

**From:** [sschlitt@jwnorthamerica.com](mailto:sschlitt@jwnorthamerica.com)  
**To:** [Struckmeyer, Richard](#)  
**Subject:** [External\_Sender] Response to RAI - Control No. 617996 - Renewal of NRC License: 20-23981-01E  
**Date:** Tuesday, March 24, 2020 4:14:11 PM  
**Attachments:** [2nd JWNA Response to RAI - Control No. 617996.pdf](#)

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Hello Mr. Struckmeyer,

Please find attached an amendment / addendum to our original response to your RAI.

We are hopeful that our renewal application is now sufficiently in compliance with regulations to be granted a renewal.

However, if you need additional information or clarification, of course, please contact me via email or mobile phone.

Thank you,  
Steven

*Steven Charles Schlitt  
Director of Engineering and Quality Assurance  
JW North America, Inc.  
Office: 781-331-0949 X107  
Cell: 781-534-0574*

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**From:** Struckmeyer, Richard <Richard.Struckmeyer@nrc.gov>  
**Sent:** Tuesday, March 24, 2020 12:22 PM  
**To:** [sschlitt@jwnorthamerica.com](mailto:sschlitt@jwnorthamerica.com)  
**Subject:** RE: RE: JWNA Response to RAI Control No. 617996 - Renewal of NRC License: 20-23981-01E

Mr. Schlitt,

You have interpreted my email correctly. You can use either the name or the license number or both, although there is no need for both. So the answer to your last question is "yes."

Richard K. Struckmeyer  
Materials Safety Licensing and Tribal Liaison Branch  
Division of Materials Safety, Security, State, and Tribal Programs  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
301-415-5477

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**From:** [sschlitt@jwnorthamerica.com](mailto:sschlitt@jwnorthamerica.com) <[sschlitt@jwnorthamerica.com](mailto:sschlitt@jwnorthamerica.com)>

**Sent:** Tuesday, March 24, 2020 12:16 PM

**To:** Struckmeyer, Richard <[Richard.Struckmeyer@nrc.gov](mailto:Richard.Struckmeyer@nrc.gov)>

**Subject:** [External\_Sender] RE: JWNA Response to RAI Control No. 617996 - Renewal of NRC License: 20-23981-01E

Hello Richard,

Thank you for your quick response.

So, if I understand you correctly, we can change the container labels that I submitted in my letter to indicate **JW North America, Inc.**, (the Initial Transferor/ Licensee) instead of the German supplier “**BLV...** “ and that will satisfy the requirements. This assumes that NRC recognizes that we have insufficient space on our products to label with our company name.

Am I interpreting your email correctly ? Should I re-submit labels with our company name in place of the “manufacturer” ?

One other question: I think I read that it would be admissible to make a statement such as “ Distributed under USNRC License No. 20-23981-01E”. Would that be a viable option rather than labeling the Transferor ?

Thanks,  
Steven

*Steven Charles Schlitt  
Director of Engineering and Quality Assurance  
JW North America, Inc.  
Office: 781-331-0949 X107  
Cell: 781-534-0574*

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**From:** Struckmeyer, Richard <[Richard.Struckmeyer@nrc.gov](mailto:Richard.Struckmeyer@nrc.gov)>

**Sent:** Tuesday, March 24, 2020 11:12 AM

**To:** Steven Schlitt <[sschlitt@jwnorthamerica.com](mailto:sschlitt@jwnorthamerica.com)>

**Subject:** RE: JWNA Response to RAI Control No. 617996 - Renewal of NRC License: 20-23981-01E

Mr. Schlitt,

The regulations require that the licensee "Label or mark each unit ... and its container so that the manufacturer or initial transferor of the product and the byproduct material in the product can be identified." I recognize that this is not made especially clear, but the manufacturer or initial transferor here refers to the licensee. Therefore, the initial transferor should be identified on each product. The reason is that the regulatory requirements apply to licensees who may be manufacturers or initial transferors, or both. You may put the manufacturer on the shipping containers if desired, so it would not be necessary to change the existing labels.

As you noted, if an electron tube is too small to label, then the label should be placed on the next smallest container or its immediate container, such as the bubble pack containing the electron tube. You should add a label to the product container(s) that identifies the initial transferor.

This is my initial observation upon receipt of your response. I will let you know if I have any further questions.

Regards,

Richard K. Struckmeyer  
Materials Safety Licensing and Tribal Liaison Branch  
Division of Materials Safety, Security, State, and Tribal Programs  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
301-415-5477

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**From:** Steven Schlitt <[sschlitt@jwnorthamerica.com](mailto:sschlitt@jwnorthamerica.com)>  
**Sent:** Monday, March 23, 2020 2:39 PM  
**To:** Struckmeyer, Richard <[Richard.Struckmeyer@nrc.gov](mailto:Richard.Struckmeyer@nrc.gov)>  
**Subject:** [External\_Sender] JWNA Response to RAI Control No. 617996 - Renewal of NRC License: 20-23981-01E

Hello Mr. Struckmeyer,

I hope you are doing well in these extremely troubling times !

Attached is our response to you recent RAI letter in which you noted insufficiencies in our proposed labeling. The upshot of it is that due to the size limitations of our products, we are requesting that we be permitted to relocate the Manufacturer's/Transferor's name and the identification of the byproduct materials from the lamps to the immediate package in which each lamp (electron tube) is contained. This is partially fulfilled, already.

As mentioned in the closing notes in my response letter, our physical office will officially close tomorrow until, at least, April 7. Hopefully, our state government will

allow us, and all the other (non-essential) businesses to re-open on that date. In the meantime, like you, I will be working out of a home-office.

You can correspond with me via email and my mobile phone, as necessary.

Best regards,  
Steven

*Steven Charles Schlitt*  
*JW North America, Inc.*  
*Director of Engineering and Quality Assurance*  
*781-331-0949 (Office)*  
*781-534-0574 (Cell)*

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**From:** Struckmeyer, Richard [<mailto:Richard.Struckmeyer@nrc.gov>]  
**Sent:** Wednesday, March 18, 2020 5:20 PM  
**To:** [sschlitt@jwnorthamerica.com](mailto:sschlitt@jwnorthamerica.com)  
**Subject:** Copy of letter requesting additional information for renewal of NRC exempt-distribution license

Mr. Schlitt,

Due to the COVID-19 situation, most NRC HQ employees are teleworking, making it somewhat less efficient to get letters into the mail, so I am attaching a copy of our Request for Additional Information in response to your application for license renewal.

You should receive a paper copy within a week or so, but you do not need to wait for it to provide a response to my letter. To keep the process moving, you may want to send your response by email. If so, please attach a signed letter as a scanned copy. If that is not currently possible, please follow up at your earliest convenience with a signed copy.

Regards,

Richard K. Struckmeyer  
Materials Safety Licensing and Tribal Liaison Branch  
Division of Materials Safety, Security, State, and Tribal Programs  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
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