FCML: JAJ (99709)

JAN 8 1980

Nite-Site, Inc. ATTN: Elliel F. Knutsen P.O. Box O Rosemount, MN 55068

Gentlemen:

This refers to your letter dated September 14, 1979, with which you submitted additional information in support of your application to amend License No. 22-13588-02G to permit general licensees to install gun sights. Your September letter was submitted in response to our letter dated July 27, 1979.

The information contained in your letter was not adequate for us to amend your license to authorize general licensees to install the gun sights. In addition to the information provided, we need a detailed safety analysis to demonstrate that no individual is likely to receive a dose in excess of 10 percent of the limits specified in the table in 20.101(a) of 10 CFR Part 20. Your analysis should include potential external doses and potential internal doses that may result from an accidental uptake of licensed material in an emergency situation. Your instructions to general licensees should be revised to include emergency instruction concerning what action they should take in cases of inadvertent release of the radioactive material. You should also revise your label to specifically state that the gun sights must be installed in accordance with your instruction.

In our July 27, 1979 letter, we asked how you would comply with Condition 3. of your license which requires a test for leakage and contamination immediately following installation of the gun sights. Your response was to request that we delete this requirement. We do not consider this an acceptably response. In order to ensure that the source integrity has been maintained during shipment and installation of the sight units, a leak test must be performed at the completion of the installation. Therefore, in order for us to approve your application, the Condition 3 requirement must be accomplished.

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Our review of your application will continue upon receipt of the above information. Please reply in duplicate and reference Control No. 99709. Sincerely, James A. Jones Material Licensing Branch Division of Fuel Cycle and Material Safety FCML FCML

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