

**From:** Reber, Eric  
**To:** ["Brown, Martin"](#)  
**Subject:** Review 2014 Report of exempt distribution; Ushio America Inc. License No. 04-23968-01E  
**Date:** Tuesday, July 28, 2015 10:56:00 AM  
**Attachments:** [RIS 2014-10 Exempt Distribution.pdf](#)

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Dear Mr. Brown,

I apologize for the delay in reviewing the report dated January 16, 2015 that you provided to the NRC via email on April 22, 2015. Further review of our records did not indicate that the report was ever officially received by the NRC.

Your license 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 report that you provided is oriented more toward your inventory on hand and not toward distribution of products as required by the regulations. Please revise and resubmit your report paying particular attention to the following item:

10 CFR 32.16 (b)(2) requires that the report exempt distributions must include, for each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide. On a product model basis you provided the uCi/Lamp and the Quantity Shipped, so this information could be calculated. However, the requirement is to provide this information. In the revision to your report, please provide, for each radionuclide in each type of product and each model number the total quantity of the radionuclide that was distributed.

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

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

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**From:** Brown, Martin [mailto:mbrown@ushio.com]  
**Sent:** Wednesday, April 22, 2015 2:17 PM  
**To:** Reber, Eric  
**Subject:** RE: 2014 Report of exempt distribution

Was the person the report was sent to, correct? When Rick Munoz came out to inspect our facility earlier this years, we went through this same issue. We provided Mr. Munoz with the same information.

Martin Brown  
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**From:** Reber, Eric [mailto:Eric.Reber@nrc.gov]  
**Sent:** Wednesday, April 22, 2015 11:12 AM  
**To:** Brown, Martin  
**Subject:** 2014 Report of exempt distribution

Dear Mr. Brown,

I got your voicemail message. Please email me a copy of your report.

Thank you,  
Eric

Eric H. Reber  
General Engineer/Project Manager  
Materials Safety Licensing Branch  
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