



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

July 6, 2015

Walter Kidde Portable Equipment, Inc.  
ATTN: Patrick Keough, Manager  
Global Transportation and Logistics  
1016 Corporate Park Drive  
Mebane, NC 27302

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION

Dear Mr. Keough:

This refers to your letter and Application for Material License, NRC Form 313, dated June 17, 2015, (Agencywide Documents Access and Management System (ADAMS) No. ML15174A298) which requested amendment of U.S. Nuclear Regulatory Commission (NRC) Exempt-Distribution license number 32-23858-01E to authorize distribution of smoke detectors in accordance with 10 CFR 32.14 instead of 32.26, and to add certain models of smoke detectors.

The NRC revised its regulations in 2007 regarding distribution of smoke detectors. This regulatory change provides a new licensing approach for smoke detectors containing no more than 1 microcurie of americium-241 in the form of a foil. Smoke detectors which meet these criteria would no longer need to be licensed for distribution under 10 CFR 32.26, but instead could be authorized for distribution under 10 CFR 32.14. An important aspect of this change is that a sealed source and device (SSD) evaluation would not need to be conducted as part of the licensing process.

Your current license authorizes distribution of smoke detectors pursuant to 10 CFR 32.26 that appear to meet the requirements and be acceptable for distribution under 10 CFR 32.14. Because the products covered under your current license may be subject to regulatory requirements that would not be applicable under 10 CFR 32.14, or because your current license may subject you to commitments that would no longer be necessary, you must submit a complete up-to-date application addressing the applicable regulatory criteria specified in 10 CFR 32.14 and 10 CFR 32.15. It is acceptable to reuse previously submitted documents as long as they are provided as attachments to a new document describing your current program. The new document should provide the answers to each of the questions in the enclosure to this letter, either as a statement within the new document itself, or by referring to an attached, previously-submitted document. As previously mentioned, the SSD certificate associated with your device(s) would no longer be necessary. Therefore, you should also request that the certificate be inactivated with issuance of the amended license.

This change will affect your NRC fee obligations. Although we are requesting a complete, up-to-date application, because this license change is considered an amendment to your current license, it will not require a license application fee under Part 170. Your annual fee category

would change in accordance with 10 CFR 171.16. You would no longer be subject to the annual fee for a sealed source device registration certificate. Questions about fees should be directed to the Fees Help Desk at 301-415-5242 or by email at [SSD\\_ELicense.Resource@nrc.gov](mailto:SSD_ELicense.Resource@nrc.gov).

Your letter dated June 17, 2015, provided some of the information required by 10 CFR 32.14 and 10 CFR 32.15; however you did not provide sufficient information to complete the review of your application according to the conditions described above. In order to continue our review we ask that you provide the additional information in the enclosure to this letter. We will continue our review upon receipt of this information. 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. This action would be without prejudice to the resubmission of another application with the required information.

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>.

Any correspondence regarding this renewal application should reference control number 587165.

If you have any questions, please contact me at (301) 415-5477 or by electronic mail: [richard.struckmeyer@nrc.gov](mailto:richard.struckmeyer@nrc.gov). Questions regarding the sealed source and device registration should be directed to Tomas Herrera at (301) 415-7138 or by electronic mail: [Tomas.Herrera@nrc.gov](mailto:Tomas.Herrera@nrc.gov).

Sincerely,

**/RA/**

Richard K. Struckmeyer  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal,  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

Docket No.: 030-34526  
License No.: 32-23858-01E

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Division of Material Safety, State, Tribal,  
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Docket No.: 030-34526  
License No.: 32-23858-01E

DISTRIBUTION: MSTR r/f

ML15175A013 (pkg.)

ML15182A040 (RAI)

ML15182A056 (Enclosure)

**Certified Tracking Mail Number: 7014 0510 0000 4426 4721**

<b>OFC</b>	NMSS/MSTR/MSLB		NMSS/MSTR/MSLB		NMSS/MSTR/MSLB	
<b>NAME</b>	Richard Struckmeyer		Hipolito Gonzalez		Richard Struckmeyer	
<b>DATE</b>	07/01/2015		07/01/2015		07/01/2015	

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