

From: Reber, Eric
To: ivasstrom@supratechnologies.com
Cc: sales@suprabrands.com
Subject: Request for revised Exempt Distribution Report 04-23959-01E Supra Brands
Date: Monday, April 06, 2015 8:26:00 AM
Attachments: [RIS 2014-10 Exempt Distribution.pdf](#)

Dear Mr. Vasstrom,

I've reviewed your exempt distribution report dated January 21, 2015.

Please revise and resubmit your report to address the reporting requirements listed in my previous email dated March 27, 2015 (included below). You should ensure that you specifically address the following issues.

- Your license authorizes distribution of products under 10 CFR 32.14 with corresponding reporting requirements that are only found in 10 CFR 32.16. In your report you referenced the reporting requirements in 10 CFR 32.12. Please address only the reporting requirements in 10 CFR 32.16 in your revised report.
- Your revised report must 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.
- Your revised report must provide a description or identification of the type of each product and the model number(s), if applicable. In your report you wrote, "KR-85 – Is part of a sealed source in all models, except 2000w lamps, models Q-PI2RH and QA lamps. The products are used as replacement lamps for suntanning equipment throughout the USA." The first sentence is unclear. You write that KR-85 is part of a sealed source in all models except for certain models. But, you don't address the form of Kr-85 in the exceptions. You also write that your products are "used as replacement lamps". Are they, in fact, all replacement lamps? Please provide clear and unambiguous statements that include a description or identification of the type of each product and the model number(s), if applicable.
- Your revised report should include, for each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide. In your report you wrote, "Krypton 85 nuclide does not exceed 120 nanocuries per lamp." The reporting requirements apply to the actual quantity of radioactive material – not a maximum -- in each type of product and each model number. In your revised report, you must specify actual quantities of Kr-85 in each type of product and each model number.
- In the Sales by Item Summary that was attached to your report, the quantities are listed with two significant digits. Assuming that your products are sold as discrete quantities, it seems that there would be no need for two significant digits. Please address this issue in your revised report.
- Your revised report must include the number of units of each type of product transferred during the reporting period by model number. The Sales by Item Summary that you provided is somewhat unclear on this point. It seems that it may be an inventory report rather than a distribution report; or at a minimum, it seems to include inventory information. For example, "Quartz Inventory" is written near the top of the report and "Total Quartz Inventory" appears to be the bottom line of the report. Please address this issue in the revision to your report.

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

From: Reber, Eric
Sent: Friday, March 27, 2015 12:29 PM
To: 'lvasstrom@supratechnologies.com'
Cc: 'sales@suprabrands.com'
Subject: Exempt Distribution Report 04-23959-01E Supra Brands

Dear Mr. Vasstrom,

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. 04-23959-01E 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. 04-23959-01E 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

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