

From: Reber, Eric
To: "[Leif Vasstrom](#)"
Subject: RE: Supplemental Exempt Distribution Report 04-23959-01E Supra Brands 2014
Date: Friday, August 07, 2015 5:47:00 PM
Attachments: [image001.jpg](#)

Dear Mr. Vasström,

I have reviewed the documents you sent to me via email dated August 7, 2015. Please revise and resubmit your report to address the following issues:

In accordance with 10 CFR 32.16(b)(2), you are required to provide, for each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide. This information was not provided in the email that you sent. Please revise and resubmit your report to include, by model number, the total quantity of radionuclide distributed.

Also, in accordance with 10 CFR 32.16(b)(3), you are required to provide the number of units of each type of product transferred during the reporting period by model number, if applicable. You provided a listing of products distributed, but it is not possible to determine which of the products contain radioactive material, or which products correspond to the various lamp body types in the other table you sent. Please revise your report to include the number of units of each type of product transferred by model number and please only include model numbers that contain radioactive material.

For your information, the information concerning models and quantities of Kr-85 distributed described in the preceding two paragraphs could be provided in a simple table like this in which I've entered fictitious numbers:

2014 Distribution of Kr-85 lamps			
Lamp Body	Number Distributed	uCi/lamp	Total Distributed/model [uCi]
Type		Maximum Activity	
250W	13	0.015001	0.20
400W	25	0.033003	0.83
500W	126	0.032154	4.05
600W	45	0.049738	2.24
800W	26	0.113825	2.96
1000W	38	0.118164	4.49
Total			14.76

Please include all required information in a hard copy of your revised report that is 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

In the post script of this email I have provided the section of the regulations with your reporting requirements.

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
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P.S.:

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.

From: Leif Vasstrom [mailto:leif.vasstrom@gmail.com] **On Behalf Of** Leif Vasstrom

Sent: Friday, August 07, 2015 2:18 PM

To: Reber, Eric

Subject: [External_Sender] Supplemental Exempt Distribution Report 04-23959-01E Supra Brands 2014

Dear Mr. Reber,

Please find enclosed supplemental answers to our 2014 report filed on January 21 and on April 6 and August 6, 2015.

1. Two attachments are also enclosed, an excel sheet and a PDF:
 - Specific details on lamps including KR-85 activity.
 - A corrected Summary Report of all Lamps sold in 2014

2. Per 30.15

All products are sold and distributed through our distribution system to Distributors and Tanning Salons exempt from licensing, pursuant to Section 30.15 10CFR Part 30, or equivalent provisions of the regulations of any Agreement State.

3. Please note also that all 2000 watt lamps contain no nuclides of any form.

I hope that this supplemental report is sufficient to finish the report for 2014.

Please note also that we will not be a direct importer for further lamps from Hungary.

Leif Vasström


<http://tantoday.com/forums/images/ads/supra-728x90.jpg>



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