



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

July 24, 2015

Cammenga and Associates, LLC
ATTN: Christopher Karchon
Director of Strategic Initiatives
2011 Bailey Street
Dearborn, MI 48124

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING CAMMENGA AND ASSOCIATES, LLC. AMENDMENT REQUEST TO EXEMPT DISTRIBUTION LICENSE AND SEALED SOURCE AND DEVICE REGISTRATION CERTIFICATE

Dear Mr. Karchon:

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the amendment request dated May 5, 2015, regarding Cammenga and Associates, LLC. exempt distribution license no. 21-26460-03E and Sealed Source and Device registration certificate NR-0210-D-102-E. The staff has determined that additional information is needed. In order to continue with our review, please address the issues listed in the enclosure.

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.

Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

In accordance with 10 CFR 2.390 a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If you have any questions regarding the Sealed Source and Device Registration you can contact Maria Arribas-Colon at (301) 415-6026 or by email at Maria.Arribas-Colon@nrc.gov. For questions related to the exempt distribution license, please contact me at (301) 415-6004 or email at Hector.Rodriguez-Luccioni@nrc.gov.

Sincerely,

/RA/

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

Docket No. 030-38679
Mail Control No. 586785

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Sincerely,

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Hector Rodriguez-Luccioni, Ph.D.
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal
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Office of Nuclear Material Safety
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Docket No. 030-38679
Mail Control No. 586785

ML15202A187 (RAI) - Certified Mail Tracking Number: 7014 0510 0000 4426 4493

OFC	NMSS/MSTR/MSLB*	NMSS/MSTR/MSLB*	NMSS/MSTR/MSLB*	NMSS/MSTR/MSLB*
NAME	Hector Rodriguez-Luccioni	Shirley Xu	Maria Arribas-Colon	Tomas Herrera
DATE	07/21/2015	07/21/2015	07/22/2015	07/23/2015
OFC	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB		
NAME	Hipolito Gonzalez	Hector Rodriguez-Luccioni		
DATE	07/23/2015	07/24/2015		

OFFICIAL RECORD COPY

Christopher Karchon
Cammenga and Associates, LLC
030-38679

A. REQUEST FOR ADDITIONAL INFORMATION REGARDING EXEMPT DISTRIBUTION LICENSE

This information is required by 10 CFR 32.22, "Self-luminous products containing tritium, krypton-85 or promethium-147: Requirements for license to manufacture, process, produce, or initially transfer."

1. Please provide the maximum external radiation levels at 5 and 25 centimeters from any external surface of the product, averaged over an area not to exceed 10 square centimeters, and the method of measurement.
2. Please provide the estimated external radiation doses and dose commitments relevant to the safety criteria in 10 CFR 32.23 and the basis for such estimates. You could also provide a justification of how the new material(s) used will not change the estimated external radiation doses and dose commitments calculated for the AF Series prototypes constructed with carbon steel.
3. Please provide a determination that the probabilities with respect to the doses referred to in 10 CFR 32.23(d) meet the criteria of that paragraph. You could also provide a justification of how the new material(s) used will not change the probabilities calculated for the AF Series prototypes constructed with carbon steel.

B. REQUEST FOR ADDITIONAL INFORMATION REGARDING SEALED SOURCE AND DEVICE REGISTRATION CERTIFICATE

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed the Cammenga and Associates, LLC amendment request dated May 5, 2015, and determined that additional information is needed. In order to continue with our review, please address the issues listed below. This information is required by 10 CFR 32.210 and described in the relevant guidance document NUREG-1556 Volume 3 titled "Applications for Sealed Source and Device Evaluation and Registration."

1. In your letter dated May 5, 2015, you stated in the materials of construction, you wish to remove the word "carbon" from carbon steel. Please provide the specific kind of steel(s) that will be used for the construction of the AF Series of gun sights. In your response, provide a justification of how this material(s) is equivalent to the material used in the AF Series prototypes (constructed of carbon steel). In your response, provide an analysis how the use of material may affect the product's design and integrity when subjected to conditions of normal use and likely accident conditions.
2. In your letter dated May 5, 2015, you stated that you wish to add the use of (1) titanium and (2) aluminum for the construction of the AF Series of gun sights. Please provide the specific kind of titanium and aluminum that will be used for the construction of the AF

Series of gun sights. In your response, provide a justification of how these materials are equivalent to the material used in the AF Series prototypes (constructed of carbon steel). In your response, provide an analysis how the use of this materials may affect the product's design and integrity when subjected to conditions of normal use and likely accident conditions.

3. In your letter dated May 5, 2015, you stated that you wish to add the use of "similar materials" for the construction of the AF Series of gun sights. Please provide a list of the "similar materials." In addition, provide a justification of how these materials are equivalent to the material used in the AF Series prototypes (constructed of carbon steel). In your response, provide an analysis how the use of this material may affect the product's design and integrity when subjected to conditions of normal use and likely accident conditions.
4. In the AF Series of gun sights the sealed source is inserted in an aluminum outer sleeve, which is then secured in the machined cavity of the "carbon steel" with silicone. Please discuss the corrosion compatibility between the materials used in the construction of the gun sights and the aluminum outer sleeve. Provide a discussion for each of the materials you wish to add.
5. In your letter dated May 5, 2015, you requested to change the range of the overall dimensions of the gun sights in the AF Series. Provide an analysis how the change in dimensions may affect the product's design and integrity when subjected to conditions of normal use and likely accident conditions.
6. In your letter dated May 5, 2015, you provided an updated version of the table for dimensions regions of the AF Series of gun sights. Please describe the components that will be affected by the new dimensions on the front and rear sights and whether they affect the part of the gun sights that contain the tritium sources. Please clarify whether the thickness of the material surrounding the tritium sources will change.
7. In your letter dated May 5, 2015, you requested to change the labeling from "engraved" to "engraved/etched, stamped, machined, molded, cast, or durable paint." Please provide specific details about each of the following labeling methods: (1) machined, (2) molded, and (3) cast.
8. In your letter dated May 5, 2015, you requested to change the labeling from "engraved" to "engraved/etched, stamped, machined, molded, cast, or durable paint." Please provide specific details about each of the following labeling methods: (1) stamped and (2) durable paint. In your response address the durability of these labeling methods. Please note that the labeling method used should be sufficiently durable to remain legible for the useful life of the product under normal conditions of use, to be acceptable.
9. In your letter dated May 5, 2015, you requested to add the option of using Cammenga's name/logo in addition to using Cammenga's exempt distribution license. Please provide specific details as well as a diagram or picture that includes "Cammenga's name" and the "Cammenga's logo" that will be used for labeling. For example if the word "Cammenga" will be used for distribution identification purposes, please state so. Please note, if a company logo will be used for identification of the distributor, the company logo must be trademarked and provide a copy of the trademarked logo.