



CORPORATE OFFICE

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June 8, 2026

ATTN: Bryan Parker
Materials Licensing Branch
Division of Radiological Safety and Security
U.S. Nuclear Regulatory Commission, Region III
2056 Westings Ave., Suite 400
Naperville, IL 60563-2657
Bryan.Parker@nrc.gov


Subject: Additional Information for CN654801

Dear Bryan,

Thank you for your email correspondence dated June 5, 2026 noting outdated NUREG references in our renewal application dated December 19, 2025.

Please find attached an updated Form 313 Continuation Sheet that corrects these discrepancies. As the originally-submitted Form 313 itself and our facility map have not changed and do not require updates, I have elected to not re-send them with this communication. If you require them to be re-sent, please let me know.

Sincerely,


Paul D. Koesler
Director of Engineering
Trijicon, Inc.

Digitally signed by Paul D.
Koesler
Date: 2026.06.08 11:37:41
-04'00'

Enclosed:

1. Attachment 1: Form 313 Continuation Sheet 21-19874-01_updated_6-8-2026

Form 313 Continuation Sheet - Trijicon, Inc.
Renewal of Materials License No. 21-19874-01

ITEMS 5 THROUGH 11 PER NRC Form 313

Item 5. Radioactive Material

a. Element and Mass Number

- Hydrogen-3

b. Chemical and/or Physical Form

- Sealed sources. Manufactured by MB-Microtec A.G.; Model Numbers 400/1, 400/2, 400/3, 400/4, 400/5, 400/6, 400/7, 400/8, and 400/9. Manufactured by Smolsys USA, LLC; Model Numbers 500/1, 500/3, and 500/7.

c. Maximum amount which will be possessed at any one time

- No single source to exceed 5 curies, 30,000 curies total.

Item 6. Purposes for which licensed material will be used

- For possession incident to the manufacture and exempt distribution of gunsights and bow sights, and for research and development. Research and development activities include designing, developing, prototyping and testing potential new models of gunsights and bow sights. Sealed sources are not opened or modified as a part of Trijicon's R&D activities.

Item 7. Individual(s) responsible for radiation safety program and their training experience

- Stephen Bindon is the Radiation Safety Officer at Trijicon. As President/CEO of the company, he has the ultimate authority over all aspects of the company's operations, including radiation safety. Stephen has a BS degree in Chemical Engineering from the University of Michigan. He has also received instruction in radiation safety from Trijicon consultants. He has a background in physics including study of radioactive isotopes in the pursuit of his degree. He has prepared dose and other calculations for Trijicon's license applications to the NRC and he has functioned as the Radiation Safety Officer at Trijicon since 1986.

Item 8. Training for individuals working in or frequenting restricted areas

- All employees of Trijicon are familiar with the need for care in handling and storage of the nuclear materials which are the subject of this application. Only selected personnel use or frequent areas where material is used. These employees receive special instructions before they are allowed access to the materials. This training is in the form of a presentation which includes general information on radiation and radiation safety as well as internal material handling and safety procedures. The training is delivered by RSO-designated management employees who have experience with Trijicon's radiation safety program and is provided at least annually.

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Renewal of Materials License No. 21-19874-01

Item 9. Facilities and equipment

- Nuclear material inventory is stored in fire-rated safes. All assembly work using nuclear materials is completed in an area relating to the final assembled product. A facilities map showing tritium inventory storage and waste storage locations is attached to this renewal request ("Tritium inventory and disposal storage locations_2025-12-15.pdf").
The tritium inventory storage safes are located inside access-controlled areas within each building where tritium is utilized. The materials are used for assembly in areas proximate to the storage safe(s) in each building.
In buildings where production assembly with tritium occurs, there are also designated and access-controlled disposal storage areas, which are shown on the same facilities map. These areas contain Type A containers in which any broken or old / unused tritium sources are sequestered, along with any accident clean-up materials, prior to disposal as outlined in Item 11 "Waste Management", below.

Item 10. Radiation safety program

- 10.1. Trijicon has an ongoing Radiation Safety Program which explains the use of nuclear material to all new employees and reviews safety and handling procedures with all employees on a regular basis. All new employees are trained before they are able to handle nuclear material.
 - 10.1.1. A variety of state and federal government agencies have formulated regulations governing the use, storage, transportation and disposal of radioactive materials and sources. This Radiation Safety Program outlines the methods used by Trijicon to ensure compliance with the various regulations.
- 10.2. Statement of Philosophy and Responsibilities
 - 10.2.1. The philosophy of Trijicon, Inc. (Trijicon) is to comply with all state, federal and international rules that govern the handling of radioactive materials. It is also the philosophy of Trijicon to reduce exposures to employees and the general public to a level that is as low as is reasonably achievable (ALARA).
 - 10.2.2. The Radiation Safety Officer is responsible for planning, implementation and coordination of the radiation safety program. He/she establishes policies and responsibilities, and delegates specific duties and responsibilities to qualified personnel of various departments. The Radiation Safety Officer has full authority to stop any operation or action that he/she feels is unsafe or contrary to any regulation or requirement of Trijicon's NRC licenses.
- 10.3. Radiation Monitoring Instruments - Personnel Monitoring
 - 10.3.1. External radiation
 - 10.3.1.1. There is no external radiation hazard. The only isotope processed in the facility is Tritium gas contained in sealed sources. No external monitoring is needed.
 - 10.3.2. Internal exposure
 - 10.3.2.1. Internal exposure will be monitored by urinalysis for Tritium.
 - 10.3.2.2. Normal operations

Form 313 Continuation Sheet - Trijicon, Inc.
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10.3.2.2.1. All radioactive materials are contained in sealed sources. These sources are Tritium gas sealed in glass vials many of which are in turn sealed in metal tubes with sapphire windows. There is no release of Tritium during normal operations. There is no internal radiation hazard. Since all Tritium is handled in sealed sources, no urine analysis is required.

10.3.2.3. Accidental Release

10.3.2.3.1. Urinalysis will be performed within 24 hours of an accidental release involving more than 500 millicuries of Tritium.

10.4. Material Receipt and Accountability

10.4.1. We will comply with the NSTS reporting requirement, as described in 10 CFR 20.2207.

10.4.2. We will develop, implement, and maintain procedures for ensuring accountability of license materials at all times.

10.4.3. Enterprise Management System inventory audits will be conducted monthly to ensure license possession limits will not be exceeded.

10.4.4. Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources and devices received and possessed under the license.

10.4.5. Radioactive Material Ordering Procedure

10.4.5.1. Radioactive materials are ordered by Purchasing in response to a requisition issued by Production.

10.4.6. Radioactive Material Package Opening Procedures

10.4.6.1. All incoming packages containing radioactive materials are opened in the receiving area.

10.4.6.2. Incoming radioactive stock materials are checked for breakage. Any damaged or defective units are quarantined for disposal.

10.4.6.3. Contents of incoming packages are verified against the packing slip.

10.4.7. All incoming radioactive materials are transferred to the tritium storage safe and the change in inventory is recorded.

10.4.8. All transfers of radioactive materials from the storage safe to assembly workstations have to be cleared with the production manager or delegate after which the change in inventory is recorded.

10.5. Occupational Dose

10.5.1. We have done a prospective evaluation and determined that unmonitored individuals are not likely to receive, in one year, a radiation dose in excess of 10% of the allowable limits in 10 CFR Part 20.

10.5.2 We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502.

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10.6. Safe Use of Radionuclides

10.6.1. Procedures for safe use, security of materials, and emergencies will be developed and documented before receipt of licensed material. Operating and emergency procedures will be implemented and maintained.

10.6.2. Procedures will be revised only if (i) the changes are reviewed and approved by the licensee management and the RSO in writing; (ii) the licensee staff is provided training in the revised procedures prior to implementation; (iii) the changes are in compliance with NRC regulations and the license; and (iv) the changes do not degrade the effectiveness of the program.

10.6.3. All radioactive materials processed as a product will be

10.6.3.1. Processed in accordance with operation procedures;

10.6.3.2. Visually checked for illumination;

10.6.3.3. Quality control tested as required by purchase order or contract requirements;

10.6.3.4. Packed and shipped in compliance with proper DOT regulations; and

10.6.3.5. Proper inventory changes recorded.

10.6.4. General Manufacturing Safety Procedures

10.6.4.1. Eating, drinking and smoking are prohibited in areas where radioactive material is processed.

10.6.4.2 Hands should be frequently and thoroughly washed.

10.6.4.3. Bio-specimens for radiological assay will be furnished on request.

10.6.4.4. All personnel must adhere to Trijicon operational procedures, rules and regulations.

10.6.4.5. Personnel handling radioactive material must wear protective clothing as required by the operational procedures that apply to the work being performed.

10.6.5. Typical Assembly Procedure

10.6.5.1. Production materials

10.6.5.1.1. Gaseous Tritium light sources

10.6.5.1.2. Gun sight or archery sight components and materials

10.6.5.2. Production equipment

10.6.5.2.1. Disposable syringes

10.6.5.2.2. Tissues and swabs

10.6.5.2.3. Assembly tools as needed

10.6.5.3. Safety Equipment

10.6.5.3.1. Safety glasses or goggles, as required

10.6.5.3.2. Vinyl gloves

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Renewal of Materials License No. 21-19874-01

10.6.5.4. Operational procedure

10.6.5.4.1. Tube potting - only required on certain models

10.6.5.4.1.1. Dispense measured amount of potting compound.

10.6.5.4.1.2. Insert source.

10.6.5.4.1.3. Cure overnight at room temperature or as required.

10.6.5.4.2. Assembly of gun sights

10.6.5.4.2.1. Dispense measured amount of potting compound.

10.6.5.4.2.2. Insert source.

10.6.5.4.2.3. Wipe off excess potting compound.

10.6.5.4.2.4. Cure overnight at room temperature or as required.

10.6.6. Quality control

10.6.6.1. Perform specified dimensional and/or illumination checks.

10.6.6.2. Take finished products to packaging.

10.6.6.3. Package as required by customer.

10.6.6.4. Pack and ship in compliance with DOT regulations

10.7. Emergency Procedures

10.7.1. Trijicon has developed and maintains procedures for the safe use of radionuclides, as well as emergency procedures.

10.7.2. Reporting Incidents

10.7.2.1. In the event of any accidental spill, gas release, or contamination incident, the following must be instituted immediately.

10.7.2.1.1. Notify area supervisor and all other persons in the room. Leave the work area surrounding the accident for 15 minutes.

10.7.2.1.2. Notify the Radiation Safety Officer or designee with a description of the incident including: date, time, operator, operation being performed, source part number, and changes to prevent reoccurrences, if applicable.

10.7.2.1.3. Using rubber or latex gloves, place the unit in a sealed plastic bag and put in the quarantined Tritium area.

10.7.2.1.4. After contact with the unit, a person should wash their hands carefully with soap and water.

10.7.2.1.5. Upon returning to the work area, remove and replace paper on the workstation (if applicable) and clean the workstation with soap and water or appropriate surfactant solution.

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Renewal of Materials License No. 21-19874-01

10.7.3. Fire Protection Plan

10.7.3.1. Building Materials & Construction

10.7.3.1.1. The building materials used in construction of Trijicon's facilities are durable and fire resistant.

10.7.3.2. Fire Extinguishers

10.7.3.2.1. Fire extinguishers of various types and sizes, are located throughout each facility where flammable materials are used.

10.7.3.2.2. Location of fire extinguishers will be included in employee training.

10.7.3.3. Off-site Support

10.7.3.3.1. Local fire companies provide fire and emergency medical service.

10.7.3.4. Fires During Working Hours

10.7.3.4.1. In the event of fire

10.7.3.4.1.1 Notify all other persons in the room;

10.7.3.4.1.2 Notify the Vice President of Operations or other available management personnel.

10.7.3.4.1.3 The Vice President of Operations, or his designee, will announce to all employees, through the plant intercom system, a fire alert and/or evacuation if deemed necessary by the magnitude of fire, and call the local fire department.

10.7.3.4.1.4 The Radiation Safety Officer will oversee and recommend proper procedures for contamination control and personnel safety during and after fire fighting.

10.7.3.5. Fires During Non-Working Hours

10.7.3.5.1. Upon notification of the fire, the Radiation Safety Officer may assist the fire fighting units by recommending proper procedures for contamination control and personnel safety during and after fire fighting.

10.8. Surveys and Leak Tests

10.7.1 "We will survey our facility and maintain contamination levels in accordance with the survey frequencies and contamination levels published in Appendix M to NUREG-1556, Vol. 12, Rev. 1, "Consolidated Guidance about Material Licenses: Program-Specific Guidance about Possession Licenses for Manufacturing and Distribution."

10.8.2. Removable contamination

10.8.2.1. Frequency

10.8.2.1.1. Routine wipe samples of areas in which nuclear materials are stored or handled will be taken once a year.

10.7.2.1.2. Special wipe samples will be taken in the event of a source breakage greater than 500mCi.

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Renewal of Materials License No. 21-19874-01

10.8.2.2. Method

10.8.2.2.1. Wipe samples will be taken of an optimum surface area of 100 cm².

10.8.2.3. Analysis

10.7.2.3.1. Wipe samples will be sent to an outside analytical service for analysis. Trijicon will ensure outside analytical service complies to: "We will use instruments that meet the radiation monitoring instrument specifications published in Appendix H to NUREG-1556, Vol. 12, Rev.1 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution.' We reserve the right to upgrade our survey instruments as necessary."

10.8.3. Fixed contamination

10.7.3.1. Since the only isotopes handled are sealed sources, no surveys for fixed contamination are necessary.

10.8.4. Leak Testing

10.7.4.1. All sources are leak tested and certified by the manufacturers, MB Microtec A.G. or Smolsys USA, LLC. No in-house leak testing is required.

Item 11. Waste Management

- Nuclear waste is kept in sealed containers and is periodically disposed of via licensed waste-transfer brokers who transport the material to licensed waste facilities.
- We will use the model waste procedures published in Appendix P to NUREG-1556, Vol. 12, Rev.1 'Consolidated Guidance about Materials Licenses: Program-Specific Guidance About Possession Licenses for Manufacturing and Distribution.'

Martha Pavon

From: Paul Koesler <pkoesler@trijicon.com>
Sent: Monday, June 8, 2026 10:45 AM
To: Bryan Parker
Cc: Rod Delaca
Subject: [External_Sender] RE: RE: RE: Renewal Request for License No. 21-19874-01 / Control No. 654801
Attachments: Form 313 Continuation Sheet 21-19874-01_updated_6-8-2026_for_CN654801.pdf;
Cover Letter Materials License Renewal_updated_6-8-2026_for_CN654801.pdf

Bryan,

Per your request, please find attached a signed letter and an updated Form 313 continuation sheet for CN654801.

The Form 313 continuation sheet NUREG references have been corrected, and the content for item 10 has been largely re-ordered to match the checklist in Appendix B of NUREG-1556 Vol. 12 Rev. 1.

Please let me know if you require any other information or updates as part of your review.

Thank you.

Paul

Paul Koesler
Director of Engineering

Trijicon, Inc.

Tel: 248-960-7700 Ext.1186

Fax: 248-960-7725

49385 Shafer Avenue

Wixom, Michigan 48393 United States

pkoesler@trijicon.com | www.trijicon.com

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From: Bryan Parker <Bryan.Parker@nrc.gov>
Sent: Friday, June 5, 2026 3:46 PM
To: Paul Koesler <pkoesler@trijicon.com>
Subject: RE: RE: RE: Renewal Request for License No. 21-19874-01 / Control No. 654801

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Hey Paul,

In looking at the renewal application more in-depth, I will be needing some updated information. It appears that the current renewal is based on the previous version of NUREG-1556, Volume 12. Many of the references to various Appendices in your application no longer correspond to the Appendices in the new version (Revision 1). For example, Item 10.4.1.3 refers to Appendix K and Item 11 refers to Appendix S, and both of those have changed with the Revision 1 of Vol. 12.

Here is a link to the NUREG-1556 Series:

<https://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/index>

Please take a look at Rev 1 of Vol. 12. Appendix B of that Volume can be used as a checklist for many of the out-of-date items in your renewal application.

Also, you reference NUREG-1556, Volume 8, Appendix C in your application – in Items 10.4, 10.9 and 10.13. Please review those Items and see if the Vol 8, App C reference is appropriate. Volume 8 was also revised and can be reached thru the link above.

You may respond by email. Send me back your response with a **signed** PDF letter with any attachments (electronic signature is OK). Please mark it as “**Additional Information for CN654801**”.

Please let me know if you have any questions.

Thanks.

Bryan

Bryan A. Parker

Senior Health Physicist

USNRC Region III

bryan.parker@nrc.gov

678-828-7050

630-515-1078 (fax)



From: Paul Koesler <pkoesler@trijicon.com>

Sent: Thursday, June 4, 2026 10:28 AM

To: Bryan Parker <Bryan.Parker@nrc.gov>

Cc: Rod Delaca <rdelaca@trijicon.com>

Subject: [External_Sender] RE: RE: Renewal Request for License No. 21-19874-01 / Control No. 654801

Sounds good, Bryan.

Thank you for the update!

Paul

Paul Koesler

Director of Engineering

Trijicon, Inc.

Tel: 248-960-7700 Ext.1186

Fax: 248-960-7725

49385 Shafer Avenue

Wixom, Michigan 48393 United States

pkoesler@trijicon.com | www.trijicon.com

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From: Bryan Parker <Bryan.Parker@nrc.gov>

Sent: Thursday, June 4, 2026 10:26 AM

To: Paul Koesler <pkoesler@trijicon.com>

Cc: Rod Delaca <rdelaca@trijicon.com>

Subject: RE: RE: Renewal Request for License No. 21-19874-01 / Control No. 654801

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Hey Paul,

I have the application & it is literally next on my list. So I hopefully can get this done in the next couple of weeks. It looks fairly complete from a very cursory first glance, so as I get into the full review I will let you know asap if I need any additional information.

Please let me know if you have any questions.

Thanks.

Bryan

Bryan A. Parker

Senior Health Physicist

USNRC Region III

bryan.parker@nrc.gov

678-828-7050

630-515-1078 (fax)



From: Paul Koesler <pkoesler@trijicon.com>

Sent: Wednesday, June 3, 2026 9:57 AM

To: Tammy Tomczak <Tammy.Tomczak@nrc.gov>; Bryan Parker <Bryan.Parker@nrc.gov>

Cc: Rod Delaca <rdelaca@trijicon.com>

Subject: [External_Sender] RE: Renewal Request for License No. 21-19874-01 / Control No. 654801

Thank you, Tammy.

Bryan,

Please let me know if you need anything more from us on the renewal application.

Sincerely,

Paul

Paul Koesler
Director of Engineering

Trijicon, Inc.

Tel: 248-960-7700 Ext.1186

Fax: 248-960-7725

49385 Shafer Avenue

Wixom, Michigan 48393 United States

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From: Tammy Tomczak <Tammy.Tomczak@nrc.gov>

Sent: Wednesday, June 3, 2026 9:55 AM

To: Paul Koesler <pkoesler@trijicon.com>

Cc: Rod Delaca <rdelaca@trijicon.com>; Bryan Parker <Bryan.Parker@nrc.gov>

Subject: RE: Renewal Request for License No. 21-19874-01 / Control No. 654801

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Good morning, Paul,

Bryan Parker is the technical reviewer working on your renewal.

I have included Bryan on this email.

Thank you,
Tammy

From: Paul Koesler <pkoesler@trijicon.com>

Sent: Wednesday, June 3, 2026 8:49 AM

To: Tammy Tomczak <Tammy.Tomczak@nrc.gov>

Cc: Rod Delaca <rdelaca@trijicon.com>

Subject: [External_Sender] Renewal Request for License No. 21-19874-01 / Control No. 654801

Tammy,

Can you provide any updates on the status of Trijicon's renewal application for our materials license #21-19874-01 / Control No. 654801? We would be happy to provide any additional information you may require as part of the renewal process.

I only ask because we have fielded numerous questions in the last few weeks from our GTLS suppliers and license-holding customers regarding the status of our materials license. We have shared the Deemed Timely letter with those entities as evidence that we are still allowed to continue operations.

Thank you.

Paul

Paul Koesler
Director of Engineering

Trijicon, Inc.

Tel: 248-960-7700 Ext.1186

Fax: 248-960-7725

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Wixom, Michigan 48393 United States

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From: Tammy Tomczak <Tammy.Tomczak@nrc.gov>

Sent: Monday, December 29, 2025 11:46 AM

To: Paul Koesler <pkoesler@trijicon.com>

Subject: RE: RE: Acknowledgement - Renewal Request for License No. 21-19874-01

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You're welcome, Paul! Have a happy and safe New Year!!

From: Paul Koesler <pkoesler@trijicon.com>

Sent: Monday, December 29, 2025 10:43 AM

To: Tammy Tomczak <Tammy.Tomczak@nrc.gov>

Subject: [External_Sender] RE: Acknowledgement - Renewal Request for License No. 21-19874-01

Thank you, Tammy. That is all I need for now.

I'll be standing by if you require any additional information to process the renewal.

Paul

Paul Koesler
Director of Engineering

Trijicon, Inc.

Tel: 248-960-7700 Ext.1186

Fax: 248-960-7725

49385 Shafer Avenue

Wixom, Michigan 48393 United States

pkoesler@trijicon.com | www.trijicon.com

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From: Tammy Tomczak <Tammy.Tomczak@nrc.gov>

Sent: Monday, December 29, 2025 11:40 AM

To: Paul Koesler <pkoesler@trijicon.com>

Subject: Acknowledgement - Renewal Request for License No. 21-19874-01

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Good morning, Paul,

Please find attached your Deemed Timely Letter.

Please let me know if you have any questions or require any additional information.

Thank you,

Tammy Tomczak
Licensing Assistant
630-829-9564

Martha Pavon

From: Bryan Parker
Sent: Monday, June 8, 2026 1:39 PM
To: Martha Pavon
Cc: Sandy Pavon; Tammy Tomczak
Subject: Please add AI to ADAMS
Attachments: [External_Sender] RE: RE: RE: Renewal Request for License No. 21-19874-01 / Control No. 654801; 665 654801 Addl Info.pdf

Hey Martha,

Please add the attached Additional Information to ADAMS for CN654801 – Trijicon, Inc. A 665 is also attached.

Please let me know if you have any questions.

Thanks.

Bryan