

From: Reber, Eric  
Sent: Friday, March 04, 2016 7:31 AM  
To: 'Jay Gupta'  
Subject: Request for Revision to 2015 Report of Exempt Transfers; Plus, LLC; License No. 06-35274-01E  
Attachments: RIS 2014-10 Exempt Distribution.pdf

Dear Mr. Gupta,

Thank you for sending me an electronic copy of your report and the information about the hard copy being sent via USPS. If you find out any further information concerning problems with the delivery of your report, please inform us.

Concerning the content of your report, you must revise your report so that it meets the reporting requirements for your license.

Specifically, please revise your report to indicate that the products are transferred for use under 10 CFR 30.15(a)(1). Also, you have indicated the amount of tritium in a single watch for each of the models that you distributed; however, you have not indicated the total amount of tritium that was transferred for each model number [i.e., for each watch model: (number of watches of a particular model) x (tritium/watch model)]. In the revision to your report, please include the total quantity of tritium distributed for each model number. 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

-----Original Message-----

From: Jay Gupta [mailto:jay@plusbrandsllc.com]  
Sent: Thursday, March 03, 2016 11:38 AM

To: Reber, Eric <Eric.Reber@nrc.gov>

Subject: [External\_Sender] Re: Request for 2015 Report of Exempt Transfers; Plus, LLC;  
License No. 06-35274-01E

Dear Mr Reber,

The report was duly submitted via USPS (tracking 9410811899223750375653) to the address you have outlined. Thank you for bringing it to our attention that you have not received it yet. We will open an investigation with USPS. Meanwhile, attached is an electronic copy of the report as you have requested.

Please let me know if there is any further information required.

Regards,

- Jay

(203) 524-6090

On Thu, Mar 3, 2016 at 10:08 AM, Reber, Eric <Eric.Reber@nrc.gov> wrote:

> Dear Mr. Gupta,

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> All holders of exempt distribution materials licenses are required to  
> submit annual reports of their distribution of exempt products by  
> January 31 of each year for the preceding year. From a review of our  
> records it appears that you have not submitted a report of the  
> distribution of exempt products under License No. 06-35274-01E for  
> 2015. If you have already submitted such a report or believe that you  
> are not required to submit such a report, please inform me. If you  
> have already submitted a report, please send me a copy of the report so that I can verify that  
it is in our system.

> Otherwise, you should submit your report without delay. Information  
> concerning the requirements for such reports is provided below.

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> 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 reporting requirements  
> are detailed and prescriptive and should be followed fastidiously.

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> 10 CFR 32.16 Certain items containing byproduct material: Records and  
> reports of transfer.

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> (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.

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- > (1) The report must clearly identify the specific licensee submitting the report and include the license number of the specific licensee.
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- > (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.
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- > (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:
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  - > (1) A description or identification of the type of each product and the model number(s), if applicable;
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  - > (2) For each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide; and
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  - > (3) The number of units of each type of product transferred during the reporting period by model number, if applicable.
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  - > (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.
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  - > (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.
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  - > (d) If no transfers of byproduct material have been made under § 32.14 during the reporting period, the report must so indicate.
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  - > (e) The licensee shall maintain the record of a transfer for one year after the transfer is included in a report to the Commission.

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> Further information about the requirements that apply to annual  
> reports of exempt distribution can be found in the attached Regulatory Issue Summary.

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> A hard copy of your revised report should be addressed and sent to:

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>  
> ATTN: Document Control Desk/Exempt Distribution  
>  
> Director, Office of Nuclear Material Safety and Safeguards  
>  
> U.S. Nuclear Regulatory Commission  
>  
> Washington, DC 20555-0001

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>  
> 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).

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> If you have any questions, please feel free to contact me.

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> Regards,

> Eric

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> Eric H. Reber

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> General Engineer/Project Manager

>  
> Materials Safety Licensing Branch

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> Division of Material Safety, State, Tribal, and Rulemaking Programs

> US Nuclear Regulatory Commission

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> Washington, DC 20555-0001

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> Tel: +1 (301) 415-5608

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> Office: T-8i04

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## REPORT OF TRANSFER DURING 2015

ATTN: Document Control Desk / Exempt Distribution

Date: 31st Jan 2016

Licensee: Plus LLC

License # 06-35274-01E

§ 30.15 Certain items containing byproduct material.

(a) Except for persons who apply byproduct material to, or persons who incorporate byproduct material into, the following products, or persons who initially transfer for sale or distribution the following products containing byproduct material, any person is exempt from the requirements for a license set forth in section 81 of the Act and from the regulations in parts 20 and 30 through 36 and 39 of this chapter to the extent that such person receives, possesses, uses, transfers, owns, or acquires the following products:

(1) Timepieces or hands or dials containing not more than the following specified quantities of byproduct material and not exceeding the following specified levels of radiation:

(i) 25 millicuries of tritium per timepiece

Product	Model	Tritium	Units
Watch	1920	20.2 mCi	9
Watch	1940	20.2 mCi	11
Watch	3000	21.91 mCi	19
Watch	3050	21.91 mCi	20
Watch	3080	21.91 mCi	8
Watch	4200	21.91 mCi	10
Watch	7050	21.91 mCi	2
Watch	8820	20.71 mCi	10