



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

May 13, 2020

Mr. Brian Sayers  
Director Operations  
DHL Supply Chain (DSC)  
360 Westar Blvd  
Westerville, OH 43082-7627

SUBJECT: DHL SUPPLY CHAIN, EXTENSION FOR SUBMITTING ADDITIONAL  
INFORMATION REGARDING APPLICATION OF EXEMPT DISTRIBUTION  
LICENSE

Dear Mr. Sayers:

This letter refers to the email sent by Mr. Buddenbaum, on behalf of DHL Supply Chain (DSC), dated May 6, 2020, requesting an extension of the current new application review period for another 90 days. As stated in the email, the ongoing issues with the pandemic has hampered DSC's ability to resolve the remaining issues related the license application and request for additional information.

The U.S. Nuclear Regulatory Commission (NRC) staff reviewed the request and authorizes the 90-day extension for submitting additional information, listed below, required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 40.52, "Certain items containing source material; requirements for license to apply or initially transfer."

1. As stated in our previous letter, dated March 24, 2020, the regulatory requirement in 10 CFR Paragraph 40.13(c)(1)(iv) requires that each electric lamp does not contain more than 50 milligrams of thorium, neither the weight of the lamp, nor the percentage of thorium is applicable.

Your response stated that "For the majority of applicable lamp products, the total thorium content (electrodes and iodide coating in arc tubes) is less than 5 mg and the maximum total thorium content is less than 50 mg."

Please clarify that all your lamps containing less than 50 milligrams of thorium.

2. As required by the regulation, the initial distributor, or licensee, in this case, DHL Supply Chain, will be responsible for its distribution. Therefore, the identity of the licensee needs to be displayed on the label. Submit the proposed method of labeling or marking each unit, and/or its container with the identification of the initial transferor of the product. Additionally, the proposed method of labeling shall include all radioactive materials, i.e. Kr-85 and thorium, described in your application.

We will continue our review upon receipt of this information. If we do not receive a reply from you within 90 calendar days from the date of this letter, we will assume that you do not wish to pursue 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 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).

Sincerely,

Materials Safety and Tribal Liaison Branch  
Division of Material Safety, Security, State,  
and Tribal Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No. 030-39218  
Mail Control No. 618062

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DATED: May 13, 2020

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OFFICE	MSST/MSTR	MSST/MSTR	MSST/MSTR	MSST/MSTR
NAME	S Xu*	T Brockington*	D Alley*	S Xu*
DATE	05/11/2020	05/12/2020	05/ 13 /2020	05/ 13 /2020

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\*Concur by email