



January 9, 2006

Materials Safety and Inspection Branch  
Div. of Industrial and Medical Nuclear Safety  
Office of Nuclear Material Safety and Safeguards  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555-0001

Attention Richard Struckmeyer

Subject: Clarification/ Amendment application for Exempt Distribution License No.  
04-23909- 01E (mail control number 022526)

SAIC would like to include the following modification/clarification to our license amendment request that you are currently reviewing. This clarification is relative to the distribution of exempt quantity check sources per 10CFR32.18 that are not installed in equipment, and are used to check and/or calibrate radiation detection equipment. These sources are normally distributed with certain pieces of equipment as noted in Item 6, of our license application dated October 20, 2003. However, there may be cases where such items would be distributed to support an already fielded piece of equipment, or replace a previously issued check source that was initially supplied with the equipment. Under these conditions the source may be distributed without a specific piece of equipment accompanying it.

Our current NRC license clearly allows distribution of these types of sources. However, since the initial application did not go into specific details on such areas as noted above and only discussed delivery of these sources with, but not installed in or attached to the equipment, SAIC wanted to ensure that the interpretation and license tie down were consistent with the distribution of check sources by themselves, separate from pieces of equipment.

If any additional modifications to the license are required to fully address that scope of use (such as reference to this memo), please amend the applicable sections with the existing amendment request for the AT820 system. If you have any further request or need further clarification, please feel free to contact me.

Thank you,

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