



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 12, 2016

Triple, Inc. DBA Nixon
ATTN: Mike Ring
701 South Coast Highway
Encinitas, CA 92024

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING TRIPLE, INC.
AMENDMENT REQUEST TO EXEMPT DISTRIBUTION LICENSE AND
SEALED SOURCE AND DEVICE REGISTRATION CERTIFICATE

Dear Mr. Ring:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed amendment request dated February 18, 2016 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML16068A396), regarding Triple, Inc. exempt distribution license no. 04-35240- 01E and Sealed Source and Device registration certificate NR-1412-D-101-E. The staff has determined that additional information is needed. In order to continue with our review, please address the issues listed in the enclosure.

Any correspondence regarding your application should reference the control number specified below. Please submit the requested information within 30 days of the date of this letter. If we have not received complete information within 30 days of the date of this letter, we will consider your application as having been abandoned by you. This is without prejudice to the submission of a complete application.

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 Title 10 of the *Code of Federal Regulations* (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).

In accordance with 10 CFR 2.390 a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If you have any questions regarding the Sealed Source and Device Registration you can contact Tomas Herrera at (301) 415-7138 or via email at Tomas.Herrera@nrc.gov. For questions related to the exempt distribution license, please contact me at (301) 415-6004 or via email at Hector.Rodriguez-Luccioni@nrc.gov.

Sincerely,

/RA/

Hector Rodriguez-Luccioni, Ph.D.
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

Docket No. 030-38834
Mail Control No. 590346

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Docket No. 030-38834
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Certified Mail Tracking Number: 7015 0640 0003 2910 1221

ADAMS Accession #ML16098A139 (RAI) -

OFC	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB
NAME	Lisa Pope	Hector Rodriguez-Luccioni	Tomas Herrera	Maria Arribas-Colon
DATE	04/11/2016	04/11/2016	04/11/2016	04/12/2016
OFC	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB		
NAME	Hipolito Gonzalez	Hector Rodriguez-Luccioni		
DATE	04/12/2016	04/12/2016		

OFFICIAL RECORD COPY

Mike Ring
Triple, Inc. DBA Nixon
030-38834

A. REQUEST FOR ADDITIONAL INFORMATION REGARDING EXEMPT DISTRIBUTION LICENSE AND SEALED SOURCE AND DEVICE REGISTRAITON (SSD) CERTIFICATE

1. In your letter dated February 18, 2016, you stated that the new models, Sentry Chrono and 51-30 Chrono, are constructed of the same materials and the assembly process is the same as that of the Night Ranger T81. Besides the increase in the maximum activity for the new watch models, please describe the differences and similarities among all three models, preferably in a table format.

B. REQUEST FOR ADDITIONAL INFORMATION REGARDING EXEMPT DISTRIBUTION LICENSE

The following information is required by Title 10 of the *Code of Federal Regulations* (10 CFR) 32.22, "Self-Luminous Products containing Tritium, Krypton or Promethrium-147: Requirements for license to manufacture, process, produce, or initially transfer," and described in the relevant guidance document NUREG-1556 Volume 8 titled, "Program-Specific Guidance about Exempt Distribution Licenses."

1. In your letter you stated that each of the models (Sentry Chrono and 51-30 Chrono) will contain a nominal activity of 100 mCi of gaseous tritium in the form of sealed Gaseous Tritium Light Sources (GTLS). As required by 10 CFR 32.22(a)(2)(iv), please provide the solubility in water and body fluids of tritium gas.
2. As required by 10 CFR 32.22(a)(2)(viii), please provide the total quantity of byproduct material expected to be distributed in the product (including all models) annually.

C. REQUEST FOR ADDITIONAL INFORMATION REGARDING SEALED SOURCE AND DEVICE REGISTRATION CERTIFICATE

1. In your letter you provided drawings for the Sentry Chrono timepiece. The second drawing for the Sentry Chrono timepiece had dimensions that could not be read, specifically the dimension on the side view. Please resubmit a copy of the drawing, with readable dimensions. In addition, please ensure that all of the dimensions in the drawing include units of measure.

Enclosure