

**From:** [Johanning, Jeffrey R.](#)  
**To:** [Carrico, J Bruce](#)  
**Subject:** RE: License application - telephone conversation  
**Date:** Wednesday, February 06, 2013 3:35:48 PM

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Hello Bruce,

Thank you for taking the time to discuss my questions yesterday. At this time, I would like to withdraw the amendment request dated 12/19/12. I will be sending a new amendment request to add certain industrial devices under part 30.22/32.30 ASAP.

Jeff Johanning  
Sr. Health Physicist/RSO  
SAIC  
858-826-9725

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**From:** prvs=7238d70f1=JBruce.Carrico@nrc.gov [mailto:prvs=7238d70f1=JBruce.Carrico@nrc.gov] **On Behalf Of** Carrico, J Bruce  
**Sent:** Friday, January 18, 2013 10:48 AM  
**To:** Johanning, Jeffrey R.  
**Subject:** License application - telephone conversation

Mr. Johanning,

The link to the interim guidance on the rule change adding 30.22/32.30 for industrial devices is available at: <http://pbadupws.nrc.gov/docs/ML1121/ML112160118.html>. Note that the rule affected a number of changes but that the pertinent information for your interest is found on pp. 12-16.

As discussed yesterday, the device you described in your application can not approved as an ionizing radiation measuring instrument containing byproduct material for purposes of internal calibration or standardization under 30.15/32.14. Instead, we believe the device may qualify for distribution as a "certain industrial device" under 30.22/32.30. We agreed that the most appropriate path forward at this time would be for you to send an email withdrawing the amendment request and resubmit the request, along with an sealed source and device evaluation request, in accordance with the criteria in 10 CFR 32.30.

Bruce Carrico