

**From:** [Reber, Eric](#)  
**To:** [Hikaru Okamura](#)  
**Subject:** Request for Revision to 2015 Report of Exempt Distribution; KRISS USA, Inc.; License No. 45-23855-01E  
**Date:** Friday, March 25, 2016 10:58:00 AM  
**Attachments:** [RIS 2014-10 Exempt Distribution.pdf](#)

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Dear Mr. Okamura,

I've reviewed your exempt distribution report dated March 24, 2015 for the 2015 reporting period. You must revise your report so that it meets the reporting requirements for your license.

In the revision of your report, please address the following issues:

- Include the statement: "The products were transferred for use under 10 CFR 30.19."
- Confirm whether the date of your report should be "March 24, 2015." Since the report was recently issued, it seems that the year should be "2016."
- Indicate the radionuclide that you distributed. This is probably H-3(tritium) because this is the only radionuclide authorized in your license.
- Include, for each type of product and each model number, the total quantity of the radionuclide distributed. This quantity can be calculated from the information you provided, but you are required to include this quantity.

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

We have recently been having difficulty receiving mail sent to our physical address. Therefore, you should also consider sending me a scanned copy of your revised report.

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:** Hikaru Okamura [mailto:h.okamura@kriss-usa.com]  
**Sent:** Thursday, March 24, 2016 1:37 PM  
**To:** Reber, Eric <Eric.Reber@nrc.gov>  
**Subject:** [External\_Sender] RE: Request for 2015 Report of Exempt Distribution; KRISS USA, Inc.; License No. 45-23855-01E

Dear Mr. Reber,  
We appreciate the notification you sent regarding the annual distribution. I mistakenly believed this report was submitted but couldn't find any records to support this oversight on my part. I have attached the letter in PDF format to this E-mail in addition to having one mailed out today to the address you specified. I've included this on my calendar to file this report on time for 2017. Thanks again!

Sincerely,

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**Hikaru Okamura** | *Compliance Manager*  
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**From:** Reber, Eric [mailto:Eric.Reber@nrc.gov]  
**Sent:** Wednesday, March 23, 2016 10:00 AM  
**To:** Hikaru Okamura <[h.okamura@kriss-usa.com](mailto:h.okamura@kriss-usa.com)>  
**Subject:** Request for 2015 Report of Exempt Distribution; KRISS USA, Inc.; License No. 45-23855-01E

Dear Mr. Okamura,

All holders of licenses authorizing the distribution of consumer products containing radioactive material to license-exempt persons are required to submit annual reports of their distribution of these 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. 45-23855-01E 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.

Your license authorizes the distribution of exempt products pursuant to 10 CFR 32.22. The record keeping and reporting requirements for such licenses are located in 10 CFR 32.25(c). The reporting requirements are detailed and prescriptive and should be followed fastidiously.

*32.25(c) [Licensees shall] Maintain records of all transfers 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 § 30.19 of this chapter or equivalent regulations of an Agreement State.*

*(3) The report must include the following information on products transferred to other persons for use under § 30.19 or equivalent regulations of an Agreement State:*

*(i) A description or identification of the type of each product and the model number(s);*

*(ii) For each radionuclide in each type of product and each model number, the total quantity of the radionuclide;*

*(iii) The number of units of each type of product transferred during the reporting period by model number.*

*(4)(i) 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.*

*(ii) Licensees who permanently discontinue activities authorized by the license issued under § 32.22 shall file a report for the current calendar year within 30 days after ceasing distribution.*

*(5) If no transfers of byproduct material have been made under § 32.22 during the reporting period, the report must so indicate.*

*(6) 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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If you have any questions, please feel free to contact me.

Regards,  
Eric

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