

TRUGLO®, Inc.
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March 23, 2021

Mr. Tomas Herrera
Nuclear Materials Licensing Branch
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Re: Request for Amendment to Add a Second Facility Address for Distribution (Shipping) Purposes Only of Exempt Product for TRU-GLO, Inc., USNRC License Number 42-23889-01E and Device Registration Certificate NR-1180-D-101-E

Dear Mr. Herrera,

This letter is submitted as an attachment to NRC Form 313, Application for Materials License - Request for Amendment, submitted this same day by TRU-GLO, Inc. ("Licensee"), with respect to USNRC License Number 42-23889-01E, Docket Number 030-36055 (the "License"). Reference is also made to Licensee's device registration certificate NR-1180-D-101-E (the "Certificate"). Licensee seeks approval of an amendment to the existing License regarding the addition of a second facility address for exempt product distribution purposes only. To clarify, the second facility address is intended for shipping purposes only of the exempt "consumer-ready" product. No manufacturing/assembly/packaging of exempt product will occur at the second facility address.

Radioactive Material (NRC Form 313, Item 5)

There will be no changes in the type, form, quantity, use, possession or storage of licensed materials to be possessed by Licensee after the request for amendment is granted by the USNRC. All authorized materials under the License will remain unchanged. There will be no changes in the location, facilities, equipment, radiation safety program, use, possession, or other procedures related to licensed activities with the exception of the addition of a second facility address for exempt product distribution purposes only as we have requested.

Licensee will continue to abide by all constraints, License conditions, requirements, representations, and commitments attributable to the License after the request for amendment is granted by the USNRC.

Licensee has no actions required to be taken to resolve any open inspection and enforcement issues.

Purpose(s) for which Licensed Materials Will Be Used (NRC Form 313, Item 6)

Licensee's use of byproduct, source, and/or special nuclear material, as applicable, will not change after the request for amendment has been granted by the USNRC. There will be no changes to Licensee's authorized uses of licensed materials, all of which will remain unchanged after the request for amendment by the USNRC is granted.

Changes of Personnel (NRC Form 313, Item 7)

The individuals and personnel responsible for Licensee's radiation safety program will not change as a result of the request for amendment being granted. Mr. Charles Lanman is and will remain named on the License as the current Radiation Safety Officer. All personnel with radiation safety oversight components of Licensee's radiation safety program will remain unchanged.

Training for Individuals Working in or Frequenting Restricted Areas (NRC Form 313, Item 8)

Licensee's radiation safety program and radiation safety training program will remain unchanged after the request is granted by the USNRC. Licensee's procedures relating to the License will remain unchanged as well.

Facilities and Equipment (NRC Form 313, Item 9)

There will be no changes in Licensee's facilities, equipment, and locations and places of use, including but not limited to the facilities where licensed material is used and stored, with respect to Licensee's licensed activities with the exception of the requested amendment for the addition of a second facility address for exempt product distribution (shipping) purposes only.

Radiation Safety Program (NRC Form 313, Item 10)

Licensee's radiation safety program will remain unchanged.

Waste Management (NRC Form 313, Item 11)

Licensee's licensed activities do not currently generate any waste, and this will not change after the request for amendment is granted by the USNRC.

Device Registration Certificate NR-1180-D-101-E

Additionally, with respect to Licensee's device registration certificate NR-1180-D-101-E for gun and bow sights containing tritium:

1. There will be no changes to the labeling of the devices;
2. There have been no changes made to the products since the last amendment;

3. All of the previous commitments made by Licensee will continue to be adhered to following granting of the request for amendment; and
4. There will be no changes to the Quality Assurance Program.

Conclusion

In summary, Licensee will continue to operate the same ongoing business after the request for amendment is granted by the USNRC for the addition of a second facility address for the sole purpose of distribution (shipping) of exempt "consumer-ready" product.

The second facility address that we request to add to the License is:

5250 Frye Rd.

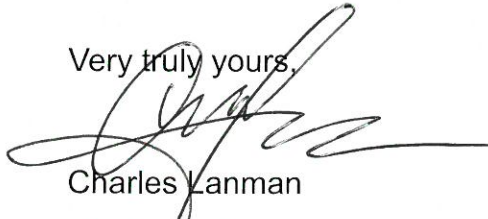
Irving, TX 75061

Please advise if an amendment to our Texas Department of State Health Services License is necessary as well, keeping in mind that only "consumer-ready" exempt distribution product will be distributed from the second facility address.

We thank you in advance for your time and consideration. And we respectfully ask that the USNRC consent to the request for amendment to our Exempt Distribution License.

Please feel free to contact me at (972) 774-0300 or clanman@gsmorg.com if I can provide any additional information regarding this application.

Very truly yours,



Charles Lanman

Radiation Safety Officer

Attachment - NRC Form 313

(01-2020)
10 CFR 30, 32,
33, 34, 35, 36,
37, 39, and 40



APPLICATION FOR MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.3 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 Information Services Branch (T-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to infocollections.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), 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 CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY LICENSING BRANCH
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS
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:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA,
GEORGIA, KENTUCKY, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE,
NEW JERSEY, NEW YORK, NORTH CAROLINA, PENNSYLVANIA, PUERTO RICO,
RHODE ISLAND, SOUTH CAROLINA, TENNESSEE, VERMONT, VIRGINIA, VIRGIN
ISLANDS, OR WEST VIRGINIA,

SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

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
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

IF YOU ARE LOCATED IN:

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
LOUISIANA, MISSISSIPPI, 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 BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

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.

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

☐ A. NEW LICENSE

☒ B. AMENDMENT TO LICENSE NUMBER 42-23889-01E

☐ C. RENEWAL OF LICENSE NUMBER _____

2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code)

TRUGLO, Inc.
525 International Parkway
Richardson, TX 75081

3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

TRUGLO, Inc.
525 International Parkway
Richardson, TX 75081

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Mr. Charles Lanman - Radiation Safety Officer

BUSINESS TELEPHONE NUMBER
972-774-0300

BUSINESS CELLULAR TELEPHONE NUMBER
214-934-9621

BUSINESS E-MAIL ADDRESS
clanman@gsmorg.com

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.

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

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

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

9. FACILITIES AND EQUIPMENT.

10. RADIATION SAFETY PROGRAM.

11. WASTE MANAGEMENT.

12. LICENSE FEES (Fees required only for new applications, with few exceptions*)

(See 10 CFR 170 and Section 170.31)

*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.

FEE CATEGORY	AMOUNT ENCLOSED \$
N/A	0.00

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html>.

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

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, 37, 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 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILFULLY 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

Charles Lanman, Radiation Safety Officer

SIGNATURE

DATE

3/23/21

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	