

SAFETY LIGHT CORPORATION

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2 January 1987

U.S. Nuclear Regulatory Commission
Region I
King of Prussia, PA 19406

ATTN: Josephine M. Piccone, Ph.D.

RE: USNRC License No. 37-00030-08, Letters Dated 31 October 1986
and 23 December 1986 from J. Miller to USNRC & Mail Control
#106373.

Dear Dr. Piccone:

This letter will serve to clarify the questions asked during our telephone conversation of 30 December 1986 concerning Safety Light Corporation's waste disposal program. As I indicated in my 23 December 1986 letter, we are presently analyzing three different methods of reducing the amount of waste in our possession as well as investigating additional possibilities to resolve this problem. As of this date we do not have an answer to any one of the methods being analyzed.

Two of the methods being considered are within our control; recovery of tritium from our products will take time and money involving research and development while sales of acceptable returned products will not solve the entire waste problem. Consequently unless another solution evolves, we are currently left with burial at a licensed disposal site. As I indicated in my 23 December 1986 letter, this particular solution is well beyond our control because of the uncertainties that exist in the ever-changing rules and regulations specified by the land burial method.

We are being told by the USNRC that we have to commit to a maximum percent of our total possession limit attributed to waste. The suggested limit of waste is 10%. We indicated previously that we would use 10% as a maximum guideline, however this was not acceptable to the Commission. I remain concerned that committing to an exact quantitative figure given the uncertainties mentioned above could have serious ramifications to the future of Safety Light Corporation.

Let me try to phrase our commitment in a slightly different manner to demonstrate that our intent is indeed to resolve this problem if we are in control of the circumstances. Safety Light Corporation will use 10% of our total tritium possession limit as a maximum allowable limit attributed to waste, providing that feasible methods of land burial exist and that no other circumstances beyond our control prevent us from continuing with our waste disposal program.

SAFETY LIGHT CORPORATION

U.S. Nuclear Regulatory Commission
Dr. Josephine M. Piccone
2 January 1987
Page 2

We are continuing to investigate a definite method of packaging for land burial and, if successful, it is our intention to dispose of waste using this method in 1987.

We hope this clarifies your questions concerning this issue and request that you grant us, as expeditiously as possible, our possession limit increase to 350,000 Curies of hydrogen-3, so that we may continue with our on-going airfield contract for the U.S. Air Force.

Very truly yours,
SAFETY LIGHT CORPORATION


Jack Miller
President

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