



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

May 11, 2016

Mr. Alpesh Jiwani, President  
Prism USA Inc.  
22 West 48th Street, Suite 805  
New York, NY 10036

**SUBJECT: PRISM USA, INC., REQUEST FOR 2015 EXEMPT DISTRIBUTION ANNUAL  
TRANSFER REPORT**

Dear Mr. Jiwani:

After carefully reviewing our records, it appears that we do not have record of your exempt distribution transfer report for the 2015 reporting period.

We note that in a letter dated January 19, 2016 (ML16013A111), the NRC requested that you submit annual reports of exempt distribution as required by 10 CFR 32.12 as part of your license termination request. As requested, you did not provide this information within 30 calendar days of the date of this letter; therefore, your license termination request was voided (ML16069A078).

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). 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).

Your report for the 2015 reporting period appears to be past due; therefore, you should submit this report as soon as possible as we are considering enforcement action in your case.

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>.

A. Jiwani

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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. 31-35116-01E  
Docket No. 030-38697

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Sincerely,

**/RA/**

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**DISTRIBUTION:**

MSTR r/f  
RI/DNMS

**ADAMS Accession No: ML16132A479**

<b>OFC</b>	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB
<b>NAME</b>	Eric Reber	Hipolito Gonzalez	Eric Reber
<b>DATE</b>	05/11/2016	05/11/2016	05/11/2016

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