



Materials Inspection Report

1. Licensee/Location Inspected:

Trijicon, Inc.
49385 Shafer Ave.
Wixom, MI 48393

2. NRC/Regional Office

Region III
U. S. Nuclear Regulatory Commission
2056 Westings Avenue, Suite 400
Naperville, IL 60563-2657

Report Number(s) 2024-001

3. Docket Number(s)

030-19451 and 030-20771

4. License Number(s)

21-19874-01 and 21-19874-02E

5. Date(s) of Inspection

11/21/2024 - 12/16/2024

LICENSEE:

The inspection was an examination of the activities conducted under your license as they relate to radiation safety and to compliance with the Nuclear Regulatory Commission (NRC) rules and regulations and the conditions of your license. The inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the inspector. The inspection findings are as follows:



1. Based on the inspection findings, no violations were identified.



2. Previous violation(s) closed.



3. During this inspection, certain of your activities, as described below and/or attached, were in violation of NRC requirements, and were assessed at Severity Level IV, in accordance with the NRC Enforcement Policy.

A. The violation(s), specifically described to you by the inspector as non-cited violations, are not being cited because they were self-identified, non-repetitive, corrective action was or is being taken, and the remaining criteria in the NRC Enforcement Policy were satisfied.

(Non-cited violation(s) was/were discussed involving the following requirement(s))

B. The following violation(s) is/are being cited in accordance with NRC Enforcement Policy. This form is a NOTICE OF VIOLATION, which may be subject to posting in accordance with 10 CFR 19.11.
(Violations and Corrective Actions)

Statement of Corrective Actions

I hereby state that, within 30 days, the actions described by me to the Inspector will be taken to correct the violations identified. This statement of corrective actions is made in accordance with the requirements of 10 CFR 2.201 (corrective steps already taken, corrective steps which will be taken, date when full compliance will be achieved). I understand that no further written response to NRC will be required, unless specifically requested.

TITLE	PRINTED NAME	SIGNATURE AND DATE
LICENSEE'S REPRESENTATIVE	N/A	
NRC INSPECTOR	Luis Nieves	LUIS NIEVES FOLCH Digitally signed by LUIS NIEVES FOLCH Date: 2025.01.08 16:52:12 -06'00'
BRANCH CHIEF	Rhex Edwards	 Digitally signed by RHEX EDWARDS Date: 2025.01.10 08:35:39 -06'00'



Materials Inspection Record

1. Licensee Name: Trijicon, Inc.		2. Docket Number(s): 030-19451 and 030-20771		3. License Number(s) 21-19874-01 and 21-19874-02E	
4. Report Number(s): 2024-001			5. Date(s) of Inspection: 11/21/2024 - 12/16/2024		
6. Inspector(s): L. Nieves & M. Casto		7. Program Code(s): 3214, 3620, 3254		8. Priority: 5	9. Inspection Guidance Used: IP 87125, 87128
10. Licensee Contact Name(s): Paul D. Koesler, P.E. - Director of Engineering		11. Licensee E-mail Address: pkoesler@trijicon.com		12. Licensee Telephone Number(s): 248-960-7700	
13. Inspection Type: <input checked="" type="checkbox"/> Routine <input type="checkbox"/> Announced <input type="checkbox"/> Non-Routine <input checked="" type="checkbox"/> Unannounced		14. Locations Inspected: <input type="checkbox"/> Hybrid <input checked="" type="checkbox"/> Main Office <input checked="" type="checkbox"/> Field Office <input type="checkbox"/> Temporary Job Site <input type="checkbox"/> Remote		15. Next Inspection Date (MM/DD/YYYY): 11/21/2029 <input checked="" type="checkbox"/> Normal <input type="checkbox"/> Extended <input type="checkbox"/> Reduced <input type="checkbox"/> No change	
16. Location(s) Inspected List: 49385 and 49397 Shafer Ave. Wixom, MI 48393					
17. Scope and Observations: <p>This was an inspection of Trijicon's possession and distribution licenses. Trijicon was a gun and bow sight manufacturing and distribution company authorized to poses luminous sealed sources of H-3. The licensee received H-3 lamps from the manufacturer and placed them inside Trijicon gun and bow sights. They distributed products domestically and internationally to members of the public, law enforcement agencies, and militaries.</p> <p>The inspectors toured the manufacturing floor including shipping and receiving, secure storage, inventory control areas, security guard room, and work stations. The inspectors interviewed a technician, line leads, managers, shipping and receiving staff, the security guard, and the inventory manager. Through interviews and observation of work activities, the licensee staff demonstrated knowledge of and adherence to NRC and licensee requirements and ALARA practices. Since the last inspection they did not distribute to any countries on the embargoed destinations list (10 CFR 110.28) and did not distribute material in excess of requirements to restricted destinations (10 CFR 110.29). The inspectors reviewed lamp break reports including one that required bio-assay per the licensee's procedure. The inspectors reviewed exposure and clean up procedures, wipe results, and dose calculations. There were no indications that exposures above the regulatory limits occurred. The inspectors reviewed audits, inventory, distribution reports, training, routine surveys, and device and package labeling.</p> <p>The inspectors reviewed details from NMED 210522 (EN 55624 12/10/2021). Scrap bags of H-3 that were disposed of appropriately by the licensee were stolen from the approved waste broker and found in a raid. The licensee was contacted by the authorities and given the material back to the licensee who dispose of it again utilizing a different waste broker. The material was stolen by an employee of the original waste broker. No issues were identified, NMED 210522 (CLOSED) and EN 55624 are now closed.</p> <p>No violations of NRC requirements were identified as a result of this inspection.</p>					

Materials Inspection Record (Continued)

Signature and Date - Branch Chief



Digitally signed by RHEX EDWARDS
Date: 2025.01.10 08:34:44 -06'00'

From: [Luis Nieves Folch](#)
To: [Paul Koesler](#)
Cc: [Mary Casto \(She/Her\)](#)
Subject: NRC 591 Trijicon Inspection Report
Date: Friday, January 10, 2025 8:46:00 AM
Attachments: NRC 591M Trijicon 2024 sign_RAE.pdf

Dear Paul

Attach is the clear 591 report for the inspection conducted on 11/21/2024. At this point there is no further actions on your part.

In accordance with Title 10 of the Code of Federal Regulations 2.390 of the NRC's "Rules of Practice," a copy of this message will be available electronically for public inspection in the NRC's Public Document Room or from the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC's website at <http://www.nrc.gov/reading-rm/adams.html>.

Please feel free to contact me if you have any questions regarding this correspondence.

Thank you,

Luis Nieves
Health Physicist
U.S. Nuclear Regulatory Commission
Division of Nuclear Materials Safety
Office: (630) 829-9571
Fax: (630) 515-1259