

**From:** [Reber, Eric](#)  
**To:** [Mackenzie, Barbara](#)  
**Cc:** [Cabrera, Ramon](#); [Sue Engelhardt](#)  
**Subject:** Request for Revision of 2015 Report of Exempt Distribution; Panasonic Corporation of North America; License No. 29-27907-01E  
**Date:** Thursday, June 16, 2016 5:02:00 PM  
**Attachments:** [RIS 2014-10 Exempt Distribution.pdf](#)

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Dear Ms. Mackenzie,

I've reviewed your exempt distribution report dated June 16, 2016 for the 2015 reporting period. You must revise your report so that it meets the reporting requirements for your license.

Please revise your report to include this or a similar sentence concerning the projector bulbs containing Kr-85: "The projector bulbs containing Kr-85 were transferred for use under 10 CFR 30.15(a)(8)(iv)."

(In future reports, if TLD readers containing C-14 are distributed under your license, your report of those transfers should include this or a similar sentence: "The TLD readers containing C-14 were transferred for use under 10 CFR 30.15(a)(9)." The regulation in 10 CFR 32.16(a)(2) requires that reports of exempt distribution include these or similar sentences.)

You have based your reporting on a range of radioactive material that could be contained in each product. The reporting requirements in 10 CFR 32.16 concern the *actual* quantities of radioactive material in products that were distributed rather than a range that *could* be distributed. In the revision of your report, please indicate the actual quantities of radioactive material that were distributed in your products. Also, you based your reporting for 10 CFR 32.16(b)(2) on the amount of a radionuclide in a single unit; you are required to report the total amount of radioactive material distributed according to model number. In the revision of your report, please report the total quantity of each radionuclide transferred according to the 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

We have been having difficulties receiving mail at our official address; therefore, I ask that you also send me a scanned copy of your report via email.

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:** Mackenzie, Barbara [mailto:barbara.mackenzie@us.panasonic.com]  
**Sent:** Thursday, June 16, 2016 3:52 PM  
**To:** Reber, Eric <Eric.Reber@nrc.gov>  
**Cc:** Cabrera, Ramon <ramon.cabrera@us.panasonic.com>; Sue Engelhardt <sue@radexperts.com>  
**Subject:** [External\_Sender] RE: RE: PANASONIC, REQUEST FOR 2015 DISTRIBUTION REPORT  
**Importance:** High

Dear Mr. Reber –

Attached is a PDF copy of our 2015 Distribution Report. In order to send the original to you via UPS please advise if the address below is correct. Our online UPS account does not recognize “Division of Material Safety, State, Tribal & Rulemaking Programs” :

US Nuclear Regulatory Commission  
Mr. Eric Reber, Project Manager  
Division of Material Safety  
Two White Flint North  
11545 Rockville Pike, MS: T-8E24  
ROCKVILLE MD 208522746  
Telephone: 301-415-5608

Please let us know if you require any further information and again, thank you for your patience.

Regards,  
*Barbara*

Barbara M. Mackenzie  
Panasonic Corp. of North America  
Product Safety & Compliance Division

Two Riverfront Plaza, 9<sup>th</sup> Floor  
Newark, NJ 07102  
O: 201-348-7761  
F: 201-348-7761

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**From:** Reber, Eric [<mailto:Eric.Reber@nrc.gov>]  
**Sent:** Thursday, June 16, 2016 9:57 AM  
**To:** Mackenzie, Barbara <[barbara.mackenzie@us.panasonic.com](mailto:barbara.mackenzie@us.panasonic.com)>  
**Cc:** Cabrera, Ramon <[ramon.cabrera@us.panasonic.com](mailto:ramon.cabrera@us.panasonic.com)>; Sue Engelhardt <[sue@radexperts.com](mailto:sue@radexperts.com)>  
**Subject:** RE: RE: PANASONIC, REQUEST FOR 2015 DISTRIBUTION REPORT

Hello Barbara,

When will you provide your 2015 exempt distribution report?

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  
Mail Stop: T-8E24

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**From:** Mackenzie, Barbara [<mailto:barbara.mackenzie@us.panasonic.com>]  
**Sent:** Monday, June 06, 2016 2:46 PM  
**To:** Reber, Eric <[Eric.Reber@nrc.gov](mailto:Eric.Reber@nrc.gov)>  
**Cc:** Cabrera, Ramon <[ramon.cabrera@us.panasonic.com](mailto:ramon.cabrera@us.panasonic.com)>; Sue Engelhardt <[sue@radexperts.com](mailto:sue@radexperts.com)>  
**Subject:** [External\_Sender] RE: PANASONIC, REQUEST FOR 2015 DISTRIBUTION REPORT

Dear Mr. Reber –

Yes, we understand we only need to submit a report regarding products distributed in the US.

Thank you -

*Barbara*

Barbara M. Mackenzie  
Panasonic Corp. of North America  
Product Safety & Compliance Division  
Two Riverfront Plaza, 9<sup>th</sup> Floor  
Newark, NJ 07102  
O: 201-348-7761

F: 201-348-7761

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**From:** Reber, Eric [<mailto:Eric.Reber@nrc.gov>]  
**Sent:** Monday, June 06, 2016 9:35 AM  
**To:** Mackenzie, Barbara <[barbara.mackenzie@us.panasonic.com](mailto:barbara.mackenzie@us.panasonic.com)>  
**Cc:** Cabrera, Ramon <[ramon.cabrera@us.panasonic.com](mailto:ramon.cabrera@us.panasonic.com)>; Sue Engelhardt <[sue@radexperts.com](mailto:sue@radexperts.com)>  
**Subject:** RE: PANASONIC, REQUEST FOR 2015 DISTRIBUTION REPORT

Dear Ms. Mackenzie,

Thank you for keeping me informed. I look forward to receiving your report. You mentioned your "inventory" in your email. Please keep in mind that the reporting requirements concern products that were distributed in the US and not those in your inventory.

If you have any specific questions, please let me know.

Kind 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  
Mail Stop: T-8E24

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**From:** Mackenzie, Barbara [<mailto:barbara.mackenzie@us.panasonic.com>]  
**Sent:** Thursday, June 02, 2016 4:52 PM  
**To:** Reber, Eric <[Eric.Reber@nrc.gov](mailto:Eric.Reber@nrc.gov)>  
**Cc:** Cabrera, Ramon <[ramon.cabrera@us.panasonic.com](mailto:ramon.cabrera@us.panasonic.com)>; Sue Engelhardt <[sue@radexperts.com](mailto:sue@radexperts.com)>  
**Subject:** [External\_Sender] PANASONIC, REQUEST FOR 2015 DISTRIBUTION REPORT  
**Importance:** High

Dear Mr. Reber –

Last week we received your letter dated 5/11/16 (attached) in which you advise we have not yet submitted our distribution transfer report for 2015. I apologize for this oversight and will gather the information and send to you within the next 2 weeks. As a matter of fact our radiation consultant, Ms. Susan Engelhardt, was on site with us last Thursday and I showed her your letter. She suggested I immediately send emails to both our manufacturer in Japan and our warehouse in Anaheim to confirm our inventory. These emails have already been sent and I am waiting for their

replies.

We take responsibility for our distribution license very seriously and appreciate your patience.  
Thank you Mr. Reber, I will send this report to you as soon as I confirm with Japan and Anaheim.

Sincerely,

*Barbara Mackenzie*

Barbara M. Mackenzie  
Panasonic Corp. of North America  
Product Safety & Compliance Division  
Two Riverfront Plaza, 9<sup>th</sup> Floor  
Newark, NJ 07102  
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