

LUDLUM MEASUREMENTS, INC.

501 OAK STREET
P.O. BOX 810
SWEETWATER, TEXAS 79556
WEBSITE: www.ludlums.com



**DESIGNER AND
MANUFACTURER
OF**

*Scientific and Industrial
Instruments*

800-622-0828(US & CANADA)

325-235-4672(FAX)

325-235-5494

email: bhuckabee@ludlums.com

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04 June 2015

Mail Control No. 585914
License No. 42-21454-01E

Hector Rodriguez-Luccioni, Ph.D.
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal
And Rulemaking Programs
Office of Nuclear Material Safety
And Safeguards
United States Nuclear Regulatory Commission
Washington DC 20555-0001

Dear Dr. Rodriguez-Luccioni

This letter is in response to your letter dated 20 May 2015 which is the second request for additional information to renew Ludlum Measurements' Exempt Distribution License.

I would like to submit the following information;

In regards to item 1 of the above referenced letter from you, Ludlum Measurements has ceased to distribute radiation measuring instruments containing Americium-241, not to exceed 0.05 microcuries, for purposes of internal calibration or standardization. Please remove this authorization from our license.

In regards to item 2 of the above referenced letter from you, the byproduct material that we distribute in accordance with 10 CFR 32.18 is not contained in any food, beverage, cosmetic, drug, or other commodity designed for ingestion or inhalation by, or application to, a human being;

In regards to item 3 of the above referenced letter from you, the byproduct material that we distribute is in the form of processed chemical elements, compounds, or mixtures, tissue samples, bioassay samples, counting standards, plated or encapsulated sources, or similar substances, identified as radioactive and to be used for its radioactive properties, but is not incorporated into any manufactured or assembled commodity, product, or device intended for commercial distribution.

In reference to item 4 of the above referenced letter from you, Ludlum Measurements states that no more than 10 exempt quantities set forth in § 30.71, Schedule B of this chapter shall be sold or transferred in any single transaction. For purposes of this requirement, an individual exempt quantity may be composed of fractional parts of one or more of the exempt quantities in § 30.71, Schedule B of this chapter, provided that the sum of such fractions shall not exceed unity.

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In reference to item 5 of the above referenced letter from you, Ludlum Measurements states that each quantity of byproduct material set forth in § 30.71, Schedule B of this chapter shall be separately and individually packaged. No more than 10 such packaged exempt quantities shall be contained in any outer package for transfer to persons exempt pursuant to § 30.18 of this chapter. The outer package shall be such that the dose rate at the external surface of the package does not exceed 0.5 millirem per hour.

Ludlum Measurements response to item 6 of the above referenced letter from you is the exempt quantity byproduct material that we distribute are only purchased from NRC licensed manufacturer(s). The manufacturer's labels states, at the minimum, the isotope and quantity and the words Radioactive Material. In order to be approved to manufacture and distribute, then adherence to 10 CFR 32.19(c) is required. Pictures of labels are provided and labeled as *Attachment 1* and *Attachment 2*.

If any questions or issues arise, please contact me at 325.235.5494 x3417 or electronic mail:
bhuckabee@ludlums.com

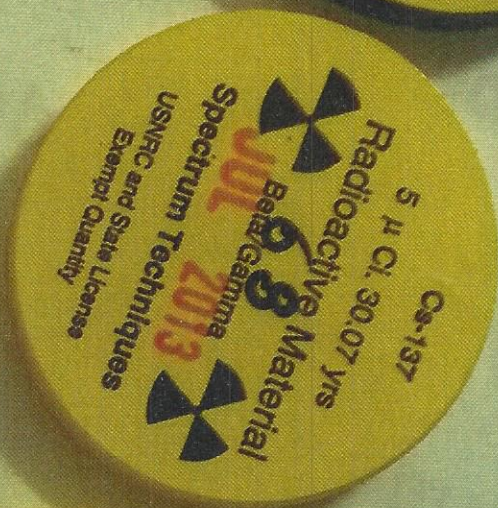
Regards,

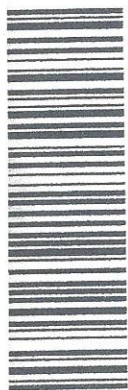
William Huckabee
Radiation Safety Officer

Attachment 1



Attachment 2





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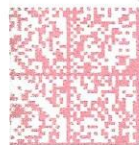
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Washington DC 20555-0001



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