

From: [Reber, Eric](#)
To: George.Gleason@BrukerDetection.us
Subject: Request for second revision of exempt distribution report dated December 31, 2014
Date: Monday, April 06, 2015 10:43:00 AM
Attachments: [RIS 2014-10 Exempt Distribution.pdf](#)

Dear Mr. Gleason,

I've reviewed your revised exempt distribution report dated December 31, 2014, which updated your original report that was also dated December 31, 2014.

Please revise and resubmit your revised report to address the following issues.

- In your revised report, you wrote, "All item [sic] were transferred under 10 CFR 30.20." This statement appears to be incorrect. Condition 9 of License No. 20-23465-02E authorizes Bruker to distribute products pursuant to 10 CFR 32.26 and 10 CFR 32.18. In your second revised report, please amend this sentence to include the correct citation(s).
- In your revised report in the second table titled, Calibration Source, you indicated that Cs-137 sources were transferred under 10 CFR 30.20. This is incorrect. Conditions 9.B-O of License No. 20-23465-02E authorize Bruker to distribute counting standards pursuant to 10 CFR 32.18 to persons exempt from licensing pursuant to 10 CFR 30.18. The second table in your second revised report should indicate that these products are transferred for use under 10 CFR 30.18 or equivalent regulations of an Agreement State.
- In your revised report, you wrote, "The total activity of exempt Ni-63 sealed sources transferred under 10 CFR 32.20 in year 2014 was 26700MBq." Conditions 6.A, 7.A, 8.A., 9.A and 10 of License No. 20-23465-02E concern the authorization of the distribution of products containing Ni-63 pursuant to 10 CFR 32.26 to persons exempt from licensing pursuant to 10 CFR 30.20. Therefore, your second revised report should reference 10 CFR 32.26 in this sentence.
- In your revised report, you wrote, "The total activity of exempt Cs-137 sealed sources transferred under 10 CFR 32.20 in year 2014 was .002775MBq." Conditions 6.E, 7.E, 8.E, and 9.E of License No. 20-23465-02E concern the authorization of the distribution of products containing Cs-137 pursuant to 10 CFR 32.18 to persons exempt from licensing pursuant to 10 CFR 30.18. As such your second revised report should reference 10 CFR 32.18 in this sentence.

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 second 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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Materials Safety Licensing Branch
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US Nuclear Regulatory Commission
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Tel: +1 (301) 415-5608
Office: T-8i04

From: Reber, Eric
Sent: Wednesday, March 11, 2015 11:55 AM
To: 'George.Gleason@BrukerDetection.us'
Subject: Request for revision of exempt distribution report dated December 31, 2014

Dear Mr. Gleason,

I've reviewed your exempt distribution report dated December 31, 2014.

Please revise and resubmit your report to indicate which products were transferred under 10 CFR 32.18 and those products transferred under 10 CFR 32.26. Furthermore, the revised report must indicate that products transferred under 10 CFR 32.18 are transferred for use under 10 CFR 30.18 or equivalent regulations of an Agreement State. Also, the revised report must indicate that products transferred under 10 CFR 32.26 are transferred for use under 10 CFR 30.20 or equivalent regulations of an Agreement State. 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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