



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

November 24, 2003

Mail Control No. 022313

Northrop Grumman Systems Corporation
Electronic Systems and Sensors Section
ATTN: Martin J. Muller, RSO
P. O. Box 1521 MS3T15
Baltimore, MD 21203

Subject: Request For Additional Information - Application For Exempt Distribution License

Dear Mr. Muller:

This refers to your application dated March 21, 2003, requesting renewal of your NRC exempt distribution license, and to our telephone conversation on November 18, 2003.

As noted in the aforementioned telephone conversation, we determined that most of the information required by 10 CFR 32.14 and 10 CFR 32.15 was not adequately referenced in the license conditions of your existing license (Amendment 11), nor was it supplied as part of your renewal application. As such, we do not have sufficient information to complete the review of your renewal application. In order to continue our review we ask that you provide the following additional information:

1. 10 CFR 32.14(b)(2) requires details of construction and design of each product. Please provide details of construction and design of each product.
2. 10 CFR 32.14(b)(3) requires that the method of containment or binding of the radioactive byproduct material in the product be described. Please provide the method of containment or binding of the radioactive byproduct material in the product.
3. 10 CFR 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. Please provide these procedures and describe the prototype testing performed on the product.
4. 10 CFR 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet.
5. 10 CFR 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor and the byproduct material in the product. Please describe the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor and the byproduct material in the product.

6. 10 CFR 32.14(d)(1) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe how the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling.
7. 10 CFR 32.15(a)(1) requires that each person licensed under §32.14 shall maintain quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product.
8. 10 CFR 32.15(a)(3) requires that each person licensed under §32.14 shall visually inspect each unit in inspection lots. Any unit that has an observable physical defect that could affect containment of the byproduct material shall be considered as a defective unit. Please describe how you shall visually inspect each unit in inspection lots for defects.
9. 10 CFR 32.15(c) requires that no person licensed under §32.14 shall transfer to other persons for use under §30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under §30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product.

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you and void the active control for your exempt distribution license renewal. This action would be without prejudice to the resubmission of another renewal application with the required information. Voiding active control of your renewal would require you to discontinue distribution of your exempt licensed products.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: rks@nrc.gov.

Sincerely,



Richard K. Struckmeyer, Health Physicist
Materials Safety and Inspection Branch
Division of Industrial and
Medical Nuclear Safety
Office of Nuclear Material Safety
and Safeguards

License No. 19-00428-11E
Docket No. 030-04528

6. 10 CFR 32.14(d)(1) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe how the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling.
7. 10 CFR 32.15(a)(1) requires that each person licensed under §32.14 shall maintain quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product.
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If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: rks@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Materials Safety and Inspection Branch
Division of Industrial and
Medical Nuclear Safety
Office of Nuclear Material Safety
and Safeguards

License No. 19-00428-11E
Docket No. 030-04528

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