



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

September 15, 2015

GMU Testing, Inc.  
ATTN: Dr. Horst Krupp  
Scientific Director  
1554 Creek Street  
San Marcos, CA 92069

**SUBJECT: GMU TESTING, INC., REQUEST FOR EXEMPT DISTRIBUTION ANNUAL  
TRANSFER REPORTS**

Dear Dr. Krupp:

After carefully reviewing our records, it appears that we do not have record of your exempt distribution transfer reports for the 2013 and 2014 reporting periods.

We note that in a letter dated August 4, 2014 (ML14212A686), the NRC requested your exempt distribution transfer reports for the reporting periods from 2009 through 2013. We also note that as a result of an NRC inspection conducted on May 7, 2014, you received a NOTICE OF VIOLATION (ML14160A876) because you had failed to file the required reports for 2010 through 2013. To date, we have received your reports for the reporting periods of 2009 through 2012 (ML14259A372 and ML14281A022).

As you are authorized, under 10 CFR 32.11, to transfer certain products containing byproduct material to individuals exempt from regulatory requirements, you must abide by the reporting requirements for your license, which are listed in 10 CFR 32.12. These requirements include the provision that you submit an annual report to the NRC detailing transfers taking place during the previous calendar year.

Pursuant to 10 CFR 32.12, you must include the following information in your annual transfer reports:

- identification of the licensee, including the license number of the licensee;
- indication that the products are transferred for use under 10 CFR 30.14 or equivalent regulations of an Agreement State;
- the type and quantity of each product or material into which byproduct material has been introduced during the reporting period;
- the name(s) and address(es) of the individual(s) who owned or possessed the product(s) or material(s), into which byproduct material has been introduced, at the time of introduction
- the type and quantity of radionuclide introduced into each product or material; and

- the initial concentration of the radionuclide(s) in the product(s) or material(s) at time of transfer of the byproduct material by the licensee.

These reports do not need to list each individual transfer (e.g. by date or recipient) or each individual unit transferred (e.g. by serial number), but must list the total number of units of each device type or model transferred for each reporting period. Also, if no transfers take place during a given reporting period, you are still required to submit a report stating so explicitly.

Pursuant to the regulations, your annual transfer reports must be submitted by January 31 each year, covering transfers that took place during the preceding calendar year. You should submit reports by mailing them to the following address:

ATTN: Document Control Desk/Exempt Distribution  
Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

or by some other means listed in 10 CFR 30.6(a).

Please submit copies of your reports for the 2013 and 2014 reporting periods within 30 calendar days of the date of this letter, so that we may incorporate them into our records.

Please be aware that upon your request, proprietary information submitted to the NRC may be withheld from public disclosure. To do this, you must follow the procedures in 10 CFR 2.390(b) including requesting withholding at the time the information is submitted and complying with the document marking and affidavit requirements set forth in 10 CFR 2.390(b)(1).

In accordance with 10 CFR 2.390, "Public inspections, exemptions, requests for withholding," a copy of this letter will be available electronically for public inspection in NRC's 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>.

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If you have any questions, or if your understanding differs from the above, please contact me at (301) 415-5608, or by electronic mail at [Eric.Reber@nrc.gov](mailto:Eric.Reber@nrc.gov).

Sincerely,

**/RA/**

Eric H. Reber  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal,  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

License No. 04-23964-01E  
Docket No. 030-37770

H. Krupp

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Sincerely,

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**DISTRIBUTION:**

MSTR r/f  
RIV/DNMS

**ML15258A009 – Certified Tracking Number: 7015 1520 0000 8172 2874**

**\*See previous concurrence**

OFC	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB
NAME	Eric Reber	Hipolito Gonzalez	Eric Reber
DATE	09/15/2015	09/15/2015	09/15/2015

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