



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

April 13, 2020

Mr. Robin DeLaBarre
Office of Nuclear Energy, Safety
& Security, Room 3320 HST
Bureau of International Security
& Nonproliferation
U.S. Department of State
2201 C Street, NW
Washington, DC 20520


Dear Mr. DeLaBarre:

Enclosed is an application (XB1344), dated March 13, 2020, from Humboldt Scientific, Inc., received by the U.S. Nuclear Regulatory Commission, for the export of up to 30 density/moisture gauges to Iraq. While Humboldt could only identify four potential customers at this time, they are requesting authorization to sell up to 30 gauges in the Industrial regions of Iraq, consistent with previous Executive Branch guidance. Humboldt will provide the names and addresses of each additional gauge customer to the Executive Branch for vetting prior to their sale as discussed at the Subgroup on Nuclear Export Coordination meeting held on April 10, 2020. For clarity, each gauge contains 0.00037 TBq of cesium-137 and 0.00148 TBq of americium-241, which are Category 4 quantities.

Before acting on this request, we would appreciate your views, in accordance with Title 10 to the *Code of Federal Regulations* Part 110.41(a)(10), from the overall perspective of the Executive Branch, as to whether the requested export meets the applicable criteria in the Atomic Energy Act of 1954, as amended.

Sincerely,

4/13/2020

 Peter J. Habighorst

Peter J. Habighorst

Signed by: Peter J. Habighorst

Peter J. Habighorst, Chief
Export Controls and Nonproliferation Branch
Office of International Programs

Enclosure:
Export License Application

cc w/enclosure:

S. Oehlbert, DOE/NNSA
K. Strangis, DOE/NNSA
E. Sauls, DTRA

O. Toigo, DHS/CBP
S. Clagett, DOC
R. Bennett, DHS/CBP

J. Norles, DOE/NNSA
P. Dessaulles, DOE/NMMSS
E. Border, DOE/NNSA