



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

July 3, 2017

Northpass, Ltd. DBA HIVIZ Shooting Systems
ATTN: Mr. Phillip Howe
Chief Executive Officer
620 S Adams St.
Laramie, WY 82070

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION, NORTHPASS, LTD. DBA HIVIZ SHOOTING SYSTEMS AMENDMENT REQUEST DATED DECEMBER 27, 2016

Dear Mr. Howe:

This letter is in response to your application dated April 24, 2017, requesting amendments to your Exempt Distribution License 49-35121-01E and Sealed Source and Device Registration Certificate NR-1382-D-101-E.

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.

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.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Any correspondence regarding your amendment application should reference Control Number 594696.

P. Howe

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If you have any questions, please contact Jocelyn Maciol at (301) 415-4666, or by e-mail at Jocelyn.Maciol@nrc.gov regarding the sealed source registration, and contact Richard Struckmeyer at (301) 415-5477, or by e-mail Richard.Struckmeyer@nrc.gov regarding the exempt distribution license.

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. 030-38863
License No. 49-35121-01E

Enclosure:
Request for Additional Information

REQUEST FOR ADDITIONAL INFORMATION, NORTHPASS, LTD. DBA HIVIZ SHOOTING SYSTEMS AMENDMENT REQUEST DATED DECEMBER 27, 2016

Date: July 3, 2017

ML17131A026 (pkg.)

ML17167A138 (Letter)

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|------|---------------------|----------------------|---------------------|----------------|
| OFC | NMSS/MSTR/MSLB | NMSS/MSTR/MSLB | NMSS/MSTR/MSLB | NMSS/MSTR/MSLB |
| NAME | Richard Struckmeyer | Debra Weaver | Jocelyn Maciol | Tomas Herrera |
| DATE | 06/26/2017 | 06/16/2017 | 06/27/2017 | 06/29/2017 |
| OFC | NMSS/MSTR/MSLB | NMSS/MSTR/MSLB | NMSS/MSTR/MSLB | |
| NAME | Maria Arribas-Colon | Hipólito J. González | Richard Struckmeyer | |
| DATE | 06/30/2017 | 06/30/2017 | 07/03/2017 | |

OFFICIAL RECORD COPY

Certified Mail: 7015-0640-0003-2910-2228

**North Pass, Ltd. DBA Hi-Viz Shooting Systems
Amendment Request dated April 24, 2017
Request for Additional Information**

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the North Pass, Ltd., DBA Hi-Viz Shooting Systems amendment request dated April 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 sealed source and service amendment application is required by Title 10 of the *Code of Federal Regulations* (10 CFR) 32.210 and is described in the relevant guidance document NUREG-1556, Volume 3, Revision 2, titled "Applications for Sealed Source and Device Evaluation and Registration."

The information related to review of your exempt distribution license amendment application is required by 10 CFR 32.22, 32.23, and 32.24, and is described in the relevant guidance document NUREG-1556, Volume 8, titled "Program-Specific Guidance about Exempt Distribution Licenses."

A. Information Required for Review of Sealed Source and Device Amendment Application

1. The amendment request stated that North Pass, Ltd., DBA Hi-Viz Shooting Systems (North Pass) is requesting to add five new models. However, the models listed in the amendment request showed five front and one rear, for a total of six models. The models listed in Attachment A and non-proprietary models in Attachment B did not mention N1V-F05. Please clarify if North Pass is seeking to register N1V-F05, and if it is, please include the dimensions and information provided in Attachment A, and a non-proprietary drawing in Attachment B.
2. Please provide the temperature and length of time used to cure the epoxy in the manufacturing of the gunsights.
3. Please provide the actions to be taken when product reaches end of its working life.

B. Information Required for Review of Exempt Distribution License Amendment Application

10 CFR 32.22(a)(2) requires the applicant to submit sufficient information relating to the design, manufacture, prototype testing, quality control procedures, labeling or marking, and conditions of handling, storage, use, and disposal of the self-luminous product to demonstrate that the product will meet the safety criteria set forth in § 32.23.

1. 10 CFR 32.22(a)(2)(iii) requires the applicant to submit the chemical and physical form of the byproduct material in the product and changes in chemical and physical form that may occur during the useful life of the product. Your application does not appear to provide this information. Please provide the chemical and physical form of the byproduct material in the product and changes in chemical and physical form that may occur during

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the useful life of the product, or state where this information is provided in your application.

2. 10 CFR 32.22(a)(2)(iv) requires the applicant to submit the solubility in water and body fluids of the forms of the byproduct material identified in paragraphs (a)(2) (iii) and (xii) of this section. Your application does not appear to provide this information. Please provide the solubility in water and body fluids of the byproduct material, or state where this information is provided in your application.
3. 10 CFR 32.22(a)(2)(vii) requires the applicant to submit information about the degree of access of human beings to the product during normal handling and use. Your application does not appear to provide this information. Please provide the degree of access of human beings to the product during normal handling and use, or state where this information is provided in your application.
4. 10 CFR 32.22(a)(2)(viii) requires the applicant to submit the total quantity of byproduct material expected to be distributed in the product annually. Your application does not appear to provide this information. Please provide total quantity of byproduct material expected to be distributed in the product annually, or state where this information is provided in your application.
5. 10 CFR 32.22(a)(2)(x) requires the applicant to submit the proposed method of labeling or marking each unit with identification of the manufacturer or initial transferor of the product and the byproduct material in the product. Please confirm that the labeling or marking of each unit does not differ from that described in your original application for a new license.