

From: Reber, Eric
To: "[Colar, Charles](#)"
Subject: RE: RE: Second Revision of Sony Electronics exempt distribution report
Date: Thursday, August 06, 2015 7:40:00 AM

Dear Mr. Colar,

As I wrote in my previous email, the second revision of your report should include a statement similar to this one:

The electron tubes for which distribution is authorized under License No. 04-23948-01E are transferred for use under 10 CFR 30.15(a)(8), or equivalent regulations of an Agreement State.

As I wrote before, your revised report does not include, for each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide. Instead, your report indicated that your products will contain *no more than 0.27 microcuries (10 Mbq) of Krypton-85*. Please revise your report, in accordance with 10 CFR 32.16 (b) (2), to include, for each radionuclide in each type of product and each model number, if applicable, the *total quantity of the radionuclide*, i.e., NOT the maximum. Here is an example of an acceptable format for providing this information.

2014 Distribution			
Electron Tube Model Number	Kr-85 per unit [uCi]	Units distributed	Kr-85 Distributed [uCi]
XYZ-1	0.25	10	2.5
XYC-3	0.20	100	20.0
Total	N/A	110	22.5

If you have further questions, please let me know.

Regards,
Eric

From: Colar, Charles [mailto:Charles.Colar@am.sony.com]
Sent: Tuesday, August 04, 2015 8:46 PM
To: Reber, Eric
Subject: [External_Sender] RE: Second Revision of Sony Electronics exempt distribution report

Dear Mr. Reber,

Hope all is well. Could you please send me an example of the format that you need for the Exempt Distribution report. Am not totally gasping how I should be reporting this information based on the new changes in the regulations.

Also each lamp contains a maximum of 0.27 microcurie of kr-85. This is what is stated in the MSDS. If you need additional information on the quantity I will need see if we have more specific data on the quantity of kr – 85.

Kind Regards,

Charles Colar
Facilities Manager
Sony Carson Logistics Center
310.522.6804 (w)
310.221.2440 (m)
310.522.6899 (f)
charles.colar@am.sony.com

From: Reber, Eric [<mailto:Eric.Reber@nrc.gov>]
Sent: Tuesday, July 28, 2015 7:14 AM
To: Colar, Charles
Subject: RE: Second Revision of Sony Electronics exempt distribution report

Dear Mr. Colar,

I don't think that you have responded to this email. Could you please revise and resubmit your revised report. Please let me know when that will take place.

Thank you,
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: Reber, Eric
Sent: Tuesday, May 26, 2015 8:01 AM
To: charles.colar@am.sony.com
Subject: Second Revision of Sony Electronics exempt distribution report

Dear Mr. Colar,

As we discussed on February 4, 2015, and as described in my email to you dated [March 12, 2015](#), certain aspects of your exempt distribution report dated January 5, 2015 do not meet the applicable requirements in 10 CFR 32.16. In response, you provided a revised report dated May 11, 2015. Complete information that is required by the regulations in 10

CFR 10 CFR 32.16 has not been provided in your original and revised reports. Please revise and resubmit your revised report and specifically address the following two issues:

1. Your revised report does not indicate, as required by 10 CFR 32.16(a)(2), 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. Your report only indicates that the products were distributed *pursuant to 10 CFR 30.15*. In the revision to your report, please provide the *specific paragraph number*.
2. Your revised report does not include, for each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide. Instead, your report indicated that your products will contain *no more than 0.27 microcuries (10 Mbq) of Krypton-85*. Please revise your report, in accordance with 10 CFR 32.16 (b)(2), to include, for each radionuclide in each type of product and each model number, if applicable, the *total quantity of the radionuclide*, i.e., NOT *the maximum*.

If these requests are not clear, please contact me.

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
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