

From: Reber, Eric  
Sent: Monday, March 28, 2016 8:57 AM  
To: 'Eavenson, Dan'  
Subject: FW: Request for Revision to 2015 Report of Exempt Transfers; BRK Brands, Inc.; License No. 12-23809-01E  
Attachments: RIS 2014-10 Exempt Distribution.pdf

Dear Mr. Eavenson,

One other thing that should be revised is that the distribution of devices to Puerto Rico should be reported under your US sales and not international sales.

Thank you,  
Eric

From: Reber, Eric  
Sent: Monday, March 28, 2016 8:50 AM  
To: 'Eavenson, Dan' <DEavenson@firstalert.com>  
Subject: Request for Revision to 2015 Report of Exempt Transfers; BRK Brands, Inc.; License No. 12-23809-01E

Dear Mr. Eavenson,

I've reviewed your exempt distribution report dated March 22, 2016 for the 2015 reporting period. You must revise your report so that it meets the reporting requirements for your license.

Your report references regulatory requirements in 10 CFR 32.26 and 32.29. Please note that these requirements do not apply to your license. Your license authorizes the distribution of smoke detectors in accordance with 10 CFR 32.14. The corresponding recordkeeping and reporting requirements are provided in 10 CFR 32.16. Please revise your report to indicate the correct regulatory references. Also, include the following statement in your report: "The products were transferred for use under 10 CFR 30.15(a)(7) or equivalent regulations of an Agreement State." 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

From: Eavenson, Dan [mailto:DEavenson@firstalert.com]  
Sent: Thursday, March 24, 2016 10:56 AM  
To: Reber, Eric <Eric.Reber@nrc.gov>  
Subject: [External\_Sender] RE: Request for 2015 Report of Exempt Transfers; BRK Brands, Inc.; License No. 12-23809-01E

Mr. Reber,

I'm attaching electronic copies of the required documents. Physical and signed copies were put in certified mail yesterday. We apologize for the delay in getting these documents to you. Please let us know if any modification is needed.

Sincerely,

Daniel Eavenson | Compliance Engineer

3901 Liberty Street, Aurora, IL 60504  
Office: 630-499-3337  
Email: DEavenson@FirstAlert.com

Always Connected. Always Protected.

From: Reber, Eric [mailto:Eric.Reber@nrc.gov]  
Sent: Thursday, March 03, 2016 10:14 AM  
To: Eavenson, Dan <DEavenson@firstalert.com>  
Subject: Request for 2015 Report of Exempt Transfers; BRK Brands, Inc.; License No. 12-23809-01E

Dear Mr. Eavenson,

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. 12-23809-01E 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 32.14. 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.

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.

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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

From: Eavenson, Dan <DEavenson@firstalert.com>  
Sent: Thursday, March 24, 2016 10:56 AM  
To: Reber, Eric  
Subject: [External\_Sender] RE: Request for 2015 Report of Exempt Transfers; BRK Brands, Inc.; License No. 12-23809-01E  
Attachments: International Dist 2015.pdf; US Dist 2015.pdf

Mr. Reber,

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Sincerely,

Daniel Eavenson | Compliance Engineer

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Office: 630-499-3337  
Email: DEavenson@FirstAlert.com

Always Connected. Always Protected.

From: Reber, Eric [mailto:Eric.Reber@nrc.gov]  
Sent: Thursday, March 03, 2016 10:14 AM  
To: Eavenson, Dan <DEavenson@firstalert.com>  
Subject: Request for 2015 Report of Exempt Transfers; BRK Brands, Inc.; License No. 12-23809-01E

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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





3901 Liberty Street Road • Aurora, Illinois 60504-8122  
 Telephone: 630.851.7330 • Fax: 630.851.9254

Tuesday, March 22, 2016

*U.S. Nuclear Regulatory Commission  
 Attn: Deputy Director – NRC’s Office of International Programs  
 Washington, DC 20555-0001*

***Subject: Export shipments of Americium for calendar year 2015  
 Reference: 10 CFR 110.54(b)***

Attn: Deputy Director – NRC’s Office of International Programs

BRK Brands, Inc. is sending this letter to file an annual report of transfer as required by 10 CFR 110.54(b).

BRK Brands, Inc. distributes full-assembled ionization smoke alarms containing a maximum of 1 uCi of Americium 241 under NRC license 12-23809-01E. The end user would utilize these exempt devices as a residential smoke alarm.

The activity of each smoke alarm is 37 kBq ( $3.7 \times 10^{-8}$  TBq)  
 The amount of Americium 241 per smoke alarm is 0.0000002 grams.

In the table below you will find the quantity of assembled smoke alarms exported, approximate ship dates and recipient countries for calendar year 2015.

<b>Recipient Country</b>	<b>2015 Total Distribution</b>
Bayamon, Puerto Rico	4,968
Guaynabo, Puerto Rico	1,716
San Juan, Puerto Rico	480
Muniz Air National Guard Base, Puerto Rico	96
Abu Dhabi, United Arab Emirates	6,000
Pakistan	1,008
Kelowna, British Columbia, Canada	600
Safat, Kuwait	1,002
New Zealand	831
Colaba, Mumbai, India	510
Total	17,211

Sincerely,

Daniel Eavenson  
 Compliance Engineer  
 First Alert/BRK Brands, Inc.  
 630-499-3337





3901 Liberty Street Road • Aurora, Illinois 60504-8122  
 Telephone: 630.851.7330 • Fax: 630.851.9254

Tuesday, March 22, 2016

*Director of the Office of Federal and State Materials and  
 Environmental Management Programs  
 Document Control Desk/Exempt Distribution.  
 U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001*

***Subject: Reports of transfer, exempt material for 2014.***

***Reference: § 32.29 Conditions of licenses issued under § 32.26: Quality control, labeling, and reports of transfer.***

Attn: Document Control Desk/Exempt Distribution.

BRK Brands, Inc. is sending this letter to file an annual report of transfer as required by 10 CFR 32.29. 10 CFR 32.29 (c)(4)(i) requires this report to be filed every year no later than January 31<sup>st</sup>.

BRK Brands, Inc. distributes fully assembled ionization smoke alarms under NRC license number 12-23809-01E. The exempt products are transferred for use under equivalent regulations of an Agreement State.

The 2014 transfer counts for device model 1000J ionization chambers are shown below. Each ionization smoke alarm contains one 1000J ionization chambers per item 10 of our NRC license.

Ionization smoke alarms/1000J ion chamber units distributed in the US	10,684,257
Total quantity radionuclide AM-241 @ 1 uCi (37 kBq) maximum per alarm	10,684,257

Sincerely,

Daniel Eavenson  
 Compliance Engineer  
 First Alert/BRK Brands, Inc.  
 630-499-3337