



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

March 20, 2017

Solis Tek Inc.  
ATTN: Simon Siu  
89 Leuning St., Unit D2  
South Hackensack, NJ 07606

SUBJECT: SOLIS TEK, INC., REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Siu:

This letter is in response to your application dated February 24, 2017, requesting an Exempt Distribution License.

We do not have sufficient information to complete the review of your application. In the enclosure to this letter you will find the list of the questions and items not addressed in your application. These questions are based on our understanding that your products consist of electron tubes, and that each tube does not contain more than 30 microcuries of krypton-85. If any of your products contain larger quantities of this, or contain other byproduct materials, we will ask additional questions.

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).

We will continue our review upon receipt of this information. If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information.

Any correspondence regarding your amendment application should reference Control Number 593175.

S. Siu

2

If you have any questions, please contact me at (301) 415-5477, or by e-mail at [Richard.Struckmeyer@nrc.gov](mailto:Richard.Struckmeyer@nrc.gov).

Sincerely,

**/RA/**

Richard K. Struckmeyer  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal,  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 030-39036

Enclosure:  
Request for Additional Information

S. Siu

3

SOLIS TEK, INC., REQUEST FOR ADDITIONAL INFORMATION

DATE: March 20, 2017

Certified Mailing No. 7015 3010 0000 7901 6208

**ML17068A350 (pkg.)**

**ML17079A302 (Letter)**

| OFC  | MSTR/MSLB           | MSTR/MSLB    | MSTR/MSLB                                 | MSTR/MSLB           |
|------|---------------------|--------------|---|---------------------|
| NAME | Richard Struckmeyer | Debra Miller | Tomas Herrera for<br>Hipólito J. González | Richard Struckmeyer |
| DATE | 03/20/2017          | 03/20/2017   | 03/20/2017                                | 03/20/2017          |

OFFICIAL RECORD COPY

**Solis Tek, Inc. Application dated February 24, 2017**  
**Request for Additional Information**

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the Solis Tek, Inc. application dated February 24, 2017, and determined that additional information is needed. In order to continue with our review, please address the issues listed below.

The information related to review of your exempt-distribution license application is required by Title 10 of *the Code of Federal Regulations*, Chapter 32 (10 CFR 32), Sections 32.14 and 32.15, and is described in the relevant guidance document NUREG-1556, Volume 8, titled "Program-Specific Guidance about Exempt Distribution Licenses." Please be advised that an application for an exempt distribution license should not contain information concerning the possession of radioactive material because that is covered in your separate possession license.

Please provide the information required by each of the following regulations.

1. 10 CFR 32.14(a) requires the applicant to satisfy the general requirements specified in Section 30.33 of 10 CFR. To do so, please provide a copy of your possession and use license from the State of New Jersey.
2. 10 CFR 32.14(b)(1) requires the applicant to submit the chemical and physical form and maximum quantity of byproduct material in each product.
3. 10 CFR 32.14(b)(2) requires the applicant to submit details of construction and design of each product.
4. 10 CFR 32.14(b)(3) requires the applicant to submit the method of containment or binding of the byproduct material in the product.
5. 10 CFR 32.14(b)(6) requires the applicant to submit the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. Note: 10 CFR 32.15(d)(1) requires labeling or marking of each unit and its container so that the manufacturer or initial transferor of the product and the byproduct material in the product can be identified.
6. 10 CFR 32.14(b)(7) requires the applicant to submit the radiation level and the method of measurement for products for which limits on levels of radiation are specified in Section 30.15 of this chapter. Section 30.15(a)(8) specifies a limit for electron tubes containing krypton-85.
7. 10 CFR 32.14(c) states that each product will contain no more than the quantity of byproduct material specified for that product in Section 30.15 of this chapter. The levels of radiation from each product containing byproduct material will not exceed the limits specified for that product in Section 30.15 of this chapter. Section 30.15(a)(8) specifies that the levels of radiation from each electron tube containing byproduct material do not exceed 1 millirad per hour at 1 centimeter from any surface when measured through 7 milligrams per square centimeter of absorber.

Enclosure

8. 10 CFR 32.14(d)(2)(viii) requires the applicant to provide information to show that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling.

The following paragraphs do not require specific responses; however, you should confirm that you understand the requirements contained in the cited regulations:

9. 10 CFR 32.15(b) states that no person licensed under Section 32.14 shall transfer to other persons for use under Section 30.15 of this chapter or equivalent regulations of an Agreement State:
  - (1) Any part or product tested and found defective under the criteria and procedures specified in the license issued under Section 32.14, unless the defective part or product has been repaired or reworked, retested, and found by an independent inspector to meet the applicable acceptance criteria; or
  - (2) Any part or product contained within any lot that has been sampled and rejected as a result of the procedures in paragraph (a)(2) of this section, unless:
    - (i) A procedure for defining sub-lot size, independence, and additional testing procedures is contained in the license issued under Section 32.14; and
    - (ii) Each individual sub-lot is sampled, tested, and accepted in accordance with the procedures specified in paragraphs (a)(2) and (b)(2)(i) of this section and any other criteria that may be required as a condition of the license issued under Section 32.14.
10. 10 CFR 32.16(a) requires each person licensed under Section 32.14 to maintain and report records of all transfers of byproduct material.