



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

May 12, 2022

Mr. Charles Lanman
Radiation Safety Officer
TRUGLO, Inc.
525 International Parkway
Richardson, TX 75081

SUBJECT: TRUGLO, INCORPORATED REQUEST FOR ADDITIONAL INFORMATION
CONCERNING RENEWAL APPLICATION FOR AN EXEMPT DISTRIBUTION
LICENSE APPLICATION DATED JANUARY 19, 2022

Dear Mr. Lanman:

This letter refers to your application dated January 19, 2022, Agencywide Documents Access and Management System (ADAMS) accession number ML22028A226. In reviewing your application, we found that additional information is required to complete our review.

1. Please submit a copy of your current State of Texas license and/or a timely renewal letter.
2. The current license and sealed source and device registry (SSDR) include a distribution location at 5250 Frye Rd., Irving, Texas, 75061, however, your application does not include this location. Specifically, section 9 of your application, states, "*Only one facility exists for TRUGLO, Inc. at 525 International Pkwy, Richardson, TX, 75081*". Please confirm if the distribution location in Irving, Texas should remain on your license.
3. The current license includes sealed source model 400/1, however, your application requests to include model 400/2 and 400/3. These sources are not currently listed on your SSDR. Please confirm that you will continue to distribute model 400/1. Note: You may submit an amendment to your SSDR to add models.
4. The current SSDR includes sealed source model SRB Technologies, Model MH however, your application does not include this sealed source model. Please confirm if you will be distributing sealed source model SRB Technologies, Model MH.
5. Please update the application to include the most current SSDR dated August 18, 2021.
6. Please provide procedures for prototype testing and results of the product to demonstrate the effectiveness of the containment, shielding, and other safety features under both normal and severe conditions of handling, storage, use, and

disposal of the product.

7. Please provide the maximum external radiation levels at 5 and 25 centimeters from any external surface of the product, averaged over an area not to exceed 10 square centimeters, and the method of measurement.
8. Please describe the degree of access of human beings to the product during normal handling and use.
9. Please provide the total quantity of byproduct material expected to be distributed in the products annually.
10. Please submit the methods of labeling or marking the product and its point of sale packaging.
11. Provide an adequate dose assessment addressing all of the appropriate scenarios to demonstrate that the device meets the safety criteria in Section 32.23 of Title 10 of the *Code of Federal Regulations* (10 CFR), which references the table in 10 CFR 32.24.
12. Please update Page 4 of your Q&A procedures to replace the phone numbers for NRC contact with 1-800-368-5642 or 301-415-7000. The individuals listed no longer work for the NRC.

To continue review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below.

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 ADAMS. ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, you may contact me at (301) 415-3257, or by electronic mail at Michelle.Hammond@nrc.gov.

Sincerely,

Michelle M. Hammond, M.Sc.
Materials Safety and Tribal Liaison Branch
Division of Materials Safety, Security, State,
and Tribal Programs
Office of Nuclear Materials Safety
and Safeguards

License No. 42-23889-01E
Docket No. 030-36055
Mail Control No. 629918