



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

March 25, 2020

Mr. Brian Sayers,
Director of Operations
DHL Supply Chain
360 Westar Boulevard
Westerville, OH 43082-7627

SUBJECT: DHL SUPPLY CHAIN, REQUEST FOR ADDITIONAL INFORMATION FOR A
NEW EXEMPT DISTRIBUTION LICENSE

Dear Mr. Sayers:

This letter refers to your application dated February 17, 2020, Agencywide Documents Access and Management System (ADAMS) Accession no. ML20055E703 and received by our office on February 20, 2020. In reviewing your application, we have determined additional information is required to complete our review. In order to continue our review, please address the issues listed below. This information is required by Title 10 of the *Code of Federal Regulations* (10 CFR) Section 32.14, "Certain items containing byproduct material; requirements for license to apply or initially transfer;" and 10 CFR 40.52, "Certain items containing source material; requirements for license to apply or initially transfer."

1. 10 CFR Paragraph 40.13(c)(1) (iv) requires that each electric lamp does not contain more than 50 milligrams of thorium. In your application, on page 1, it stated, "Tungsten metal alloy (with 2% Th by weight)," and in Appendix A, page 4, it stated "...thoriated tungsten with 2 weight percent or less of thorium oxide....," and also stated, "Some lamps contain a thorium iodide ThI₄ admixture of ≤ 4 weight percent....". Please explain the discrepancy, and what is the maximum weight of thorium in each lamp which contain 4% thorium by weight.
2. Submit the proposed method of labeling or marking each unit, and/or its container with the identification of the initial transferor of the product and the radioactive material in the product. The samples of labeling in Appendix A of your application included radioactive material, however, they do not identify the initial transferor of the product.
3. Provide, the radiation level of krypton-85 lamps and the method of measurement.
4. Please submit a list of lamp models that containing krypton-85 and thorium.

We will continue our review upon receipt of this information. If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to pursue your application.

Please be aware that upon your request, proprietary information submitted to the U.S. Nuclear Regulatory Commission (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 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAM). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, you may contact me at (301) 415-7640, or by electronic mail at Shirley.Xu@nrc.gov.

Sincerely,

/RA/

Shirley S. Xu
Materials Safety and Tribal Liaison Branch
Division of Material Safety, Security, States,
and Tribal Program
Office of Nuclear Material Safety
and Safeguards

Docket No. 030-39218
Mail Control No. 618062

DHL SUPPLY CHAIN, REQUEST FOR ADDITIONAL INFORMATION FOR A NEW EXEMPT
DISTRIBUTION LICENSEDate: March 25, 2020**ML20085F668**

OFFICE	MSTR/MSTB	MSTR/MSTB	MSTR/MSTB
NAME	SXu	TBrockington	SXu
DATE	03/25/2020	03/25/2020	03/25/2020

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