

From: [Reber, Eric](#)
To: [Langkan, Brian](#)
Subject: Request for Revision to 2015 Report of Exempt Transfers; Honeywell International, Inc.; License No. 12-15023-02E
Date: Friday, May 06, 2016 2:20:00 PM
Attachments: [RIS 2014-10 Exempt Distribution.pdf](#)

Dear Brian,

I've reviewed your exempt distribution report dated January 31, 2016, for the 2015 reporting period. You must revise your report so that it meets the reporting requirements for your license.

Please revise and resubmit your report to include this or a similar sentence: "The products were transferred for use under 10 CFR 30.15(a)(7)."

Also, as required by 10 CFR 32.16(b)(2), for each each model number, provide the total quantity of Am-241 that was distributed.

Please note that the reporting for your license must be made on a product model-specific basis; according, you are not required to report information on the customers that receive your products.

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

Recently, the NRC has been having difficulties receiving mail at its official address; therefore, I suggest that you send a scan of your revised report to me via email.

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

Eric H. Reber
General Engineer/Project Manager
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal, and Rulemaking Programs

US Nuclear Regulatory Commission
Washington, DC 20555-0001
Tel: +1 (301) 415-5608
Office: T-8i04

From: Langkan, Brian [mailto:Brian.Langkan@systemsensor.com]
Sent: Thursday, May 05, 2016 3:21 PM
To: Reber, Eric <Eric.Reber@nrc.gov>
Subject: [External_Sender] RE: URGENT ACTION NEEDED: Request for 2015 Report of Exempt Transfers; Honeywell International, Inc.; License No. 12-15023-02E

Eric,

My sincere apologies for the delay in responding. I know we had zero (0) exports last year, but have had problems locating my hard copies of the documents.

Please see attached for the distribution report. Our export report will indicate a total of ZERO exports, and I will send ASAP.

Again, apologies for the delay. We discontinued the production of these units in July of 2016, and the files have been placed into archives.

If you have any questions, please contact me at any time.

Sincerely,

Brian A. Langkan
Global Regulatory Compliance Leader

Honeywell | Security and Fire
Office: 630.762.5258
Mobile: 630.962.2069

From: Reber, Eric [mailto:Eric.Reber@nrc.gov]
Sent: Wednesday, May 04, 2016 10:40 AM
To: Langkan, Brian <Brian.Langkan@systemsensor.com>
Subject: URGENT ACTION NEEDED: Request for 2015 Report of Exempt Transfers; Honeywell International, Inc.; License No. 12-15023-02E

Brian,

We still don't have your report and we're considering enforcement action with regard to your case. Please send me a scan of your report for 2015 without delay.

Regards,

Eric

Eric H. Reber
General Engineer/Project Manager
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal, and Rulemaking Programs
US Nuclear Regulatory Commission
Washington, DC 20555-0001
Tel: +1 (301) 415-5608
Office: T-8i04
Mail Stop: T-8E24

From: Langkan, Brian [<mailto:Brian.Langkan@systemsensor.com>]
Sent: Thursday, March 03, 2016 11:26 AM
To: Reber, Eric <Eric.Reber@nrc.gov>
Subject: [External_Sender] RE: Request for 2015 Report of Exempt Transfers; Honeywell International, Inc.; License No. 12-15023-02E

Greetings Eric,

The reports were prepared and should have been sent to the NRC. I am working from home today, but back in the office tomorrow. While in the office tomorrow, I can get you a copy of the reports and send over to your attention. Please let me know if this is acceptable.

Thank you kindly

Brian A. Langkan
Global Regulatory Compliance Leader

Honeywell | Security and Fire
Office: 630.762.5258
Mobile: 630.962.2069

From: Reber, Eric [<mailto:Eric.Reber@nrc.gov>]
Sent: Thursday, March 03, 2016 9:59 AM
To: Langkan, Brian <Brian.Langkan@systemsensor.com>; JIM_STACH@SYSTEMSENSOR.COM
Subject: Request for 2015 Report of Exempt Transfers; Honeywell International, Inc.; License No. 12-15023-02E

Dear Mr. Langkan,

All holders of exempt distribution materials licenses are required to submit annual reports of their distribution of exempt products by January 31 of each year for the preceding year. From a review of our records it appears that you have not submitted a report of the distribution of exempt products under License No. 12-15023-02E for 2015. If you have already submitted such a report or believe

that you are not required to submit such a report, please inform me. If you have already submitted a report, please send me a copy of the report so that I can verify that it is in our system. Otherwise, you should submit your report without delay. Information concerning the requirements for such reports is provided below.

Your license authorizes the distribution of exempt products pursuant to 10 CFR 32.14. The record keeping and reporting requirements for such licenses are located in 10 CFR 32.16. The reporting requirements are detailed and prescriptive and should be followed fastidiously.

10 CFR 32.16 Certain items containing byproduct material: Records and reports of transfer.

(a) Each person licensed under § 32.14 shall maintain records of all transfers of byproduct material and file a report with the Director of the Office of Nuclear Material Safety and Safeguards by an appropriate method listed in § 30.6(a) of this chapter, including in the address: ATTN: Document Control Desk/Exempt Distribution.

(1) The report must clearly identify the specific licensee submitting the report and include the license number of the specific licensee.

(2) The report must indicate that the products are transferred for use under § 30.15 of this chapter, giving the specific paragraph designation, or equivalent regulations of an Agreement State.

(b) The report must include the following information on products transferred to other persons for use under § 30.15 or equivalent regulations of an Agreement State:

(1) A description or identification of the type of each product and the model number(s), if applicable;

(2) For each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide; and

(3) The number of units of each type of product transferred during the reporting period by model number, if applicable.

(c)(1) The licensee shall file the report, covering the preceding calendar year, on or before January 31 of each year. In its first report after December 17, 2007, the licensee shall separately include data for transfers in prior years not previously reported to the Commission.

(2) Licensees who permanently discontinue activities authorized by the license issued under § 32.14 shall file a report for the current calendar year within 30 days after ceasing distribution.

(d) If no transfers of byproduct material have been made under § 32.14 during the reporting period, the report must so indicate.

(e) The licensee shall maintain the record of a transfer for one year after the transfer is included in a report to the Commission.

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:

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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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

Regards,
Eric

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