



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

November 30, 2021

Mr. James Lee, MD
Laboratory Direction
Inter Science Institute
944 West Hyde Boulevard
Inglewood, CA 90302

SUBJECT: INTER SCIENCE INSTITUTE REQUEST FOR ADDITIONAL INFORMATION
CONCERNING RENEWAL APPLICATION FOR AN EXEMPT DISTRIBUTION
LICENSE APPLICATION DATED AUGUST 20, 2021

Dear Mr. Lee:

This letter refers to your application dated August 20, 2021, Agencywide Documents Access and Management System (ADAMS) accession number ML ML21244A374. In reviewing your application, we found that additional information is required to complete our review.

1. Title 10 of the *Code of Federal Regulations* (10 CFR) Section 30.33 requires you to apply for and obtain a specific license authorizing possession and use of radioactive materials from the State of California or from wherever licensed material will be possessed. Please submit a copy of your current State of California license.
2. In accordance with 10 CFR 32.20, please submit your materials transfer reports for calendar years 2019 and 2020.
3. In accordance with 10 CFR 32.18, please confirm that your byproduct material is not contained in any food, beverage, cosmetic, drug, or other commodity designed for ingestion or inhalation by, or application to, a human being.
4. In accordance with 10 CFR 32.18, please confirm that your byproduct material is in the form of processed chemical elements, compounds, or mixtures, tissue samples, bioassay samples, counting standards, plated or encapsulated sources, or similar substances, identified as radioactive and to be used for its radioactive properties, but is not incorporated into any manufactured or assembled commodity, product, or device intended for commercial distribution.
5. In accordance with 10 CFR 32.18, please submit copies of prototype labels and brochures for approval. The label affixed to the immediate container, or an accompanying brochure, shall (1) state that the contents are exempt from U.S. Nuclear Regulatory Commission (NRC) or Agreement State licensing requirements; (2) bear the words "Radioactive Material--Not for Human Use--Introduction Into Foods, Beverages, Cosmetics, Drugs, or Medicinals, or Into Products Manufactured

for Commercial Distribution is Prohibited -- Exempt Quantities Should Not be Combined"; and (3) set forth appropriate additional radiation safety precautions and instructions relating to the handling, use, storage, and disposal of the radioactive material.

6. In accordance with 10 CFR 32.19, please confirm that no more than 10 exempt quantities set forth in 10 CFR 30.71, Schedule B shall be sold or transferred in any single transaction. For purposes of this requirement, an individual exempt quantity may be composed of fractional parts of one or more of the exempt quantities in 10 CFR 30.71, Schedule B of this chapter, provided that the sum of such fractions shall not exceed unity.
7. In accordance with 10 CFR 32.19, please confirm that each quantity of byproduct material set forth in 10 CFR 30.71, Schedule B of this chapter shall be separately and individually packaged. No more than 10 such packaged exempt quantities shall be contained in any outer package for transfer to persons exempt pursuant to 10 CFR 30.18 of this chapter. The outer package shall be such that the dose rate at the external surface of the package does not exceed 0.5 millirem per hour.
8. In accordance with 10 CFR 32.19, please confirm that the immediate container of each quantity or separately packaged fractional quantity of byproduct material shall bear a durable, legible label which (1) identifies the radioisotope and the quantity of radioactivity, and (2) bears the words "Radioactive Material."

To continue review of your application, we request that you submit your response to this letter within 30 calendar days from the date of this letter. In your response, please refer to the license, docket, and control number specified below.

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 ADAMS. 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) 415-3257, or by electronic mail at Michelle.Hammond@nrc.gov.

Sincerely,

/RA/

Michelle M. Hammond, M.Sc.
Materials Safety and Tribal Liaison Branch
Division of Materials Safety, Security, State,
and Tribal Programs
Office of Nuclear Materials Safety
and Safeguards

License No. 04-17814-01E
Docket No. 030-13376
Mail Control No. 628375

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DATE: November 30, 2021

ADAMS Accession Number: ML21334A019

OFFICE	MSST/MSTB	MSST/MSTB	MSST/MSTB	MSST/MSTB
NAME	MHammond	TBrockington	SXu	MHammond
DATE	11/22/2021	11/30/2021	11/29/2021	11/30/2021

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