



Trijicon, Inc.

ISO 9001 Certified

49385 Shafer Ave. • P.O. Box 930059 • Wixom, MI 48393-0059 USA

PHONE: 248-960-7700 FAX: 248-960-7725

www.trijicon.com

July 31, 2005

Materials Licensing Branch
U.S. Nuclear Regulatory Commission, Region III
2443 Warrenville Rd.
Suite 210
Lisle, IL 60532-4532

Subject: Renewal of Materials License No. 21-19874-01 and Amendment of
Registry of Radioactive Seal Sources and Devices License No.
NR-418-D-101-E

To Whom It May Concern:

We respectfully request a renewal of our Exempt Materials License No.
21-19874-01.

Reference: Completed NRC Form 313 and below addressed ITEMS 5
THROUGH 11 PER NRC Form 313 and Condition 12 per Materials
License No. 21-19874-01.

We respectfully request an amendment to our Registry of Radioactive
Sealed Sources and Devices License No. NR-418-D-101-E.

Reference: Updated ITEMS 5C and 5E

We would like to address a copy of the letter sent to Trijicon from the
US NRC to Jakob Baenziger of MB-Microtec AG dated 4-21-05

Reference: United States Nuclear Regulatory Commission Letter to
Jakob Baenziger of MB-Microtec AG

Enclosed is the completed form 313. Please contact me if you have any
questions.

Thank you.

Sincerely,

Darin Schick
Engineering Manager

Enclosed: NRC Form 313 and continuation pages (2 copies)

CC: Dr. John P. Jankovich

NRC FORM 313

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 08/31/2002

(8-2000)
10 CFR 30, 32, 33,
34, 35, 36, 39, and 40

APPLICATION FOR MATERIAL LICENSE

Estimated burden per response to comply with this mandatory collection request: 7.4 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the Records Management Branch (T-6 E6), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by Internet e-mail to bjs1@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0000), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND,
MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA,
RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

LICENSING ASSISTANT SECTION
NUCLEAR MATERIALS SAFETY BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO
RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA,
SEND APPLICATIONS TO:

SAM NUNN ATLANTA FEDERAL CENTER
U. S. NUCLEAR REGULATORY COMMISSION, REGION II
61 FORTYTH STREET, S.W., SUITE 23785
ATLANTA, GEORGIA 30303-8931

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
801 WARRENVILLE RD.
LISLE, IL 60532-4351

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
LOUISIANA, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA,
OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR
WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING SECTION
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-6064

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- ☐ A. NEW LICENSE
☐ B. AMENDMENT TO LICENSE NUMBER
☒ C. RENEWAL OF LICENSE NUMBER

21-19874-01

2. NAME AND MAILING ADDRESS OF APPLICANT (include ZIP code)

Trijicon, Inc.
49385 Shafer Ave
Wixom, MI 48393

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

49385 Shafer Ave.
Wixom, MI 48393

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Darin W. Schick

TELEPHONE NUMBER

(248) 960-7700 ext 127

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

a. Element and mass number, b. chemical and/or physical form, and c. maximum amount
which will be possessed at any one time. SEE ATTACHED

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED.

SEE ATTACHED

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE.

SEE ATTACHED

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

SEE ATTACHED

9. FACILITIES AND EQUIPMENT.

SEE ATTACHED

10. RADIATION SAFETY PROGRAM.

SEE ATTACHED

11. WASTE MANAGEMENT.

SEE ATTACHED

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY N/A AMOUNT ENCLOSED : N/A

13. CERTIFICATION (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 (22 STAT. 749) MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Stephen G. Bindon - President

SIGNATURE

[Signature]

DATE

7-29-05

FOR NRC USE ONLY

TYPE OF FEE FEE LOG FEE CATEGORY AMOUNT RECEIVED CHECK NUMBER COMMENTS

5

APPROVED BY

DATE

ITEMS 5 THROUGH 11 PER NRC Form 313

Item 5. Radioactive Material

a. Element and Mass Number

- A. Hydrogen-3
- B. Hydrogen-3
- C. Hydrogen-3
- D. Carbon-14
- E. Uranium depleted in Uranium-235

b. Chemical and/or Physical Form

Current Materials License

- A. Sealed sources (MB Microtec A.G. Model T4303-1)
- B. Sealed sources (Any sealed sources manufactured by MB Microtec A.G.)
- C. Sealed light sources (MB Microtec A.G. Model 400 Series)
- D. Sealed sources (MB Microtec A.G.)
- E. Metal

NEW Materials License request:

Section B

F. The TX xxx Series Gun Sights were added to our Registry of Radioactive Sealed Sources and Devices No: NR-0418-D-101-E and License No. 21-19874-02E May 14, 2003. These sources are 250 mCi maximum activity. We need to update section B "Sealed sources (Any sealed sources manufactured by MB Microtec A.G.)" to allow for the 250mCi lamps for the TX xxx Series gun sights as shown below.

- A. Sealed sources (MB Microtec A.G. Model T4303-1)
- B. Sealed sources (Any sealed sources manufactured by MB Microtec A.G. including Model 400 Series)
- C. Sealed light sources (MB Microtec A.G. Model 400 Series)
- D. Sealed sources (MB Microtec A.G.)
- E. Metal

c. Maximum amount which will be possessed at any one time

Current Materials License

- A. No single source to exceed 80 millicuries, 800 curies total
- B. No single source to exceed 2 curies, 100 curies total
- C. No single source to exceed 100 millicuries, 3,000 curies total
- D. No single source to exceed 200 microcuries, 500 millicuries total
- E. 15 Kilograms

NEW Materials License request:

Over the past eight years, Trijicon Inc. has experienced tremendous growth due to the United States Military demands. Certain product lines have

experienced more than 45% growth from 2002 to 2005. Trijicon's current inventory meets the maximum values in the current materials license. To meet future demands of the military and commercial customers, Trijicon Inc. needs to request the increase of the maximum amount of Hydrogen-3 which will be possessed at any one time.

Section B

The TX xxx Series Gun Sights were added to our Registry of Radioactive Sealed Sources and Devices No: NR-0418-D-101-E and License No: 21-19874-02E May 14, 2003. These sources are 250 mCi Maximum activity. We need to update section B "No single source to exceed 2 curies, 100 curies total" to allow for the 250mCi lamps for the TX xxx Series Gun Sights as shown below.

Section C

Based on Trijicon's growth from 2002 to 2005 we have calculated the projected growth out to 2008 based on historical data and future sales projections. The increase of the maximum values (curies total) will need to increase based on these calculations.

We would like to request that are new Materials License be amended to the values shown below under the "NEW Materials License."

NEW Materials License

- A. No single source to exceed 80 millicuries, 800 curies total
- B. No single source to exceed 2 curies, 10,000 curies total
- C. No single source to exceed 100 millicuries, 10,000 curies total
- D. No single source to exceed 200 microcuries, 500 millicuries total
- E. 15 Kilograms

Item 6. Purposes for which licensed material will be used.

Pursuant to 10 CFR Section 32.22 we will distribute sealed light sources in gunsights or scopes in the categories listed below to persons exempt from the requirements for a license defined by 10 CFR 30.19.

(b)(4)

5 pages withheld in their entirety
exemption 4