

**From:** Reber, Eric  
**Sent:** Tuesday, February 02, 2016 6:11 PM  
**To:** 'bill.hoey@perkinelmer.com'  
**Subject:** Second Request for Revision to 2015 Report of Exempt Transfers; PerkinElmer; License No. 20-00320-14E

Dear Mr. Hoey,

I have now received your revised report dated January 25, 2016.

For transfers under 10 CFR 32.18, the issues raised in my January 26, 2016 email still need to be addressed.

Since you are now reporting transfers under 10 CFR 32.14, please keep in mind that the reporting requirements for such transfers differ significantly from those for transfers under 10 CFR 32.18. Please revise and resubmit your report to meet the reporting requirements for transfers under 10 CFR 32.14, which are found in 10 CFR 32.16:

*32.16 (a)(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 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.*

*(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.*

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

---

**From:** Reber, Eric

**Sent:** Tuesday, January 26, 2016 4:56 PM

**To:** 'bill.hoey@perkinelmer.com' <[bill.hoey@perkinelmer.com](mailto:bill.hoey@perkinelmer.com)>

**Subject:** Request for Revision to 2015 Report of Exempt Transfers; PerkinElmer; License No. 20-00320-14E

Dear Mr. Hoey,

I've reviewed your exempt transfers report dated January 15, 2016.

You have reported the form of radionuclides as "Liquid/Salt." Please revise and resubmit your report to indicate the quantity of radionuclides distributed according to the form distributed, i.e., you should report the the quantity of radionuclide distributed in a liquid form for each radionuclide and the quantity distributed as a solid form for each radionuclide. This request is based on the regulations in 10 CFR 32.20(c), which require you to report, for each radionuclide in each physical form, the total quantity of each radionuclide and the physical form, transferred under the specific license. 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