

From: [Reber, Eric](#)
To: jeff.preston@flir.com
Subject: Request for Revision to 2015 Report of Exempt Transfers; FLIR Detection, Inc.; License No. 41-25639-01E
Date: Monday, March 14, 2016 5:27:00 PM
Attachments: [RIS 2014-10 Exempt Distribution.pdf](#)

Dear Mr. Preston,

I've reviewed your exempt distribution report dated January 26, 2016 for the 2015 reporting period. Some changes to your report are necessary so that it meets the reporting requirements for your license.

Your report is a bit of a jumble concerning regulatory references. Our regulations as they apply to your license and the way in which we wrote Condition 9 of your license is admittedly complicated. To start, I point out that your license authorizes main two things:

- Distribution under 10 CFR 32.14 of ionizing radiation measuring instruments containing Cs-137 for purposes of internal calibration or standardization for use under 10 CFR 30.15(a)(9).
- Distribution under 10 CFR 32.18 of licensed material as specified in 30.71, Schedule B, in the form of calibration sources for use under 10 CFR 30.18.

The two paragraphs of your report should be revised so that they reflect these two separate authorizations.

Specifically, in the first paragraph of your report, you should remove the reference to 32.14 and add this statement: "These products are transferred for use under 10 CFR 30.18 or equivalent regulations of an Agreement State."

In the second paragraph of your report, you should delete the words "Pursuant to sections 30.15 and 30.18, 10 CFR Part 30" and replace them with "Pursuant to 10 CFR 32.14" and add this sentence: "The products are transferred for use under 10 CFR 30.15(a)(9)." [I add that it does not appear from your license that you are authorized under 10 CFR 32.14 to distribute ionizing radiation measuring instruments containing manganese-54.]

Further information about the requirements that apply to annual reports of exempt distribution can be found in the attached Regulatory Issue Summary.

A hard copy of your revised report should be addressed and sent to:

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

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).

If you have any questions, please feel free to contact me.

Regards,
Eric

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