

June 3, 2014

Bill Huckabee  
Radiation Safety Officer  
Ludlum Measurements, Inc.  
501 Oak Street  
P.O. Box 810  
Sweetwater, TX 79556

SUBJECT: LUDLUM MEASUREMENTS, INC., REQUEST FOR ADDITIONAL  
INFORMATION CONCERNING LICENSE AMENDMENT REQUEST

Dear Mr. Huckabee:

This refers to your license amendment request, dated April 17, 2014. In reviewing your application, we found that additional information is required

1. 10 CFR 32.19(b) requires that each exempt quantity of byproduct material shall be separately and individually packaged and that 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. Furthermore, 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.
  - a. Please provide assurance, explicitly, that no more than 10 individual units shall be contained in any outer package for transfer.
  - b. Please provide assurance that the dose rate at the external surface of the outer package does not exceed 0.5 millirem per hour, and indicate the method of measurement and/or calculation by which you came to this conclusion.
2. 10 CFR 19(c) requires that the label for separately packaged quantity of byproduct material must identify the radioisotope and the quantity of radioactivity and must bear the words "Radioactive Material."
  - a. For the check source to be attached via an adhesive tape mounting on a polycarbonate enclosure, you have provided information and diagrams describing and depicting the label which will be used to secure the source to the device. The label, as depicted, includes the phrasing "DO NOT REMOVE," but this label does not provide information regarding the radioisotope or associated radioactivity. Please provide a revised diagram, depicting a label that displays the required indication of radioisotope identification and level of radioactivity.
  - b. For the check source to be attached via a mechanically attached check source holder on a polycarbonate enclosure, you have provided a diagram depicting the label which will be placed on the outside of the source holder. The label, as depicted, does not provide information regarding the radioisotope or associated radioactivity. Please provide a revised diagram, depicting a label that displays the required information on radioisotope identification and level of radioactivity.

3. 10 CFR 19(d) requires that the label affixed to the immediate container of the quantity of byproduct material or an accompanying brochure must (1) state that the contents are exempt from 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. Please provide a diagram or description of the labeling or accompanying brochure that meets these requirements.

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.

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 Agencywide Documents Access and Management System (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) 415-6684, or by electronic mail at [Justin.Vazquez@nrc.gov](mailto:Justin.Vazquez@nrc.gov). Any correspondence regarding your exempt-distribution license renewal application should reference mail control number 583799, and a copy of any such correspondence should also be addressed to Shirley Xu.

Sincerely,

**/RA/**

Justin A. Vazquez,  
Licensing Branch  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials and  
Environmental Management Programs

License No. 42-21454-01E  
Docket No. 030-20785

3. 10 CFR 19(d) requires that the label affixed to the immediate container of the quantity of byproduct material or an accompanying brochure must (1) state that the contents are exempt from 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. Please provide a diagram or description of the labeling or accompanying brochure that meets these requirements.

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Sincerely,

**/RA/**

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 Division of Materials Safety and State Agreements  
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License No. 42-21454-01E  
 Docket No. 030-20785

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DATE	05/28/2014	05/29/2014	05/29/2014	06/03/2014

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