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**Cc:** [bill.roch@canberra.com](mailto:bill.roch@canberra.com)  
**Subject:** Request for Revision to 2015 Exempt Transfer Report; Canberra Industries, Inc.; License No. 06-15099-03E  
**Date:** Thursday, February 11, 2016 10:24:00 AM  
**Attachments:** [RIS 2014-10 Exempt Distribution.pdf](#)

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Dear M. Gelpke,

As I discussed with you over the phone, I've reviewed your 2015 exempt distribution report dated January 29, 2016, and additional information is needed to meet our reporting requirements.

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

For transfers pursuant to 10 CFR 32.18 for use under 10 CFR 30.18, please include the total quantity of the radionuclide for each radionuclide in each physical form as required by 10 CFR 32.20(c).

In addition to transfers under 10 CFR 32.18, your license also authorizes the distribution of exempt products pursuant to 10 CFR 32.14 and the reporting requirements for these products are significantly different than those distributed under 32.18. The reporting for transfers under 32.14 must be organized according products/devices/models numbers, which differs from the 32.18 reporting, which is organized by the physical form of the material. The record keeping and reporting requirements for transfers under 10 CFR 32.14 are located in 10 CFR 32.16. These reporting requirements are detailed and prescriptive and should be followed fastidiously. One requirement that is often overlooked is that you should indicate that your products that are distributed under 32.14 are for use under 10 CFR 30.15, giving the specific paragraph designation; in your case this will probably be 10 CFR 30.15(a)(9), which refers to ionizing radiation measuring instruments.

For your information, I have provided the reporting requirements for transfers under 10 CFR 32.14:

*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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