

Ramon P. Cabrera
Director, Product Safety and Compliance Division

June 16, 2016

Mr. 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

Subject: 2015 Exempt Distribution Report; Panasonic Corporation of North America;
License 29-27907-01E

Dear Mr. Reber,

Pursuant to 10 CFR 32.16, we are providing the below transfer report for 2015.

In calendar year 2015, Panasonic maintained its NRC E-Distribution License # 29-27907-01E, allowing it to distribute 1) projector bulbs that contain Krypton 85, and 2) Thermo Luminescent Dosimeter (TLD) readers containing Carbon 14. See attached copy of our E-Distribution License for your reference.

In accordance with 10 CFR 32.16, we are providing the attached E-Distribution Annual Transfer Report for the 2015 reporting period.

Should you have any questions or require further information, please do not hesitate to contact me. Thank you very much.

Sincerely,



Ramon P. Cabrera
Director, Product Safety & Regulatory Compliance
Corporate RSO

ANNUAL TRANSFER REPORT FOR 2015

(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.

Response: Panasonic Corporation of North America, E-Distribution License 29-27907-01E.

(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.

Response:

- 1) For the projector bulbs, the products were transferred to our California warehouse for which we maintain a Material License # 7721-30 issued by the California Dept. of Public Health, in Sacramento, CA. See attached copy of our Material License for your reference. The projector bulbs containing Kr-85 were transferred for use under 10 CFR 30.15(a)(8)(iv).
- 2) For the TLD readers, the products are transferred to our warehouse in Texas, for which we maintain a Radioactive Material License # L06729, issued by the Dept. of State Health Services in Texas. See attached copy of our Texas License for your reference.

(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;

Response: The projector bulbs contain Kr-85 within the bulb. The TLD readers contain C-14.

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

Response: The projector bulb contains Kr-85, maximum quantity of 27 nanocuries per bulb. The TLD reader contains C-14, maximum quantity of 100 microcuries per reader.

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

Response:

For the projector bulbs, we received and transferred the following amounts in 2015.

<u>Bulb Model No.</u>	<u>Quantity</u>	<u>Total Radioactive Amount</u>
ET-LAB2	46 pcs	1.242 microcuries
ET-LAB80	256 pcs	6.912 microcuries
ET-SLMP135	26 pcs	0.702 microcuries

For the TLD readers, there was no transfer of products, involving the below models.

<u>TLD Reader Model</u>	<u>Quantity</u>	<u>Total Radioactive Amount</u>
UD-716	0	0
UD-7900	0	0

U.S. NUCLEAR REGULATORY COMMISSION

Amendment No. 13

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		In accordance with letter dated December 15, 2015	
1. Panasonic Corporation of North America		3. License number 29-27907-01E is amended in its entirety to read as follows:	
2. Two Riverfront Plaza Newark, NJ 07102		4. Expiration date July 31, 2024	
		5. Docket No. 030-29563 Reference No.	
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license	
A. Krypton-85	A. Gas	A. Not applicable (See Condition 10)	
B. Carbon-14	B. Sealed Source	B. Not applicable (See Condition 10)	
9. Authorized use:			
A. In accordance with 10 CFR 32.14, "Certain items containing byproduct material; requirements for license to apply or initially transfer," the licensee is authorized to distribute electron tubes (lamps), and glow switches, containing not more than 30 microcuries of krypton-85, to persons exempt from the requirements for a license under 10 CFR 30.15(a)(8), or equivalent regulations of any Agreement State.			
B. In accordance with 10 CFR 32.14, "Certain items containing byproduct material; requirements for license to apply or initially transfer," the licensee is authorized to distribute Thermoluminescent Detector (TLD) readers, model numbers UD-716AGL and UD-7900M, containing carbon-14 scintillation sources for purposes of internal calibration or standardization, not greater than 100 microcuries per instrument, to persons exempt from the requirements for a license under 10 CFR 30.15(a)(9), or equivalent regulations of any Agreement State.			

CONDITIONS

10. This license does not authorize possession or use of licensed material.

11. The licensee is authorized to distribute only from facilities located at:

3454 East Miraloma Avenue, Anaheim, California
Sanyo Logistics Warehouse at 8400 Milliken Avenue, Suite 111, Rancho Cucamonga, California
Radiation Detection Company at 3527 Snead Drive, Georgetown, Texas

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**License Number
29-27907-01EDocket or Reference Number
030-29563


Amendment 13

12. The licensee shall submit periodic material transfer reports as specified in 10 CFR 32.16.
13. Except as specifically provided otherwise by this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Application dated July 26, 2013 (ML13214A173);
 - B. Letter dated July 11, 2014 (ML14197A203);
 - C. Letter dated August 12, 2015 (ML15237A275);
 - D. Letter dated November 2, 2015 (ML15310A466); and
 - E. Letter dated December 15, 2015 (ML15355A204).

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

Date February 4, 2016

By


Richard K. Struckmeyer
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal,
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards
Washington, DC 20555

RADIOACTIVE MATERIAL LICENSE

Pursuant to the California Code of Regulations, Division 1, Title 17, Chapter 5, Subchapter 4, Group 2, Licensing of Radioactive Material, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, use, possess, transfer, or dispose of radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations, and orders of the California Department of Public Health now or hereafter in effect and to any standard or specific condition specified in this license.

1. License:	Panasonic Corporation of North America	3. License Number:	7721-30	Amendment Number:	3
2. Address:	3454 East Miraloma Avenue Anaheim, CA 92806	4. Expiration Date:	July 7, 2018		(5)
Attention:	Elizabeth Galloway Radiation Safety Officer	5. Inspection Agency:	Radiologic Health Branch South		

License Number 7721-30 is hereby amended as follows:

6. Nuclide	7. Form	8. Possession Limit
A. Krypton-85	A. Gas	A. 1.0 kilobecquerels (27 nanocuries) per device. Total not to exceed 10.0 megabecquerels (270 microcuries).
B. Krypton-85	B. Gas	B. 185 becquerels (5 nanocuries) per device. Total not to exceed 1.85 megabecquerels (50 microcuries).

9. Authorized Use

- A. To be used as glow starters for light bulbs for possession and storage prior to distribution.
- B. To be used as glow starters for projector bulbs for possession and storage prior to distribution.

LICENSE CONDITIONS

- 10. Radioactive material shall be stored only at the following location:
 - (a) 3454 East Miraloma Avenue, Anaheim, CA
- 11. This license is subject to an annual fee for sources of radioactive material authorized to be possessed at any one time as specified in Items 6, 7, 8 and 9 of this license. The annual fee for this license is required by and computed in accordance with Title 17, California Code of Regulations, Sections 30230-30232 and is also subject to an annual cost-of-living adjustment pursuant to Section 100425 of the California Health and Safety Code.
- 12. Radioactive material shall be used by, or under the supervision of, the following individuals:
 - (a) Elizabeth Galloway
 - (b) Alex Plewnarz
- 13. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 7, 8 and 9 of this license in accordance with the statements, representations, and procedures contained in the documents listed below. The Department's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
 - (a) The application dated May 22, 2008 and its update of July 8, 2008 both signed by Ramon Cabrera, Director of Product Safety, with attachments thereto.
 - (b) The letter dated August 31, 2009, signed by Ramon Cabrera, Product Safety Manager, regarding the addition of a new storage location.

RADIOACTIVE MATERIAL LICENSE

License Number: 7721-30Amendment Number: 3

- (c) The letter dated March 21, 2011, signed by Ramon Cabrera, Director of Product Safety and Compliance, letter dated May 17, 2011, signed by Sue Engelhardt, Consultant, and letter with attachment dated June 10, 2011, signed by Barbara Mackenzie, Product Compliance Administrator, regarding the addition and deletion of a storage location.
- (d) The letter dated December 7, 2015, the letter with attachments dated January 25, 2016, and the Delegation of Authority, dated January 29, 2016, all signed by Ramon P. Cabrera, Product Safety Director, regarding changes in personnel, updated emergency contact list, and the release of 8400 Milliken Avenue, Suite 111, Rancho Cucamonga for unrestricted use.
14. (a) The Radiation Safety Officer in this program shall be **Elizabeth Galloway**.
(b) The Alternate Radiation Safety Officer in this program shall be **Alex Plewnarz**.
15. This license does not authorize distribution of radioactive material pursuant to Title 17, California Code of Regulations, Sections 30180 and 30192 through 30192.6 or equivalent provisions of the U.S. Nuclear Regulatory Commission or Agreement States.
16. At least 30 days prior to vacating any address of use listed in Condition 10 of this license, the licensee shall provide written notification thereof to the California Department of Public Health, in accordance with Title 17, California Code of Regulations, Section 30256 (b).
17. A copy of this license and all records and documents pertaining to this license shall be maintained available for inspection at 3454 East Miraloma Avenue, Anaheim, CA.
18. The licensee will provide the Low Level Radioactive Waste (LLRW) reports specified in the California Health and Safety Code section 115000.1(h) to the California Department of Public Health (CDPH) on an annual basis for both shipped and stored LLRW. Alternatively, LLRW shipment information may be provided on a per shipment basis. LLRW shipment information and annual reports shall be mailed to:

Attn: LLRW Tracking Program
California Department of Public Health
Radiologic Health Branch, MS 7610
P.O. Box 997414
Sacramento, CA 95899-7414

Issued for the California Department of Public HealthDate: February 10, 2016By: 

Ronald Rogus
Senior Health Physicist
Radiologic Health Branch, MS 7610
P.O. Box 997414
Sacramento, CA 95899-7414



Department of State Health Services

RADIOACTIVE MATERIAL LICENSE

Pursuant to the Texas Radiation Control Act and Texas Department of State Health Services (Agency) regulations on radiation, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess and transfer radioactive material listed below; and to use such radioactive material for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations and orders of the Agency now or hereafter in effect and to any conditions specified below.

LICENSEE

1. Name **PANASONIC CORPORATON
OF NORTH AMERICA
C/O RADIATION DETECTION COMPANY
ATTN RON SMITH**

2. Address **PO BOX 9000
GEORGETOWN TX 78627**

This license is issued in response to an application

Dated: **May 19, 2015**

Signed by: **Ramon P. Cabrera, Director**

3. License Number

L06729

Amendment Number

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PREVIOUS AMENDMENTS ARE VOID

4. Expiration Date

July 31, 2025

RADIOACTIVE MATERIAL AUTHORIZED

5. Radioisotope	6. Form of Material	7. Maximum Activity	8. Authorized Use
A. C-14	A. BaCO ₃ Silicone Resin Source (Panasonic Model 716AU14)	A. 15 sources not to exceed 100 microcuries each Total: 1.5 millicuries	A. Possession only of Panasonic Model UD-716 AGL TLD Reader pursuant to U.S.NRC Exempt Distribution License No. 29-27907-01E.
B. C-14	B. BaCO ₃ Silicone Resin Source (Panasonic Model 790015)	B. 15 sources not to exceed 100 microcuries each Total: 1.5 millicuries	B. Possession only of Panasonic Model UD-7900M Automatic TLD Reader pursuant to U.S.NRC Exempt Distribution License No. 29-27907-01E.

9. Radioactive material shall only be stored and used at:

Site Number

000

Location

Georgetown - 3527 Snead Drive

- Each site shall maintain documents and records pertinent to the operations at that site. Copies of all documents and records required by this license shall be maintained for Agency review at Site 000.
- This license does not authorize the assembly, manufacturing and/or distribution of radioactive material or radiation-source-containing devices.
- The individual designated to perform the functions of Radiation Safety Officer (RSO) for activities covered by this license is Ron Smith.
- Radioactive material shall be used by, or under the direct supervision of, individuals designated by the RSO only after each worker has successfully completed a training course determined by the Agency as appropriate. Documentation verifying the successful completion of the training for each worker shall be maintained by the licensee for inspection by the Agency.
- The licensee shall comply with the provisions (as amended) of Title 25 Texas Administrative Code (TAC) §289.201, §289.202, §289.203, §289.204, §289.205, §289.251, §289.252 and §289.257.



Department of State Health Services

RADIOACTIVE MATERIAL LICENSE

LICENSE NUMBER	AMENDMENT NUMBER
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15. Sealed sources containing radioactive material shall not be opened.
16. The licensee shall conduct a physical inventory every six months to account for all sealed sources received, transferred and possessed under the license. The records of the inventories shall be maintained for inspection by the Agency for three years from the date of the inventory and shall include the radionuclide, number of curies, unique identifying number or serial number, location of each source of radiation, the name of the individual making the inventory, and the date of the inventory.
17. This license does not authorize the distribution of exempt quantities of byproduct or source material.
18. The licensee shall comply with the radioactive material import/export requirements specified in Title 10 Code of Federal Regulations (10 CFR) Part 110.
19. Except as specifically provided otherwise by this license, the licensee shall possess and use the radioactive material authorized by this license in accordance with statements, representations, and procedures contained in the following:

application dated May 19, 2015,
electronic correspondence dated July 7, 2015, and
letter dated July 16, 2015, and

Title 25 TAC §289 shall prevail over statements contained in the above documents unless such statements are more restrictive than the regulations.

SEG:seg

FOR THE DEPARTMENT OF STATE HEALTH SERVICES

Date July 22, 2015

Jason M Kelly

Jason M Kelly, MPH, CPH, Program Coordinator
Advanced Technology Licensing Program