



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

January 15, 2016

Perkin Elmer, Inc.  
ATTN: Mr. William R. Hoey  
549 Albany Street  
Boston, MA 02118

SUBJECT: SECOND REQUEST FOR ADDITIONAL INFORMATION REGARDING PERKIN  
ELMER INC. EXEMPT DISTRIBUTION LICENSE RENEWAL APPLICATION

Dear Mr. Hoey:

This letter refers to your letter dated December 4, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15343A508), which responded to our first request for additional information dated November 19, 2015 (ADAMS Accession No. ML15314A871). In reviewing your response, we have determined additional information is required to complete our review. In order to continue our review please address the issues listed below.

The intent of this request is to have an up-to-date document that provides all of the information required by the regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) 32.14, "Certain items containing byproduct material; requirements for license to apply or initially transfer," and described in the relevant guidance document NUREG-1556, Volume 8 titled, "Program-Specific Guidance about Exempt Distribution Licenses." It is acceptable to reuse previously submitted documents as long as they are provided as attachments to a new document describing your current program. The new document should provide the answers to each of the requested information listed below, either as a statement within the new document itself, or by referring to an attached, previously-submitted document.

1. In our first request for additional information dated November 19, 2015, we requested as required by 10 CFR 32.14(b)(2), details of construction and design of each product. In your letter dated December 4, 2015, you provided under Attachment 3, page 12, a blue print which is not legible. Please provide a clear and legible blue print. Also, under Attachment 3, page 14, you provided a diagram of the elevator assembly. Please show in the elevator assembly diagram the location of the Ba-133 source.
2. In our first request for additional information dated November 19, 2015, we requested as required by 10 CFR 32.14(b)(3), the method of containment or binding of the byproduct material in the products. In your letter dated December 4, 2015, you provided under attachment 3 a description of the construction of the product. After reviewing your response it is not clear how the byproduct material (sealed source) is contained or bound to the final product. Please provide a detailed description of the mounting and integrity of the sealed source in the product to demonstrate how the sealed source is protected from abuse or tampering.

W. Hoey

-2-

Any correspondence regarding your application should reference the control number specified below. Please submit the requested information within 30 days of the date of this letter. If we have not received complete information within 30 days of the date of this letter, we will consider your application as having been abandoned by you. This is without prejudice to the submission of a complete application.

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).

In accordance with 10 CFR 2.390, "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If you have any questions regarding the exempt distribution license, please contact me at (301) 415-6004 or by e-mail at [Hector.Rodriguez-Luccioni@nrc.gov](mailto:Hector.Rodriguez-Luccioni@nrc.gov).

Sincerely,

**/RA/**

Hector Rodriguez-Luccioni, Ph.D.  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 030-09023  
Mail Control No. 589267

W. Hoey

-2-

Any correspondence regarding your application should reference the control number specified below. Please submit the requested information within 30 days of the date of this letter. If we have not received complete information within 30 days of the date of this letter, we will consider your application as having been abandoned by you. This is without prejudice to the submission of a complete application.

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).

In accordance with 10 CFR 2.390, "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If you have any questions regarding the exempt distribution license, please contact me at (301) 415-6004 or by e-mail at [Hector.Rodriguez-Luccioni@nrc.gov](mailto:Hector.Rodriguez-Luccioni@nrc.gov).

Sincerely,

**/RA/**

Hector Rodriguez-Luccioni, Ph.D.  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 030-09023  
Mail Control No. 589267

**Certified Mail Tracking Number: 7015 1660 0001 1948 7840**

**ML15356A691**

<b>OFC</b>	MSTR/MSL	MSTR/MSL	MSTR/MSLB	MSTR/MSLB	MSTR/MSLB
<b>NAME</b>	HRodriguez-Luccioni	DMiller	RStruckmeyer	HGonzalez	HRodriguez-Luccioni
<b>DATE</b>	12/22/15	12/22/15	01/14/16	1/14/16	1/15/16

OFFICIAL RECORD COPY