Distribution Report; Spectrum Techniques, Inc. License No. 41-23845-01E

Dear Mr. Reber,

Yes, I mailed the report January 7, 2015.

I have attached a copy of the report.

If an hard copy is required, please let me know and I will mail a copy.

Larry Webb

SPECTRUM TECHNIQUES, LLC

106 Union Valley Road

Oak Ridge, TN 37830

PHONE: (865) 482-9937

FAX: (865) 483-0473

www.spectrumtechniques.com

larry@spectrumtechniques.com

----- Original Message -----

From: Reber, Eric

To: larry@spectrumtechniques.com

Sent: Monday, July 27, 2015 6:00 PM

Subject: 2014 Exempt Distribution Report; Spectrum Techniques, Inc. License No. 41-23845-01E

Dear Mr. Webb,

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. 41-23845-01E 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. 41-23845-01E authorizes the distribution of exempt products pursuant to 10 CFR 32.18. The record keeping and reporting requirements for such licenses are located in 10 CFR 32.20. The reporting requirements are detailed and prescriptive and should be followed fastidiously.

32.20 Same: Records and material transfer reports.

(a) Each person licensed under § 32.18 shall maintain records of transfer of material identifying, by name and address, each person to whom byproduct material is transferred for use under § 30.18 of this chapter or the equivalent regulations of an Agreement State and stating the kinds, quantities, and physical form of byproduct material transferred.

(b) The licensee shall file a summary 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 materials are transferred for use under § 30.18 or equivalent regulations of an Agreement State.

(c) For each radionuclide in each physical form, the report shall indicate the total quantity of each radionuclide and the physical form, transferred under the specific license.

(d)(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 the total quantity of each radionuclide transferred for transfers in prior years not previously reported to the Commission.

(2) Licensees who permanently discontinue activities authorized by the license issued under § 32.18 shall file a report for the current calendar year within 30 days after ceasing distribution.

(e) If no transfers of byproduct material have been made under § 32.18 during the reporting period, the report must so indicate.

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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