

April 15, 2015

Reactor Watch, LP  
ATTN: Jimmy Olmes, General Partner  
5312 Derry Ave.  
Suite B  
Augura Hills, CA 91301

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Olmes:

This letter refers to your application dated December 16, 2013, for a new U.S. Nuclear Regulatory Commission (NRC) Exempt Distribution Materials License. In reviewing your application, we find additional information is required to complete our review. In order to continue our review, please address the issues listed below. This information is required by 10 CFR 32.14, "Certain items containing byproduct material; requirements for license to apply or initially transfer," and described in the relevant guidance document NUREG-1556, Volume 8 entitled "Program-Specific Guidance about Exempt Distribution Licenses."

1. In item 6 of your application package, under "Purpose(s) for Which Licensed Material will be Used," you stated that Reactor Watch will not be manufacturing the sealed sources or the watches containing the sealed sources. Reactor Watch will be importing, possessing, storing, repairing, using and distributing the watches for initial sale. The watches and components will be manufactured by a company in accordance with the requirements in their NRC Exempt Distribution license (31-23712-01E) and Sealed Source and Device Registry (NY-127-S-101-S). Please clarify the address of mb-microtec where you will be receiving the watches.
2. In item 5 of your application package, under "Radioactive Material," you stated that the watches will be limited to 25 millicuries per watch, 5 millicuries per hand, and 15 millicuries per dial. Please provide details of construction and design of final product that support your statement as required by 10 CFR 32.14(b)(2).
3. As required by 10 CFR 32.14(b)(3), please provide the method of containment or binding of byproduct material in the final product.
4. As required by 10 CFR 32.14(b)(7), please provide the radiation level and the method of measurement.

Please note that exempt distribution licenses only authorize the product(s) to be distributed to persons exempt from licensing and do not authorize possession or use of radioactive material by the distributor. Persons who manufacture, process, produce or initially transfer for sale products containing byproduct material must meet the general requirements of 10 CFR 30.33 for possession and use of licensed material on Federal property, in an Agreement State, or in any State subject to the NRC jurisdiction. Therefore, applicants for exempt distribution licenses

may need to file a separate application for a specific license authorizing possession and use of byproduct material, incident to distribution. An exempt distribution license cannot be issued until the applicant obtains a possession and use license. The State of California (CA) has contacted us and informed us about your application for a possession and use license with the State of CA. We will notify the State of CA when we are about to issue the exempt distribution license.

Any correspondence regarding your application should reference the control number specified below. Please submit the requested information within 30 days of the date of this letter. If we have not received complete information within 30 days of the date of this letter, we will consider your application as having been abandoned by you. This is without prejudice to the submission of a complete application.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please contact me at (301) 415-6004 or electronic mail: [Hector.Rodriguez-Luccioni@nrc.gov](mailto:Hector.Rodriguez-Luccioni@nrc.gov).

Sincerely,

/RA/

Hector Rodriguez-Luccioni, Ph.D.  
Licensing Branch  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials  
and Environmental Management Programs

Docket No. 030-38703  
Mail Control No. 582782

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/RA/

Hector Rodriguez-Luccioni, Ph.D.  
Licensing Branch  
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DATE	4/ 8 /2014	4/ 8 /2014	4/ 15 /2014	4/ 15 /2014

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