

Roger K. Stevens
Spectrum Techniques
182 Midway Lane
OAK RIDGE, TN 37830

June 24, 1996

Susan Greene
Mail Stop T8F5
USNRC
WASHINGTON, DC 20555

Dear Ms. Greene:

Before proceeding with distribution of Exempt Quantity Material under license No. 41-23845-01E, we would like clarification on several points.

- 1). Many of our customers are companies involved in the purchase and exporting of educational instruments and material including exempt quantities sources from Spectrum Techniques. This equipment will be packaged at our facility and shipped to their warehouse for consolidation before being transferred to a freight carrier for overseas shipment. Does this action qualify under Part 30.13 "Carriers", and are these companies exempt from Byproduct licensing regulations providing the Exempt Material is exported in a timely manner and not purchased for stock ?
- 2). What is a good definition for Warehousemen under Part 30.13 regarding shipment and sales for domestic customers? Can these same companies purchase Exempt Quantity material from Spectrum Techniques for shipment to their warehouse prior to reshipment to the final customers exempt under part 30.18 ?

In all cases each package will contain no more than 10 Exempt Quantities as defined in Part 30.71 Schedule B and meet all packaging requirements. Generally the original shipping carton from Spectrum Techniques will be simply relabelled and forwarded to the final recipient but in some instances our cartons may be over-packaged with the companies proprietary carton before forwarding. Please keep in mind that the cartons usually contain a total of less than 10 microcuries of byproduct material for educational purposes. The unit price of \$30.00 per item makes multiple distribution licenses cost prohibitive.

Sincerely,



Roger K. Stevens, President.