

September 27, 2005

Ms. Dixie J. Wells-O'Dou  
Radiation Safety Officer  
Miniature Machine Corporation  
4430 Mitchell Street  
North Las Vegas, NV 89018

SUBJECT: SUMMARY OF PUBLIC MEETING WITH MINIATURE MACHINE  
CORPORATION, SEPTEMBER 14, 2005

Dear Ms. Well-O'Dou:

This letter summarizes the public meeting held at the U.S. Nuclear Regulatory Commission (NRC) Headquarters between the NRC and Miniature Machine Corporation (MMC). At the invitation of NRC staff a representative of MMC attended a meeting with NRC staff, on September 14, 2005, to discuss their Exempt Distribution License renewal application and a request to revise Sealed Source and Device Registration Certificate, No. NR-365-D-101-E, dated May 19, 2004.

NRC staff addressed areas where MMC would need to provide additional information before the MMC renewal request is finalized and the amendment request for the registration certificate is completed. The requirements that need to be addressed are:

- Designation of Sealed Source Models to be used in MMC products;
- Description of MMC products;
- Labeling of MMC products;
- An appropriate Quality Assurance Program;
- Prototype Testing;

The NRC staff outlined what type of information and level of detail the NRC would need from MMC when it responds to the NRC request for additional information.

The staff addressed key licensing and regulatory requirements, and clarified certain issues in the MMC application.

The MMC representative clarified what it meant by Original Equipment Manufacturer (OEM) and Custom Sights. The NRC staff was of the view that MMC was planning to insert tritium into sights that were permanently mounted or manufacture sights that were not the same as the series for which approval was requested in the MMC application. MMC clarified that it would only distribute removable sights. The OEM sights are sights manufactured by outside sources. MMC committed itself to establishing an acceptance criteria for the installation and distribution of tritium sights manufactured by others. NRC suggested that as a minimum, the acceptance criteria should verify that the dimensions, material, configuration of sources, and labeling match those of an approved MMC sight series.

When MMC refers to custom sights, it means that some type of gunsmith re-work is needed to attach the sight to the weapon; however, this re-work would not change the dimensions of the gun sight or affect the tritium sources. MMC clarified the difference between a gun sight and blade. A blade is similar to a regular gun sight except that a blade post is mounted perpendicular to the firearm.

The MMC application also included information regarding a knife with a tritium stud that they wish to distribute as an exempt product. MMC described to the NRC staff how the device would look like and confirmed that it would be distributed as a finished product. NRC staff explained to MMC that this request would have to be treated as a separate application. NRC staff stated that MMC would need to submit a complete application with sufficient information for the knives, so the staff may present this information to the Commission. The Commission will make a decision on whether this use of radioactive material is considered or is not considered frivolous according to the provisions of 10 CFR 32.22(b).

NRC understands that MMC's intention is to simplify its licensing documents for the manufacturing and distribution process. The participants agreed that the NRC will issue a request for additional information to the MMC. MMC also understands that the application must be a stand alone document and that all pertinent documents and information regarding their products must be included in the MMC response.

A copy of the meeting agenda is attached.

Sincerely,

**/RA/**

Timothy E. Harris, Section Chief  
Materials Safety Inspection Branch  
Division of Industrial and  
Medical Nuclear Safety  
Office of Nuclear Material Safety  
and Safeguards

Enclosure:  
September 14, 2005 Meeting Agenda

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Timothy E. Harris, Section Chief  
Materials Safety Inspection Branch  
Division of Industrial and  
Medical Nuclear Safety  
Office of Nuclear Material Safety  
and Safeguards

Enclosure:  
September 14, 2005 Meeting Agenda

Participants:

NRC Staff:

Tim Harris  
John Jankovich  
Ujagar Bhachu  
J. Bruce Carrico  
Tomas Herrera  
Jonathan Rivera  
Richard Struckmeyer

Miniature Machine Corporation:

Dixie Wells-O'Dou

Distribution: IMNS r/f JBCarrico  
ADAMS Accession No: ML052700408

OFFICE	MSIB	MSIB	MSIB	MSIB
NAME	THerrera	UBhachu	JJankovich	THarris
DATE	9/26/05	9/27/05	9/27/05	9/27/05

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**September 14, 2005**  
**Meeting Agenda**

- A. Introductions (9:00am to 9:15am)
- B. Meeting Purpose, Outcome, and Process (9:15am to 9:30am)
- C. MMC feedback from NRC letter dated July 29, 2005 (9:30am to 10:00am)
- D. MMC Application (10:00am to 10:30am)
  - 1. Thumbstud knife devices
  - 2. Original Equipment Gun Manufacture
  - 3. Custom Devices
- E. NRC presentation on information required for registration (10:30am to 11:30am) and licensing
  - 1. Sealed Source and Device
    - a. Discussion of missing and required information
    - b. Sample registration certificate
  - 2. Exempt Distribution License
    - a. Discussion of missing and required information
    - b. Sample license
- F. Lunch (11:30am to 1:00pm)
- G. Discussion (1:00pm to 2:30pm)
  - a. Presentations
  - b. Questions and Answers
- H. Closing (2:30pm to 3:00pm)
  - a. Next step

Enclosure