

Weaver, Deborah

From: Struckmeyer, Richard
Sent: Wednesday, August 22, 2018 2:49 PM
To: Hunt, Geoffrey L
Cc: Sepulveda, Lymari
Subject: RE: Control Number 609410 - Request for Additional Information Requested August 8th 2018
Attachments: Teledyne API RAI.pdf

Mr. Hunt,

Your email did not indicate whether you intended to send a report of exempt-product transfers to "Document Control Desk/Exempt Distribution" as required by 10 CFR 32.29.

To ensure that you have met this requirement, if you have not done so, please read and follow Section B of our Request for Additional Information (copy attached). You can send a copy to me as an email attachment in addition to the physical original to the Document Control Desk, but the regulations require that the physical original be sent to that address.

Regards,

Richard K. Struckmeyer
Materials Safety Licensing Branch
Division of Materials Safety, Security, State, and Tribal Programs
Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
301-415-5477

From: Hunt, Geoffrey L [mailto:Geoffrey.Hunt@Teledyne.com]
Sent: Wednesday, August 22, 2018 12:13 PM
To: Struckmeyer, Richard
Cc: Sepulveda, Lymari
Subject: [External_Sender] Control Number 609410 - Request for Additional Information Requested August 8th 2018

Attached please find the requested information on Teledyne API letterhead.

Regards,
Geoffrey Hunt
Radiation Safety Officer
Teledyne API



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

August 8, 2018

Mr. Geoffrey Hunt
Radiation Safety Officer
Teledyne API
9970 Carroll Canyon Drive
San Diego, CA 92131

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Hunt:

This letter refers to your application dated June 29, 2018, requesting termination of your U.S. Nuclear Regulatory Commission (NRC) Exempt Distribution License No. 04-23983-01E and inactivation of Sealed Source and Device Registration Certificate NR-1335-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. If you intend to submit the information to us via e-mail, it should be submitted in an official company letter as an attachment to an e-mail.

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 this renewal application should reference control number 609410.

G. Hunt

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If you have any questions, please contact Lymari Sepulveda at (301) 415-5619, or by e-mail at Lymari.Sepulveda@nrc.gov regarding the sealed source and device registration, and Richard Struckmeyer at (301) 415-5477, or by e-mail at Richard.Struckmeyer@nrc.gov regarding the exempt distribution license.

Sincerely,

/RA/

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

Docket No. 030-38294
License No. 04-23983-01E
SSDR NR-1335-D-101-E

Enclosure:
Request for Additional Information

G. Hunt

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TELEDYNE API, REQUEST FOR ADDITIONAL INFORMATION

Date: August 8, 2018

Certified Mail No. 7015 0640 0003 2910 1641

ML18204A005 (pkg.)

ML18218A105 (Letter)

OFC	MSST/MSLB	MSST/MSLB	MSST/MSLB	MSST/MSLB	MSST/MSLB
NAME	R. Struckmeyer	D. Weaver	L. Sepulveda	T. Herrera	R. Struckmeyer
DATE	08/7/2018	08/7/2018	08/7/2018	08/8/2018	08/8/2018

OFFICIAL RECORD COPY

Teledyne API, Certificate Inactivation and License Amendment Request
Dated June 29, 2018
Request for Additional Information

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the Teledyne API request dated June 29, 2018, 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 device inactivation request 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 32.29, 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 Inactivation Request

1. Please provide the total number of the products sold and the number of products still in use, if the exact number is not available an estimate should be provided.
2. Please indicate what services Teledyne will provide to its users.
3. Please confirm that no changes have been made to the product since its last amendment. If changes have been made, please provide the new information.

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

In accordance with the regulations in 10 CFR 32.29, "Conditions of licenses issued under § 32.26: Quality control, labeling, and reports of transfer," licensees who permanently discontinue activities authorized by the license issued under § 32.26 shall file a report for the current calendar year within 30 days after ceasing distribution. In order to continue our review please submit a report of transfer in conformance with the following subsections of 10 CFR 32.29:

(c) Maintain records of all transfers 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 § 30.20 of this chapter or equivalent regulations of an Agreement State.

Enclosure

(3) The report must include the following information on products transferred to other persons for use under § 30.20 or equivalent regulations of an Agreement State:

(i) A description or identification of the type of each product and the model number(s);

(ii) For each radionuclide in each type of product and each model number, the total quantity of the radionuclide;

(iii) The number of units of each type of product transferred during the reporting period by model number.

(4)(i) 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.

(ii) Licensees who permanently discontinue activities authorized by the license issued under § 32.26 shall file a report for the current calendar year within 30 days after ceasing distribution.

(5) If no transfers of byproduct material have been made under § 32.26 during the reporting period, the report must so indicate.

Your revised report should be addressed to:

ATTN: Document Control Desk/Exempt Distribution
Director, Office of Nuclear Material Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Because we occasionally have difficulties receiving mail at the NRC's official address, you may wish to send a scan of your revised report to me via e-mail.