



030-38459

Light Sources, Inc.

37 Robinson Boulevard, Orange, CT 06477
FAX (203) 795-LAMP PHONE (203) 799-7877
E-mail: gczako@light-sources.com

5/20/2011

Office of Federal & State Materials and
Environmental Management Programs
Division of Materials Safety and State Agreements
Washington, DC 20555-0001

Dear Sir/Madam,

Enclosed is a NRC form 313 for an Application for Distribution of Exempt Products. We have already filed the attached documentation for an application to possess materials to the following address:

U.S. Nuclear Regulatory Commission, Region 1
475 Allendale Rd.
King of Prussia, PA 19406-1415

We have recently partnered with a manufacturer of UV producing lamps called Radium Lampenwek located in Wipperfurth, Germany. Radium currently produces a variety of lamps which are already sold and licensed in the U.S. with the NRC through the companies Superior UV Technologies, 17 Centerview Drive, Shelton, CT 06484 and through Supra Brands Group LLC, 4860 Linda Vista Ave., Napa, CA, 94558. Both of these companies have a possession and distribution of exempt products licenses. These lamps are all currently licensed with the NRC since they contain a very small amount of Kr-85 to aid in the starting of the lamps. All of the lamp models they are currently selling are also registered with the FDA under 21 CFR 1040.20 for use in products used in the indoor tanning industry.

Since we have a partnership with the Radium company we plan to be the direct importer of the lamps to the U.S. and will redistribute the lamps from our warehouse to the two companies listed above. All of the existing labeling, warnings, and specifications for the products will remain unchanged. In the future we expect that there will be additional brands and lamp models and updated reports will follow as the products become needed.

Please review the attached documentation and contact me directly regarding any problems or questions on the application.

Sincerely,

Eugene Czako,
Sr. Development Engineer
Light Sources, Inc.

575400

NRC FORM 313 (3-2009) 10 CFR 30, 32, 33, 34, 35, 36, 39, and 40	U.S. NUCLEAR REGULATORY COMMISSION	APPROVED BY OMB: NO. 3150-0120 EXPIRES: 3/31/2012			
<h2 style="margin: 0;">APPLICATION FOR MATERIALS LICENSE</h2>					
INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.					
APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH: OFFICE OF FEDERAL & STATE MATERIALS AND ENVIRONMENTAL MANAGEMENT PROGRAMS DIVISION OF MATERIALS SAFETY AND STATE AGREEMENTS U.S. NUCLEAR REGULATORY COMMISSION WASHINGTON, DC 20555-0001	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				
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 475 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1415	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 612 E. LAMAR BOULEVARD, SUITE 400 ARLINGTON, TX 76011-4125				
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) <input checked="checked" type="checkbox"/> A. NEW LICENSE <input type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER _____ <input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____	2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code) Eugene Czako Light Sources, Inc. 37 Robinson Blvd., Orange, CT 06477				
3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED Light Sources, Inc. 37 Robinson Blvd Orange, CT 06477	4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION Eugene Czako TELEPHONE NUMBER (203) 799-7877				
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 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 (See 10 CFR 170 and Section 170.31) FEE CATEGORY 03251 AMOUNT ENCLOSED \$ 10,100.00				
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, 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 WILLFULLY 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 Eugene Czako - Sr. Development Engineer	SIGNATURE 	DATE 6/7/2011			
FOR NRC USE ONLY					
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED \$	CHECK NUMBER	COMMENTS
APPROVED BY				DATE	

NRC Form 313 Questions 5-11

5.
 - a) Kr-85 gas
 - b) Low Pressure gas mix used in quartz mercury vapor lamps.
 - c) The manufacturer purchases 100% Argon with 0.05mCi Kr-85/L and specifies a maximum quantity of 0.120 microcuries per lamp. A copy of the certificate for the gas is attached. The total quantity of the gas is determined by the volume of the lamp and the fill pressure in the lamp. This pressure is checked routinely by the manufacturer and allows an easy calculation on the total material in the lamps. The total annual sales volume for the U.S. market is estimated to be well under 80,000 lamps so we expect that we will maintain an inventory of less than 40,000 lamps to meet the market demand for all of the distributors in the U.S market.
6. The purpose of this material is to aid in the starting of mercury vapor lamps. These lamps are typically known as High pressure mercury vapor lamps and are generally used for the purpose of generating UV light for the Indoor tanning industry.
7. We have a variety of annual safety training programs and programs for handling any forms of hazardous waste. We have a contract with GZA GeoEnvironmental Services in Bloomfield, CT for consulting of all waste and hazardous materials and for setting up all of our safety and waste programs. We have an emergency clean up contract with Veolia Environmental Services in Newington, CT for handling any hazardous clean up emergencies and disposal of any regulated waste materials and use Northeast Lamp Recycling for disposal of all of the waste lamps we handle which contain mercury falling under Universal Waste regulations. We have an in house Environmental and Safety engineer named Earl Digioia who oversees all of our safety and waste handling procedures to be sure we meet the handling requirements for both the Federal and state of Connecticut. His responsibilities include keeping the records and manifests for disposal of all waste streams from our building.
8. As mentioned in Item 7 above, we have a variety of trained in house personnel for safety and emergency clean up. During the past week I had a 2 day meeting with the manufacturer in Europe for training and handling of these products. We also have contracted outside waste management and emergency clean up facilities to handle our hazardous waste materials.
9. Our facilities consist of an area of approximately 200,000 square feet. About 70% of the building is used for the manufacturing of specialty fluorescent lamps and low pressure mercury vapor quartz lamps used primarily for purification of water. The remaining 30% of the building is used for warehouse space, shipping, and office space. There are approximately 250 employees at this location. The lamps we will import are small. Please see the attached drawings enclosed in the report. The typical packaging for each item is about 1.5" x 1.5" x 8" for a total space of only about 1,000 cubic feet to store the expected inventory volume. Light Sources, Inc. is a registered company under the international quality standard ISO9001:2008 for "The Design and Manufacture of Specialty Lamps, Gas Discharge Lamps, Tanning Lamps, and Germicidal Lamps" since 2001 and maintains all of our quality and inventory records on site. An accurate inventory of shipped and received products is maintained daily and a full inventory count is done at least twice yearly. We have a caged area in the plant to control and limit the access to quality controlled and special inventoried products.

10. We currently have a variety of safety training programs. We do not currently have a radiation safety program but have contacted GZA GeoEnvironmental Services in Bloomfield, CT to add this to our existing safety and training program at our location. The program is to be initiated before any products are imported to our facilities. We will not be handling any of the radioactive gas in house. All of the products will be manufactured at the licensed facilities in Germany as finished and packaged lamps. Since the lamps are all vacuum sealed there will be no exposure of the KR-85 gas to the employees at our facilities. Some labeling of the packaging may be done in house but there will be no processing of the products in house. The immediate plan is to continue to import the products exactly as they are currently licensed with all of the same labeling, packaging, etc. The factory in Europe tests each lamp model before shipping by what is known as an "aging" process. All of the lamps are start tested and operated for a short period of time before packing and shipping. Any defective lamp which may have a potential poor vacuum seal or potential leak will not operate or start during this testing procedure so all bad or defective products will be found and discarded during this testing procedure.
11. We will not be producing any waste from this product other than the disposal of lamps that potentially break during shipping and handling. The expectation of the quantities of yearly rejects should be on the order of perhaps 10 lamps or so. As with any mercury vapor lamp we import or produce the primary hazard is mercury. Any lamps still intact are all handled by 100% recycling through Northeast Lamp recycling. Lamp bodies that may have been broken are handled as separate waste through Veolia Environmental Services.

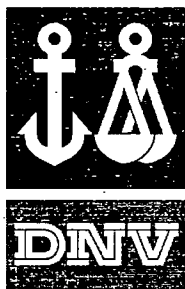
Since many of the lamp models are identical except for the brand names on the lamp we are currently submitting, we plan to develop a method to import some of the lamps with a "Contains KR-85" warning as currently used on the lamps and will also contain a part/specification number to identify the lamps without the brand name on the lamp and packaging. For example: The lamps and boxes will contain the words:

Contains Kr-85
P/N 2789

The part number will describe the details of the specifications of the lamps. Labeling of the brand names or customer branding can be added to the box from a generic inventory this way. This will aid in reducing the inventory quantities needed to supply the industry.

Please see the attachments for drawing, labeling, and descriptions of the currently licensed lamp models. All of the lamp models are completely assembled and tested at the Radium factory in Germany. The factory in Germany is licensed for the safe handling of the KR-85 gas. All quality testing is done prior to shipping to the U.S. In addition to this, most of these lamp models have requirements by the FDA since they are for the indoor tanning industry. This requires in addition to the Kr-85 label a separate reporting requirement for each lamp model and additional warning and user instructions. This also requires an annual report to the FDA on all of the brand models, distribution locations of the products, and quantities sold each year. We have been registered with the FDA and handle our products under Federal Code 21 CFR 1040.20 since 1984.

All of our shipping of products is done in compliance with DOT regulations.



DET NORSKE VERITAS

MANAGEMENT SYSTEM CERTIFICATE

Certificate No. CERT-03305-2004-AQ-HOU-ANAB

This is to certify that

Light Sources, Inc.

at

37 Robinson Boulevard, Orange, CT 06477 USA

has been found to conform to the Management System Standard:

ISO 9001:2008

This Certificate is valid for the following product or service ranges:

**The Design and Manufacture of Specialty Lamps, Gas
Discharge Lamps, Tanning Lamps and Germicidal Lamps**

Initial Certification date:

May 18, 2001

This Certificate is valid until:

December 16, 2012

*The audit has been performed under the
supervision of*

Sherry Bennett
Lead Auditor



Place and date:

Houston, Texas, December 16, 2009

for the Accredited Unit:

DET NORSKE VERITAS
CERTIFICATION INC., HOUSTON TEXAS


Rudy Frueboes
Management Representative

Lack of fulfillment of conditions as set out in the Certification Agreement may render this Certificate invalid.

HEAD OFFICE: Det Norske Veritas Certification, Inc. 1400 Ravello Drive, Katy, Texas 77449. TEL: (281) 396-1000. FAX: (281) 396-1903

Superior UV Technologies

NRC License Documents

**SUPERIOR UV TECHNOLOGIES
(Solar Elements)**

17 Centerview Drive
Shelton, CT 06484

Division of Nuclear Materials Safety
US Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

Br 2

L 23969

03037784

03214

May 23, 2008

Dear Sir/Madam,

(06-23969-01)

Enclosed is our NRC form 313 application for material license.

We are the initial importers of UV lamps produced by Radium Lampenwerk Wipperfurth, Germany who is a subsidiary of Osram Sylvania. Radium produces our lamps in Germany under our trade name of Solar Elements. Our lamps are registered with the FDA as indicated by our FDA #'s below:

FDA #8720182-16
FDA #0120351-15
FDA #9920907-12
FDA #0220025-05
FDA #9221134-20
FDA #0520864-03
FDA #8520252-05

2008 MAY -6 PM 3:03

RECEIVED
REGION I

We do not alter, modify or repackage any of the UV lamps we import prior to delivery to our customers. We warehouse our lamps in Shelton, CT. Our lamps are individually boxed and then packed in cases of 20 prior to shipment from Radium in Germany. We are a very small operation and sell only to a handful of specific customers. We generally possess 1,000 – 1,500 lamps with an annual sales volume of 10,000 lamps. We do not handle the lamps directly in anyway but merely store them prior to distribution to our customers. We utilize a state of the art purchasing, order processing and inventory tracking system. We account for every lamp that comes in and goes out via our system. We do monthly inventory counts and reconciliation and can provide all necessary reports.

We have also applied for an NRC Exempt Distribution License. Below is some additional information on the lamps we import, store and then distribute:

Details of construction and dimensions of the lamp

Please see attached drawings. I have included drawings of the lamp with socket, the burner and the arc tube. The lamp consist of the burner and socket (fixed with cement) only. There is no lamp body since there is no outer bulb.

REC'D IN LAT

JUN 24 2008

142490
NMSS/RCN1 MATERIALS-002

Prototype Testing

After the filling process the lamp voltages of all lamps are monitored. A burner which is not inside the specification is regarded as a possible leaker and is discarded. After putting the socket on the burner all lamps are burnt in. A lamp passing this test is considered to be o.k. because a leaking lamp would not start up.

Labelling

Please see attached copies of the labels used to identify our products. We currently indicate that our lamps contain Kr-85 on the individual box label, the case label and the user instructions included with each lamp. We are in the process of updating the actual lamp etch to include this information as well. Radium expects all future lamps produced as of May 1, 2008 to be etched with Kr-85. The only exception to the etching will be 400watt lamps #100915 and #100916. The ceramic base on these lamps is very small not allowing us the room necessary to add Kr-85.

Measurements

The filling devices are controlled once a week. This is done by controlling the filling pressure of a burner which is actually being produced. The quantity of Kr-85 in the arc tube is a function of the specific activity of the filling gas and the volume of the arc tube. Each tank of the Argon-Krypton-85-mixture received from the supplier comes with a certification concerning the Krypton-85 concentration. The determining parameter for the volume with a given diameter is the pinching distance. This value is controlled twice every shift for each different type.

Quality control

After pinching every burner is checked visually. Burners with cracks or channels in the pinch are discarded. After filling every burner is switched on and the lamp voltage is monitored. Burners not inside the specification are being destroyed. After putting the socket on every lamp is burnt in. Lamps failing this test are being destroyed. During continuous production period's life and reliability tests are performed on a regular basis, e.g. 3 lamps per type and day are tested for electrical parameters and UV-output.

Measurement Certificate from the Kr-85 gas supplier

Attached are two documents from Osram showing a Kr-85 delivery and certificate.

Amount of Gas in lamps

Definition of activity in agreement to the scientific standard is:

activity: radioactive decay (the phenomenon of natural and artificial radioactivity) is defined as one transformation (or decay) per second. The SI unit is Becquerel. 3.7×10^{10} Bq equals 1 Ci.


That means, that the Measured "activity" is an absolute number and is measured independent of the mass of the considered element.

In our quartz lamp it means:

In 1 liter of gas we have 50 microcurie. In 30 milliliters of gas we have
 $30/1000 * 50 \text{ microcurie} = 1.5 \text{ microcurie}$.

I believe I have enclosed all the necessary information. Should there be any additional information needed I will address it at once. Thank you for your assistance and time.

Sincerely,



Robert Klem
Member
Superior UV Technologies
robertk@superioruv.com

NRC FORM 313

(10-2005)

10 CFR 30, 32, 33,
34, 35, 36, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3180-0120

EXPIRES: 10/31/2008

APPLICATION FOR MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.4 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 Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to infocollections@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NE0B-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 APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
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
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

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

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
811 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 78011-4005

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 _____
☐ C. RENEWAL OF LICENSE NUMBER _____

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

Superior UV Technologies
17 Centerview Drive
Shelton, CT 06484

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

17 Centerview Drive
Shelton, CT 06484

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Robert Klem

TELEPHONE NUMBER

(917) 699-8739

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 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 (See 10 CFR 170 and Section 170.31)

FEE CATEGORY 3B AMOUNT ENCLOSED \$4,600

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, 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 WILLFULLY 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

Robert Klem, Member

SIGNATURE



DATE 5/23/08

FOR NRC USE ONLY

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

NRC FORM 313
QUESTIONS 5-11
Superior UV Technologies

5. a) Krypton 85
 b) Gaseous in sealed sources
 c) Max amount per lamp: 4 440Bq (=0.120 Microcurie)
 No more then 3000 lamps
6. Gas filling of UV Tanning lamps to be sold and distributed.
7. Robert Klem
 I have been to Radium in Germany to learn first hand about the proper handling, packaging and storage of the lamps.
8. We are a very small company and do not have or ever expect to have any employees.
9. Our facilities consist of a basement with work benches to store the lamps. Our inventory consists of 1,000 to 2,000 pieces. They are individually boxed and stored in cases of 20 on a wooden work bench. Our total inventory at any given time can fit on a 3' deep and 10' long workbench. We utilize no specific equipment besides a tape gun to over-pack our lamps prior to shipment.
10. We do not have a formal Radiation Safety Program. We do not handle the lamps directly. They are individually packaged and then packed in cases in our factory Radium in Germany prior to shipment to the US. We do not repackage the individual lamps or handle them directly in anyway. We process an average of two orders a day which consists of taking the pre packaged lamps and placing them in a UPS approved shipping box along with proper packaging material.
11. We do not generate any waste besides some cardboard boxes which are recycled. We do receive approximately ten lamps back annually from customers consisting of lamps that did not light. These lamps are collected and stored in their original packaging until they are returned back to Germany. We have contacted Northeast Lamp Recycling out of East Windsor, CT if the need arises for lamp disposal. They are licensed to recycle HID (mercury vapor – high pressure) lamps.

Superior UV Technologies
Inventory Unit Activity Report
For the Period From May 1, 2008 to May 31, 2008

Filter Criteria includes: 1) IDs from BSEQ1000W/230V/PI to BSEQ800W/230V/CI; 2) Active Items; 3) Stock/Assembly. Report order is by ID. Report is printed with Truncated Long Descriptions.

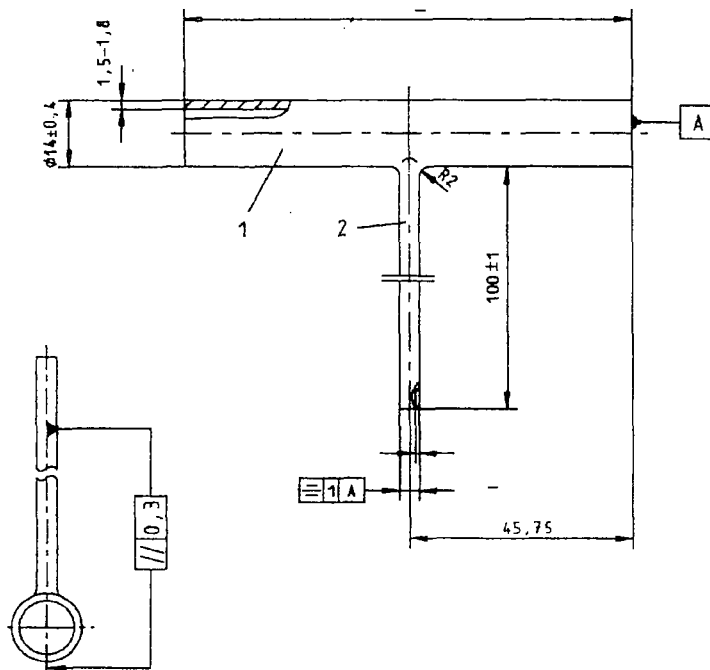
Item ID Item Description	UPC / SK	Beg Qty	Units Sol	Units Purc	Qty on Han
BSEQ1000W/230V/PI SEQ 800-1000WATT PLUG-IN	100925	49.00	82.00	74.00	41.00
BSEQ1000W/230V/SB SEQ 1000WATT STEP BASE	100928	1.00	2.00	50.00	49.00
BSEQ1000W/230V/WL SEQ 800-1000WATT WIRE LEA	100926	23.00	28.00	25.00	20.00
BSEQ1000W/380V/WL SEQ 1000WATT WIRE LEAD	100927	64.00		50.00	114.00
BSEQ1510W/230V/BL SEQ 1510WATT BLADE	100929	15.00	2.00		13.00
BSEQ1530W/230V/PN SEQ 1530WATT PIN	100930	20.00	7.00		13.00
BSEQ2000W/230V/WL SEQ 2000WATT 230V WIRE LEA	100931	5.00			5.00
BSEQ2000W/380V/WL SEQ 2000WATT 380VOLT WIRE	100932a	21.00			21.00
BSEQ2000W/380V/XL SEQ 1000WATT XL WIRE LEAD	100932b	10.00			10.00
BSEQ400-500W/230V/CI SEQ 400-500WATT CLIP-IN	100915	112.00	3.00		109.00
BSEQ400-500W/230V/WL SEQ 400-500WATT WIRELEAD	100916	37.00	7.00		30.00
BSEQ500W/230V/PI SEQ 300-500WATT PLUG-IN	100917	78.00	33.00		45.00
BSEQ600W/230V/WL SEQ 600WATT 230V WIRE LEA	100922a	12.01			12.01
BSEQ610W/230V/BL SEQ 610WATT BLADE	100918	35.00	16.00		19.00
BSEQ620W/230V/SB SEQ 620WATT STEP BASE	100920	4.00		40.00	44.00
BSEQ630W/230V/PN SEQ 630WATT PIN	100919	15.00	33.00	20.00	2.00
BSEQ650W/230V/PI SEQ 650WATT PLUG-IN	100921	40.00	1.00	20.00	59.00
BSEQ650W/230V/WL SEQ 650WATT WIRE LEAD	100922b	20.00	20.00		
BSEQ700W/230V/PI SEQ 700WATT 230V PLUG-IN	100923	13.00			13.00
BSEQ800W/230V/CI SEQ 800WATT 230V CLIP-IN	100924	6.00	6.00		
			<u>240.00</u>	<u>279.00</u>	

*Sample
Report*

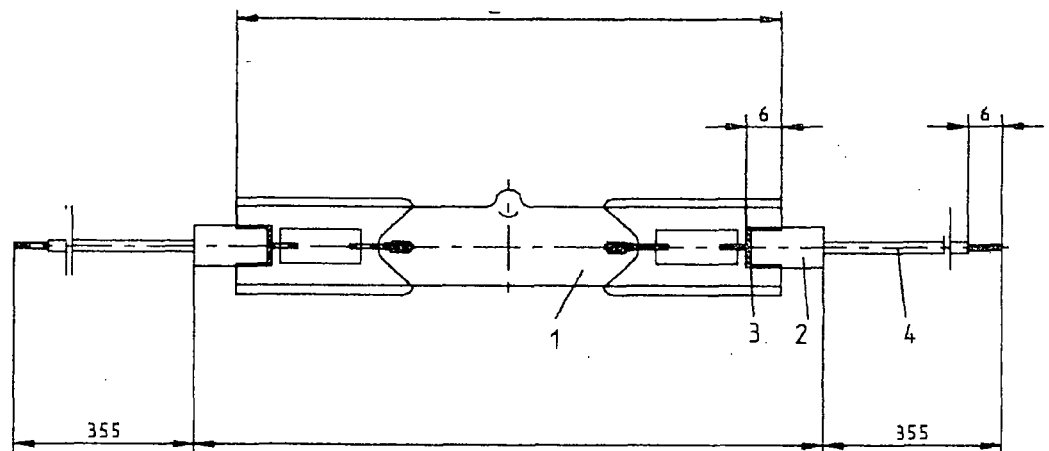
Solar Elements #100915 & #100916

Radium

The diagrams below represent a typical arc tube, quartz burner and lamp with socket. The lamp depicted is Solar Elements model #100915 (R7s sockets) or Solar Elements model #100916 (wire leads).

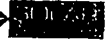


All dimensions shown in millimeters




- 1 – Filling containing Kr-85
- 2 – Ceramic socket
- 3 – Cement to glue the ceramic socket to the quartz arc pinching
- 4 – Wire lead (#100916 only)


Box label




100917
300-520W


0120351-15 CE


20 Pieces	
	
100917 300-520 W 0120351-15 Made In Germany contains Kr-85	
CE	323 17281


20 Pieces	
	
100917 300-520 W 0120351-15 Made In Germany contains Kr-85	
CE	323 17281

Case
label

20 Pieces	
	
100917 300-520 W 0120351-15 Made In Germany contains Kr-85	
CE	323 17281

20 Pieces	
	
100917 300-520 W 0120351-15 Made In Germany contains Kr-85	
CE	323 17281

20 Pieces	
	
100917 300-520 W 0120351-15 Made In Germany contains Kr-85	
CE	323 17281

20 Pieces	
	
100917 300-520 W 0120351-15 Made In Germany contains Kr-85	
CE	323 17281

USER INSTRUCTIONS FOR ULTRAVIOLET TANNING LAMPS

**Sunlamp - DANGER - Ultraviolet Radiation.
Follow Instructions**

Avoid overexposure. As with natural sunlight, overexposure can cause eye and skin injury and allergic reactions. Repeated exposure may cause premature aging of the skin and skin cancer.

WEAR PROTECTIVE EYEWEAR; FAILURE TO MAY RESULT IN SEVERE BURNS OR LONG-TERM INJURY TO THE EYES.

Medications or cosmetics may increase your sensitivity to the ultraviolet radiation. Consult physician before using sunlamp if you are using medications or have a history of skin problems or believe yourself especially sensitive to sunlight. If you do not tan in the sun, you are unlikely to tan from the use of this product."

Use ONLY in fixture equipped with a timer.

Use ONLY in fixture equipped with an appropriate protective filter.

Always follow the instructions accompanying the sunlamp equipment to minimize potential injury. Use only with products where this lamp is specified as replacement or original equipment by the sunlamp product manufacturer.

The lamp operates at an overpressure so that the possibility of an explosion cannot be entirely excluded.

The quartz bulb should be free from contaminations such as fingerprints.

Contamination may be removed with methylated spirit.

The manufacturer cannot accept any responsibility for personal injury or damage to equipment which may result from improper use of the lamp or from using improper equipment.

This product is conformity with the performance standards for sunlamp products under 21 CFR 1040.20

Imported by Superior UV Technologies (888) 526-7712

contains Kr-85



Made in Germany
10233689

Lieferschein

DE



Auslieferung: 302039210 Auftrag: 201913937

Bestelldatum: 22.03.2007

Datum: 02.04.2007 Kunde: 1014249

Bestellnr.: 640321

Lieferanschrift:

RADIUM
LAMPENWERK GMBH
DR.-E.-KERSTING-STR.6
D-51688 WIPPERFUERTH

Rechnungsanschrift:

RADIUM
LAMPENWERK GMBH
DR.-E.-KERSTING-STR.6
D-51678 WIPPERFUERTH

Die mit "AL" und gleich "N" gekennzeichneten Güter unterliegen bei der Ausfuhr aus der EU der europäischen bzw. deutschen Ausfuhrerlaubnispflicht. Die mit "ECCN" und gleich "N" gekennzeichneten Güter unterliegen der US-Resportgenehmigungspflicht. Auch ohne Kennzeichen, bzw. bei Kennzeichen "AL", "N" oder "ECCN", "N" kann sich eine Genehmigungspflicht, unter anderem durch den Endvertrieb und Verwendungszweck der Güter, ergeben. Alle unsere Lieferungen stehen unter dem Vorbehalt der Beachtung der OSRAM-Exportkontroll-Klausel. Diese kann vom Kunden eingesehen werden unter http://www.osram.de/pdf/service_comer/exportkontroll-klausel.pdf

Pos.	Menge	ME	Materialnummer Kundenartikelnnummer	Bezeichnung Gefahrguthinweise	Charge	Auftragsnummer / Pos. Bestellnummer AL-Nr. ECCN	Nettogewicht KG Bruttogewicht KG
10	646		B4680098XX12 AR+0,05MCI KR85/L			201913937 / 000010 640321 N N	1,078 14,110

Nettogew.: 1,078 KG Bruttogew.: 14,110 KG Volumen: 0,034 M3	Colli pro Sendung: 3	Spediteur: Trans-o-Flex GmbH & Co. KG Versandart: Speditionssammelgut	Gepackt durch:	Lieferbedingungen: DDU Wipperfürth	Versandstelle: 0801
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Ansprechpartner: Tel. (030) 3386 2607 Fax (030) 3386 2605 E-mail J.Philipp@osram.de
Philipp

VAT-nr. DEB11148275 WEEE-Nr. 71568000

Seite 1

Briefadresse: OSRAM GmbH Nonnendammallee 44 D-13629 BERLIN	Hausadresse: OSRAM GmbH Nonnendammallee 44 D-13629 BERLIN	OSRAM-Gesellschaft mit beschränkter Haftung München Vorsitzender des Aufsichtsrates Jürgen Radomski	Geschäftsführung: Martin Goetzeler, Vorsitzender Kurt Gerl Johannes Nägler Claus Regitz	Registergericht: München HRB 4151
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RADIOACTIVE MATERIAL
N.O.S.

UN 2915

Absender: OSRAM GmbH
Nonnendammallee 44-61
13629 Berlin

Empfänger: RADIUM GmbH
Dr.Eugen-Kersting-Str.6
51688 Wipperfürth

Lieferschein: 07003174013

Gasgemisch: 100% Ar + 0,05 mCi Kr⁸⁵ Kr

SN: B 4680098 XX 12

Fl. Inhalt: 210,- l

Fl. Nummer: 3100

Fl. Druck: 104,- bar

Brutto Gewicht: 4,35 KG

Herstelldatum: 28.3.07

This is to acknowledge the receipt of your letter/application dated

5/23/08, and to inform you that the initial processing which includes an administrative review has been performed.

☒ New License Application (03037784)
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned **Mail Control Number** 142490.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

July 16, 2008

Docket No. 030-37784
Control No. 142490

License No. 06-23969-01

Robert Klem
Member
Superior UV Technologies
17 Centerview Drive
Shelton, CT 06484

SUBJECT: SUPERIOR UV TECHNOLOGIES, REQUEST FOR ADDITIONAL
INFORMATION CONCERNING APPLICATION FOR NEW LICENSE, CONTROL
NO. 142490

Dear Mr. Klem:

This is in reference to your letter and application dated May 23, 2008 applying for a Nuclear Regulatory Commission license. In order to continue our review, we need the following additional information:

1. Confirm that you understand that, as the initial importer and distributor of devices containing radioactive materials in the United States, this company is considered by the NRC to be the initial manufacturer/distributor of the devices, and is responsible for ensuring that the imported devices meet the requirements as described in NRC regulations, license, and the Registry of Radioactive Sealed Sources and Devices Safety Evaluation of Device (SSD Registry). A description of this can be found Section 8.6 of NUREG-1556, "Consolidated Guidance About Materials Licensees", Volume 12, "Program-Specific guidance About Possession Licenses for Manufacturing and Distribution" (NUREG-1556, Vol. 12). This document can be found at the NRC's web site as described below. Specifically, you plan to distribute certain items (lamps containing krypton-85 gas) to persons who are exempt from the requirements of a license pursuant to 10 CFR 30.15. As the manufacturer, you must comply with the requirements in 10 CFR 32.14, 32.15, and 32.16 for these items, in addition to the requirements in 10 CFR Parts 19, 20 and 30.
2. Because you are an applicant for a new license, we will meet with you at your site in Shelton, Connecticut, prior to issuing the new license. An individual from our office will contact you within the next several weeks (or has contacted you) to schedule an appointment for this meeting.
3. Item 5 of the application states that the individual lamps will contain krypton-85 gas, not to exceed 0.120 microcuries per lamp, and that you do not expect to possess more than 3,000 lamps (360 microcuries krypton-85 total). Confirm if the authorized quantity on your license should be "not to exceed 0.120 microcuries per lamp and 400 microcuries total." This amount should include the total activity you expect to possess at any one time, in all devices and/or sources possessed at the Shelton, Connecticut location in

storage, use, ready for shipment, waste, etc. You may propose alternate maximum quantities to be possessed.

4. In accordance with Section 8.6 of NUREG-1556, Vol. 12, identify each device that you intend to distribute by the manufacturer name and model number. If the device must be included in the SSD registry, that information will be requested as part of the review of your request for a distribution license.
5. Item 6 of your application states that the purpose of the material to be used is "gas filling of UV tanning lamps". However, based on your letter, we understand that you do not perform gas filling but only receive finished lamps containing krypton-85. Confirm if our understanding is correct; if not, provide correct information in writing.
6. Item 7 of the application states that Robert Klem will be responsible for the radiation safety program, and that he has received some training in handling, packaging and storage of the lamp.
 - a. In accordance with Section 8.7.1 of NUREG-1556, Vol. 12, specify the individual who will be named as the Radiation Safety Officer (RSO) for the manufacturer/distributor possession license, and provide information demonstrating that the proposed RSO is qualified by training and experience to perform the duties of the RSO for the materials to be authorized by your license. If that individual is not located in Shelton, Connecticut, and/or is not a Superior UV Technologies employee:
 - (i) Describe: how control over the radiation safety program that will be delegated to the consultant-RSO; the relationship that will exist between the consultant-RSO and your institutional management for funding the radiation safety program and related regulatory requirements; the consultant-RSO's minimum amount of on-site time (hours per week/month/quarter, as applicable) performing RSO duties; and the availability of the consultant-RSO to respond to questions or operational issues that arise during the conduct of your radiation safety program and related regulatory requirements.
 - (ii) Specify the maximum amount of time it will take the RSO to arrive at the facility in the event of an emergency that requires his presence.
 - (iii) Appoint an in-house representative who will serve as the point of contact during the RSO's absence. This person may be allowed to assist the consultant-RSO with limited authority.
 - b. In accordance with Section 8.7.2, name all other persons who will be authorized to handle, or supervise the handling of, licensed materials and will be listed on the license. Provide information for each individual that demonstrates that he/she is qualified by training and experience to possess and use the licensed material.
7. In accordance with Section 8.8 of NUREG-1556, Vol. 12, describe the radiation safety training that will be provided to Robert Klem and any other individuals who will handle the

lamps containing krypton-85 at your facility. Although the risks from the sources are low, individuals who are present in the area and/or handle the license materials should know such information as: how to recognize the sources/devices containing radioactive materials; limitations for activities with the sources/devices (can they remove sources from the device?); regulatory requirements for transfers, posting, labeling, disposal, Department of Transportation (DOT) shipping requirements etc; and any other appropriate topics. Confirm that any ancillary personnel working in areas such as shipping/receiving, maintenance, etcetera will be appropriately instructed in recognizing and handling the devices, and their limitations for working with or around the devices.

8. Item 10 of your application states that you do not have a formal radiation safety program. However, a minimal radiation safety program is required, commensurate with your actual activities in Shelton, Connecticut. In addition, as the initial manufacturer/importer, you are responsible to ensure that the lamps you import meet the design requirements specified in the SSD Registry.
- a. In accordance with Section 8.10.1 of NUREG-1556, Vol. 12, describe your audit program for ensuring radiation safety and compliance with NRC regulations and requirements.
 - b. In accordance with Section 8.10.2 of NUREG-1556, Vol. 12, describe the monitoring instruments that you have (or would have access to) for routine and/or emergency monitoring of radiation or radioactive contamination.
 - c. In accordance with Section 8.10.3 of NUREG-1556, Vol. 12, provide your procedures for ensuring material accountability; OR state "Physical inventories will be conducted at intervals not to exceed 6 months, to account for all sealed sources or devices received or possessed under the license;" OR provide an alternate procedure for ensuring that devices have not been lost, stolen, or misplaced. Please note that 10 CFR 32.17 requires that an annual report of transfers be submitted to the NRC, and specifies the information that must be included in the report.
 - d. In accordance with Section 8.10.3 of NUREG-1556, Vol. 12, you do not have to submit procedures for package receipt and safe package opening and handling. Please note, however, that you are required to have such procedures and they will be reviewed during inspection.
 - e. In accordance with Section 8.10.4 of NUREG-1556, Vol. 12, describe how you will assess (or have assessed) occupational dose from your activities.
 - f. In accordance with Section 8.10.6 of NUREG-1556, Vol. 12, confirm that you will develop, document, implement, and maintain operating procedures and emergency procedures, commensurate with the radiation safety requirements for your licensed materials.
 - g. In accordance with Section 8.10.1 of NUREG-1556, Vol. 12, describe the radiation surveys you will perform, commensurate with the radiation safety

requirements for your licensed materials. We understand that leak tests are not required for sealed sources of krypton-85.

9. Confirm that you will transport, or offer for transport, licensed devices in accordance with the requirements of the Department of Transportation (DOT). Please note that that DOT regulations require that all persons who will prepare packages for transportation be trained in the applicable requirements at 3-year intervals (49 CFR 172.704).
10. Item 11 states that inoperable lamps returned to you by customers are shipped back to the original manufacturer in Germany. However, if damaged devices are received by Superior UV Technologies or an event such as a building fire occurs, the sources in the devices may be considered radioactive waste. Radioactive waste may not be exported, in accordance with 10 CFR 110.23(a)(1). Confirm that if any of the sources or devices become radioactive waste, that such radioactive waste will be transferred to an authorized radioactive waste broker for appropriate disposal.

We understand that you have applied for a license for distribution of the devices to persons exempted from licensing, pursuant to 10 CFR 30.15. Review of that application will include review of the labeling of the devices and instructions to users of the lamps.

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

We will continue our review upon receipt of this information. Please reply to my attention at the Region I Office and refer to Mail Control No. 142490. If you have any technical questions regarding this deficiency letter, please call me at (610) 337-5040.

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.

Sincerely,

Original signed by Elizabeth Ullrich

Betsy Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

DOCUMENT NAME: G:\WordDocs\Current\Lic Def Letter\L06-23969-01.142490.doc

SUNSI Review Complete: EUllrich

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NAME	EUllrich/EU					
DATE	7/16/2008					

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406-1415

August 6, 2008

Docket No. 030-37784
Control No. 142490

License No. 06-23969-01

Robert Klem
Member
Superior UV Technologies
(Solar Elements)
17 Centerview Drive
Shelton, CT 06484

SUBJECT: SUPERIOR UV TECHNOLOGIES, NEW LICENSE, CONTROL NO. 142490

Dear Mr. Klem:

This refers to your request for an NRC license. Enclosed with this letter is the license. Please review the enclosed document carefully and be sure that you understand all conditions. If there are any errors or questions, please notify the U.S. Nuclear Regulatory Commission, Region I Office, Licensing Assistance Team, (610) 337-5239, so that we can provide appropriate corrections and answers.

When submitting future license amendments, please have the document signed by a management representative rather than the Radiation Safety Officer. The NRC views a letter signed by a management representative as an indication that management has reviewed the application and concurs in the statements and representations contained therein. In addition, please note that NRC Form 313 requires the applicant, by signature, to verify that the applicant understands that all statements contained in the application are true and correct to the best of the applicant's knowledge. The signatory for the application should be the licensee or a certifying official of the licensee rather than a consultant.

The NRC is required to have your Taxpayer Identification Number in order to make payments (refunds). The self-addressed, stamped NRC Form 531, "Request for Taxpayer Identification Number," is enclosed.

The NRC expects licensees to conduct their programs with meticulous attention to detail and high standards of safety and compliance. Because of the serious consequences to employees and the public that can result from failure to comply with NRC requirements, you must conduct your program according to NRC regulations, the conditions of your NRC license, and the representations made in your application. In particular, note that you must:

1. Operate in accordance with NRC regulations 10 CFR Part 19, "Notices, Instructions and Reports to Workers; Inspections," 10 CFR Part 20, "Standards for Protection Against Radiation," and other applicable regulations.
2. Notify the NRC in writing of any change in mailing address.

3. In accordance with 10 CFR 30.36(d), notify the NRC, promptly, in writing, and request termination of the license
 - a) when you decide to terminate all activities involving materials authorized under the license; or
 - b) if you decide not to acquire or possess and use authorized material.
4. Request and obtain a license amendment before you:
 - a) change Radiation Safety Officers;
 - b) order byproduct material in excess of the amount, or radionuclide, or form different than authorized on the license;
 - c) add or change the areas of use, or addresses of use identified in the license application or on the license; or
 - d) change the name or ownership of your organization.
5. Submit a complete renewal application or termination request at least 30 days before the expiration date of your license. You will receive a reminder notice approximately 90 days before the expiration date. Possession of byproduct material after your license expires is a violation of NRC regulations.

You will be periodically inspected by the NRC. Failure to conduct your program safely and in accordance with NRC regulations, license conditions, and the representations made in your license application and supplemental correspondence with NRC will result in enforcement action against you. This could include issuance of a notice of violation, imposition of a civil penalty, or an order suspending, modifying or revoking your license.

An environmental assessment for this action is not required, since this action is categorically excluded under 10 CFR 51.22(c)(14).

Current NRC regulations and guidance are included on the NRC's website at www.nrc.gov; select **Nuclear Materials; Medical, Academic, and Industrial Uses of Nuclear Material**; then **Regulations, Guidance, and Communications**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-888-293-6498. The GPO is open from 7:00 a.m. to 8:00 p.m. EST, Monday through Friday (except Federal holidays).

Thank you for your cooperation.

R. Klem

3

Sincerely,

Original signed by Elizabeth Ullrich

Betsy Ullrich
Senior Health Physicist
Commercial and R&D Branch
Division of Nuclear Materials Safety

Enclosures

1. NRC Form 531
2. License No. 06-23969-01

R. Klem

4

DOCUMENT NAME: G:\WordDocs\Current\Lic Cvr Letter\L06-23969-01.142490.doc

SUNSI Review Complete: EUllrich

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NAME	EUllrich/EU					
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U.S. NUCLEAR REGULATORY COMMISSION

MATERIALS LICENSE

Pursuant to the Atomic Energy Act of 1954, as amended, the Energy Reorganization Act of 1974 (Public Law 93-438), and Title 10, Code of Federal Regulations, Chapter I, Parts 30, 31, 32, 33, 34, 35, 36, 39, 40, and 70, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, acquire, possess, and transfer byproduct, source, and special nuclear material designated below; to use such material for the purpose(s) and at the place(s) designated below; to deliver or transfer such material to persons authorized to receive it in accordance with the regulations of the applicable Part(s). This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and is subject to all applicable rules, regulations, and orders of the Nuclear Regulatory Commission now or hereafter in effect and to any conditions specified below.

Licensee		
1. Superior UV Technologies (Solar Elements)	3. License number 06-23969-01	
2. 17 Centerview Drive Shelton, Connecticut 06484	4. Expiration date August 31, 2018	
	5. Docket No. 030-37784 Reference No.	
6. Byproduct, source, and/or special nuclear material	7. Chemical and/or physical form	8. Maximum amount that licensee may possess at any one time under this license
A. Krypton 85	A. Gas in quartz arc tubes	A. 0.120 microcuries per source and 400 microcuries total
9. Authorized use:		
A. Possession and storage in Radium Lampenwerk GmbH ultraviolet lamps prior to initial distribution.		

CONDITIONS

10. Licensed material may be used or stored only at the licensee's facilities located at 17 Centerview Drive, Shelton, Connecticut.
11. Licensed material shall be used by, or under the supervision of, Robert Klem.
12. The Radiation Safety Officer for this license is Robert Klem.
13. The licensee shall not use licensed material in or on human beings.
14. The licensee shall not use licensed material in field applications where it is released except as provided otherwise by specific condition of this license.
15. This license does not authorize commercial distribution of licensed material to persons generally licensed pursuant to 10 CFR Part 31 or to persons exempt from licensing pursuant to 10 CFR 30.14 through 30.21, inclusive, or equivalent regulations of any Agreement State.

**MATERIALS LICENSE
SUPPLEMENTARY SHEET**License Number
06-23969-01Docket or Reference Number
030-37784

16. The licensee shall conduct a physical inventory every six months, or at other intervals approved by the U.S. Nuclear Regulatory Commission, to account for all sources and/or devices received and possessed under the license. Records of inventories shall be maintained for 5 years from the date of each inventory and shall include the radionuclides, quantities, manufacturer's name and model numbers, and the date of the inventory.
17. The licensee is authorized to transport licensed material in accordance with the provisions of 10 CFR Part 71, "Packaging and Transportation of Radioactive Material."
18. Except as specifically provided otherwise in this license, the licensee shall conduct its program in accordance with the statements, representations, and procedures contained in the documents, including any enclosures, listed below. The U.S. Nuclear Regulatory Commission's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
- A. Letter dated May 23, 2008 [ML081840550]
B. Letter dated July 24, 2008 [ML082170310]

For the U.S. Nuclear Regulatory Commission

Date August 6, 2008By *Original signed by Elizabeth Ullrich*Elizabeth Ullrich
Commercial and R&D Branch
Division of Nuclear Materials Safety
Region I
King of Prussia, Pennsylvania 19406

Supra Technologies

NRC
License
Documents

03037553



SUPRA[®]
TECHNOLOGIES

**986 Salvador Avenue
Napa, CA 94558**

Solar Planet Inc., a California Corporation

September 24, 2007

Mr. Anthony Kirkwood, Health Physicist
Nuclear Materials Licensing Section
US Nuclear Regulatory Commission, Region IV
Mailstop T - 8F3
Washington D.C. 20555-0001

Regarding: Solar Planet Inc., dba Supra Technologies, CA License # 7669-28
Osram/Sylvania NRC license number 20-30024-02E

Dear Mr. Kirkwood,

As we have now obtained the possession license for the state of California we ask that you review our application for a national license to distribute our products.

We are a small company, representing Radium Lampenwerk Wipperfurth, Germany, an Osram/Sylvania subsidiary, documentation of which has been enclosed with this document.

Also enclosed is a copy of the California Radioactive Material License, dated September 22, 2007.

These UV lamps are imported by us for further use in UV sun tanning equipment, and all products are listed with the FDA. We have enclosed a document that lists both the factory's and our FDA Registration numbers with the FDA, which also shows all products FDA accession number by type of model.

We do not alter, modify nor repackage any of the products during importation nor before delivery to our customers. In addition, our products are sold at whole sale prices to major customers in the USA. We have only one warehouse, located in Napa CA. I have also enclosed a copy of our brochure, on the back of which is a summary of my personal back ground, What We Do, in the field of UV light, designs and over all industry experience since 1978.

022630

Since we are a very small company, with fiscal 2007 sales year to date of less than \$800,000, we ask that you consider the predicament we are in with regards to the high license fees. I have enclosed a check in the amount of \$10,500 as requested by Brenda Brown today.

Further, we are expected to attend a tradeshow on October 10, 2007, which we have already paid for in full and our distributors expect to use our trade show booth at that date. We would very much appreciate if at all possible our application could be reviewed and hopefully pass for licensing as soon as possible.

Very sincerely yours,

A handwritten signature in black ink, appearing to read "Leif Vasstrom". The signature is fluid and cursive, with a large, sweeping "L" and a long, trailing "m".

Leif Vasstrom
Principal
Solar Planet Inc., dba Supra Technologies

c.c. Linda Gersey, NRC Region IV

Enclosures: Application For Material License
 Payments by check
 Ca Materials License
 Radium & Osram/Sylvania documentation
 FDA Passport
 Supra Brochure

NRC FORM 313 (5-1997) 10 CFR 30, 32, 33 34, 35, 36, 39 and 40		U. S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3180-0120		EXPIRES: 7/31/1999	
APPLICATION FOR MATERIAL LICENSE							
INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.							
APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH: DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY 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: CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO: LICENSING ASSISTANT SECTION NUCLEAR MATERIALS SAFETY BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION I 475 ALLENDALE ROAD KING OF PRUSSIA, PA 19406-1415 ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO: ATLANTA FEDERAL CENTER U. S. NUCLEAR REGULATORY COMMISSION, REGION II 61 FORSYTH STREET, S.W., SUITE 2378 ATLANTA, GEORGIA 30303-3415				IF YOU ARE LOCATED IN: ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO: MATERIALS LICENSING SECTION U.S. NUCLEAR REGULATORY COMMISSION, REGION III 801 WARRENVILLE RD. LISLE, IL 60532-4351 ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA, 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 SECTION U.S. NUCLEAR REGULATORY COMMISSION, REGION IV 811 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TX 76011-8084			
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) <input checked="" type="checkbox"/> A. NEW LICENSE <input type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER _____ <input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER _____				2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip code) SOLAR PLANET INC, c/o SUPRA TECHNOLOGIES 986 SALVADOR AVE. NAPA, CA 94558			
3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED 1125 Golden Gate Drive UNIT 5105, NAPA, CA 94558				4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION LEIF VASSTROM TELEPHONE NUMBER 415 785 6666			
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.			
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9. FACILITIES AND EQUIPMENT.				10. RADIATION SAFETY PROGRAM.			
11. WASTE MANAGEMENT.				12. LICENSEE FEES (See 10 CFR 170 and Section 170.31) FEE CATEGORY 31 AMOUNT ENCLOSED \$10,500.00			
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, 38 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 WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.							
CERTIFYING OFFICER - TYPE/PRINTED NAME AND TITLE LEIF VASSTROM				SIGNATURE 		DATE 9/24-07	
FOR NRC USE ONLY							
TYPE OF FEE		FEE LOG		FEE CATEGORY		AMOUNT RECEIVED	
						\$	
APPROVED BY				CHECK NUMBER		COMMENTS	
DATE							

NRC FORM 313 (5-1997)

PRINTED ON RECYCLED PAPER



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TECHNOLOGIES

986 Salvador Avenue
Napa, CA 94558

Solar Planet Inc., a California Corporation

September 24, 2007

Attachment to Application for Material License

Section 5.

As per enclosed California State License:

Nuclide: KR - 85

Form: In sealed sources

Possession Limit: 10,000 lamps not to exceed 120 nanocuries each
Total not to exceed 1.2 millicuries

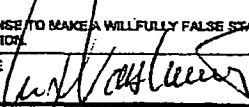
Section 6.

Sales and distribution of UV - Lamps

Lamps are made by Radium Lampenwerk, an Osram/Sylvania subsidiary.

Leif Vasstrom
Principal

Solar Planet Inc., dba Supra Technologies

NRC FORM 313 (5-1987) 10 CFR 32, 33, 34, 35, 36, 39 and 40		U. S. NUCLEAR REGULATORY COMMISSION		APPROVED BY OMB: NO. 3150-0120 Expires: 7/31/1995	
APPLICATION FOR MATERIAL LICENSE				Estimated burden per response to comply with this information collection request: 7 hours. Submission of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Forward comments regarding burden estimates to the Information and Records Management Branch (1-8 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0120), Office of Management and Budget, Washington, DC 20503. NRC may not conduct or sponsor, and a person is not required to respond to, an information collection unless it displays a currently valid OMB control number.	
INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.					
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FOR NRC USE ONLY					
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APPROVED BY			\$	DATE	

NRC FORM 313 (5-1987)

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986 Salvador Avenue
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September 24, 2007

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Section 6.

Sales and distribution of UV - Lamps

Lamps are made by Radium Lampenwerk, an Osram/Sylvania subsidiary.

Leif Vasstrom

Principal

Solar Planet Inc., dba Supra Technologies

RADIOACTIVE MATERIAL LICENSE

Pursuant to the California Code of Regulations, Division 1, Title 17, Chapter 5, Subchapter 4, Group 2, Licensing of Radioactive Material, and in reliance on statements and representations heretofore made by the licensee, a license is hereby issued authorizing the licensee to receive, use, possess, transfer, or dispose of radioactive material listed below; and to use such radioactive material for the purpose(s) and at the places(s) designated below. This license is subject to all applicable rules, regulations, and orders of the California Department of Public Health now or hereafter in effect and to any standard or specific condition specified in this license.

1. Licensee	Solar Planet Inc, dba Supra Technologies	3. License Number	7669-28	Amendment Number :
2. Address	986 Salvador Avenue Napa, CA 94558	4. Expiration date	September 22, 2017	(5)
Attention:	Leif Vasstrom Radiation Safety Officer	5. Inspection agency	Radiologic Health Branch North	

6. Nuclide	7. Form	8. Possession Limit
A. Krypton-85	A. Sealed sources (Osram/Sylvania lamps)	A. 10000 lamps not to exceed 120 nanocuries each. Total not to exceed 1.2 millicuries.

9. Authorized Use

- A. Possession as exempt items received pursuant to NRC license 20-30024-02E.

LICENSE CONDITIONS

10. Radioactive material shall be stored only at the following location:
(a) 1125 Golden Gate Drive, Unit 5105, Napa, CA
11. This license is subject to an annual fee for sources of radioactive material authorized to be possessed at any one time as specified in Items 6, 7, 8 and 9 of this license. The annual fee for this license is required by and computed in accordance with Title 17, California Code of Regulations, Sections 30230-30232 and is also subject to an annual cost-of-living adjustment pursuant to Section 100425 of the California Health and Safety Code.
12. Radioactive material shall be used by, or under the supervision of, the following individuals:
(a) Leif Vasstrom
13. Except as specifically provided otherwise by this license, the licensee shall possess and use radioactive material described in Items 6, 7, 8 and 9 of this license in accordance with the statements, representations, and procedures contained in the documents listed below. The Department's regulations shall govern unless the statements, representations, and procedures in the licensee's application and correspondence are more restrictive than the regulations.
(a) The application dated September 10, 2007 signed by Lief Vasstrom, Radiation Safety Officer, with attachments thereto, as modified by the letters with attachments, dated September 11, 2007, all signed by Lief Vasstrom.
14. The Radiation Safety Officer in this program shall be Lief Vasstrom.

RADIOACTIVE MATERIAL LICENSE

License Number: 7669-28

Amendment Number:

15. The licensee will provide the Low Level Radioactive Waste (LLRW) reports specified in the California Health and Safety Code section 115000.1(h) to the California Department of Public Health (CDPH) on an annual basis for both shipped and stored LLRW. Alternatively, LLRW shipment information may be provided on a per shipment basis. LLRW shipment information and annual reports shall be mailed to:

Attn: LLRW Tracking Program
California Department of Public Health
Radiologic Health Branch, MS 7610
P.O. Box 997414
Sacramento, CA 95899-7414

Issued for the California Department of Public Health

Date: September 22, 2007

By: John G. Fassell

John G. Fassell, CHP
Radiologic Health Branch, MS 7610
P.O. Box 997414
Sacramento, CA 95899-7414

Supra Technologies FDA Passport

Supra Details:	
FDA Owner/Operator #: 9082001	Registration #: 3005569195
US Customs Harmonized Commodity #: 8539490040	Conforms to 21 CFR 1040.20
Manufacturer's Details:	
FDA Medical Device Listing Code:	Registration #: 8010832
	LEJ Document: B062183
Note: Green fields to be noted on commercial invoices for importation to the U.S.	

Accession #s	Doc. Date	Document	Brand & Description
8720182-10	11/28/2005	Add. new brand name	SUPRA Q-04500SI 400-500W 230V
8720182-11	11/28/2005	Add. new brand name	SUPRA Q-04500WL 400-500W 230V
8720182-13	11/27/2006	Add. new brand name	Radiance R-04500SI 400-500W 230V
8720182-14	11/27/2006	Add. new brand name	Radiance R-04500WL 400-500W 230V
9221133-05	12/28/2005	Add. new brand name	SUPRA Q-2400WL4 2000-2400W 400V
9221133-06	11/27/2006	Add. new brand name	Radiance R-2400WL4 2000-2400W 400V
8621761-18	2/5/2006	Add. new brand name	SUPRA Q-2400LWL4 2000-2400W 400V
9221134-11	11/21/2005	Add. new brand name	SUPRA Q-01530R 1450-1530W 230V
9221134-12	11/21/2005	Add. new brand name	SUPRA Q-0151 OBL 1450-1510W 230V
9221134-13	11/21/2005	Add. new brand name	SUPRA Q-01400WL 1000-1400W 230V
9221134-14	11/21/2005	Add. new brand name	SUPRA Q-01400LWL 1000-1400W 230V
9221134-15	11/21/2005	Add. new brand name	SUPRA Q-08100WL 800-1000W 230V
9221134-16	11/27/2006	Add. new brand name	Radiance R-01400WL 1000-1400W 230V
9221134-17	11/27/2006	Add. new brand name	Radiance R-0151 OBL 1450-1510W 230V
9221134-18	11/27/2006	Add. new brand name	Radiance R-01530R 1450-1530W 230V
0220025-03	12/2/2005	Add. new brand name	SUPRA Q-0600PIGY 600W 230V
0220025-04	12/2/2005	Add. new brand name	SUPRA Q-0600PIGH 600W 230V
9920907-04	11/28/2005	Add. new brand name	SUPRA Q-06630R 630W 230V
9920907-05	11/28/2005	Add. new brand name	SUPRA Q-06620BL 620W 230V
9920907-06	11/28/2005	Add. new brand name	SUPRA Q-0610LWL 610W 230V
9920907-07	11/28/2005	Add. new brand name	SUPRA Q-0600WL 600W 230V
9920907-09	11/27/2006	Add. new brand name	Radiance R-06620BL 620W 230V
9920907-10	11/27/2006	Add. new brand name	Radiance R-06630R 630W 230V
0520864-01	11/21/2005	Add. new brand name	SUPRA Q-1400WL4 1000-1400W 400V
0520864-02	11/27/2006	Add. new brand name	Radiance R-01400WL4 1000-1400W 400V
9221134-19	11/10/2006	Add. new brand name	SunX2 1000W 400V
0120351-07	12/2/2005	Add. new brand name	SUPRA Q-03520PIJK 300-520W 230V
0120351-11	11/27/2006	Add. new brand name	Radiance R-03520PIJK 300-520W 230V
0120351-08	12/2/2005	Add. new brand name	SUPRA Q-08100PIX 800-1000W 230V
0120351-09	12/2/2005	Add. new brand name	SUPRA Q-08100PIGY 800-1000W 230V
0120351-10	12/2/2005	Add. new brand name	SUPRA Q-08100PIGH 800-1000W 230V
0120351-12	11/27/2006	Add. new brand name	Radiance R-08100PIGY 800-1000W 230V
0120351-14	9/17/2006	Add. new brand name	SunX2 1000W PIGY 230V

Supra Technologies FED Tax ID # is 943221541

Radium

Lampenwerk Wipperfurth

Radium Lampenwerk GmbH · Postfach 1440 · 51678 Wipperfurth

To whom this may concern

Ihr Zeichen/Nachricht vom

Unser Zeichen/Name

Telefon-Durchwahl
(0 22 67) 81

Telefax
(0 22 67) 81

Datum
August 22nd 2007

Reference: Company relationship of RADIUM and OSRAM SYLVANIA

To whom it may concern,

this letter confirms that

RADIUM Lampenwerk GmbH, located Dr. Eugen-Kersting-Straße 6 in 51688 Wipperfurth, Germany

is a full daughter company of

OSRAM GmbH, located Hellabrunner Straße 1 in 81536 Munich, Germany.

OSRAM GmbH is represented in the United States of America by

OSRAM SYLVANIA, located 100 Endicott Street in Danvers, MA 01923 USA.

Sincerely,

RADIUM Lampenwerk GmbH



Andreas Steinert
- Director -



Markus Schwarz
- Key Account Manager Tanning Lamps -

RADIUM LAMPENWERK GMBH
DR.-EUGEN-KERSTING-STR. 6
51688 WIPPERFÜRT
GERMANY

APPLICATION FOR RADIO-
ACTIVE LICENSE
DATE: 09.10.07

ARC TUBE TECHNICAL DATA

MANUFACTURER: Radium Lampenwerk GmbH, Wipperfuerth, Germany
CONSTRUCTION: Quartz
CONTAINMENT: Sealed quartz bulb
CHEMICAL FORM: Krypton/Argon mixture
RADIOACTIVE CONTENT: Krypton-85

MAXIMUM ACTIVITY PER LAMP: 4.440,00 Bq

PROTOTYPE TESTS:

Prototype testing to demonstrate that byproduct material is not released to the environment under the most severe conditions of normal use is not necessary because in the unlikely event of the breakage of the lamp the resultant release of the very small quantity Krypton-85 would quickly dissipate.

QUALITY CONTROL:

After manufacture, all quartz lamps are tested for electrical function. A quartz lamp failing this test is considered a possible leaker and discarded. Each tank of the Argon-Krypton-85 mixture received from Osram, Berlin, Germany, comes with a certification as to the Krypton-85 concentration. The quantity of Krypton-85 in a lamp is a function of the volume of the lamp and the specific activity of the gas. These parameters are set at Osram GmbH, Berlin, Germany, and are strictly monitored during production. Krypton-85 is the only radioactive gas used at the production facility, eliminating the possible use of any other radioactive material.

RADIOACTIVE MATERIAL:

- Krypton-85
Physical Form: gas
Maximum Activity Per Item: 120 nanocuries (4.440 kilobecquerels)

PURPOSE FOR WHICH THE LICENSED MATERIAL WILL BE USED:

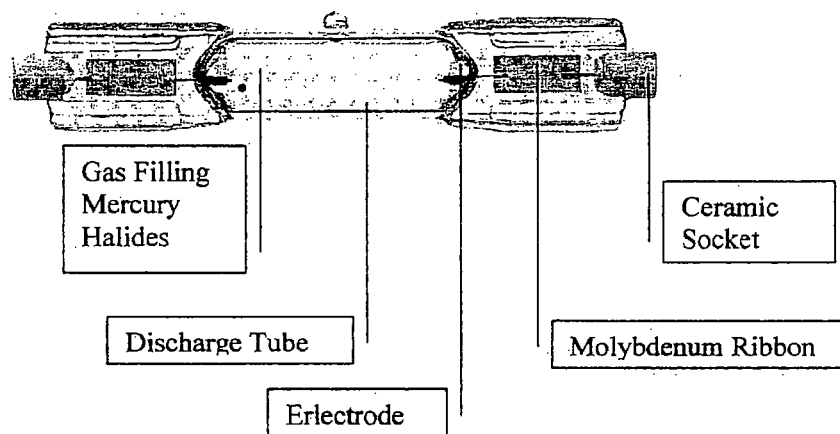
- Krypton-85

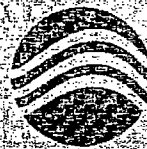
As a constituent of the fill gas an (HID) UV lamp.

The following are the imported UV lamp-types which contain Krypton-85 gas:

- | | |
|----------------------------------|------------------------------------|
| 1. Q-01000PIGY 800-1000 230V PI | 18. Q-1400LWL 1000-1400 230V LWL |
| 2. Q-01510BL 1450-1510 230V BL | 19. Q-1400WL 1000-1400 230V WL |
| 3. Q-01530R 1450-1510 230V R | 20. Q-1400WL4 1000-1400 400V WL |
| 4. Q-08100WL 800-1000 230V WL | 21. RAD-01400WL 1000W 230V WL |
| 5. Q-03520PIJK 300-520 230V PI | 22. RAD-01400WL4 1000W 380V WL |
| 6. Q-04500SI 400-500 230V SI | 23. RAD-01510BL 1510W 230V BL |
| 7. Q-04500WL 400-500 230V WL | 24. RAD-01530R 1530W 230V R |
| 8. Q-0600PIGH 600 230V PI | 25. RAD-08100PIGY 1000W 230V PI |
| 9. Q-0600PIGY 600 230V PI | 26. RAD-03520PIJK 400-500W 230V PI |
| 10. Q-0600WL 600 230V WL | 27. RAD-04500SI 400-500W 230V SI |
| 11. Q-0610LWL 600 230V LWL | 28. RAD-04500WL 400-500W 230V WL |
| 12. Q-06620BL 610 230V BL | 29. RAD-06620BL 610W 230V BL |
| 13. Q-06630R 630 230V R | 30. RAD-06630R 630W 230V R |
| 14. Q-0800SI 800W 230V SI | 31. SunX2 1000W 230V GY9,5 PI |
| 15. Q-08100PIGH 800-1000 230V PI | 32. Sunx2 1250W 400V AWL |
| 16. Q-08100PIGY 800-1000 230V PI | |
| 17. Q-08100PIX 800-1000 230V PI | |

TYPICAL PRODUCT PICTURE:





SUPRA
TECHNOLOGIES



The Supra® Collection
Super Premium Quartz Lamps
from Germany. Guaranteed to
outperform other lamps and
comes with a warranty.

Ask us about the Sunshine Vitamine®

QUARTZ LAMP PERFORMANCE

The Supra® Guarantee:
Better Performance & Longer Life
than any other Lamp. We dare to
compare. Get the edge today and
save Money and Time. Ask us how.

To ensure maximum performance, reliability
and longevity, both ambient and operational
issues have been researched, understood
and then designed into all product segments.
Premium salons bank on our Legendary
Performance and Long Life.

Largest Selection of Premium Quartz.

Go to our Web-Site www.supratechnologies.com
Select the Right Lamp from 21 Different Models



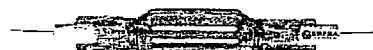
Supra® 300-520w



Supra® 800-1000w

Select from our 21 lamps by:

- + Lamp Specification
- + Tanning Unit Model
- + Cross Reference



Supra® 1000-1400w 380v



Our authorized distributors have thousands of lamps in stock for any tanning system.

Call yours today for immediate delivery.

Ask for references — Quality and Performance — Guaranteed.



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www.supratechnologies.com

Lamps > Quartz Lamps

The Supra® Collection

Super-Premium Quartz Lamps from Germany. Guaranteed to outperform others and comes with a 400 hour warranty.

Order

Understanding Lamps

Our Factory

Lamp Specifications

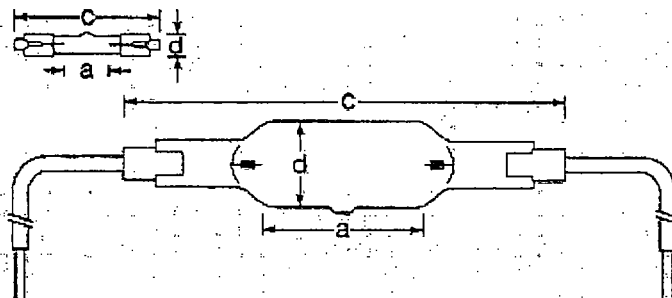
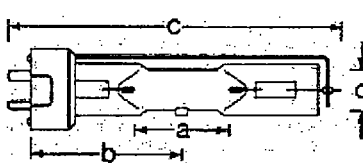
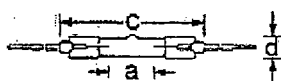
Please move the mouse pointer over the model numbers below for additional product information or click on the model number to see an image of the product.

Brand	Model #	Watts	Volts	Contact Base*	Figure	Dimensions* in mm				Effective Life* Hrs
Supra®	Q-03520PIJK	300-520	230	PI-GY9.5	3	33	53	110	14	800
Supra®	Q-04500SI	400-500	230	SI-R7s	2	33		110	14	800
Supra®	Q-04500WL	400-500	230	WL	1	33		110	14	800
Supra®	Q-0600PIGY	600	230	PI-GY9.5	3	32	53	110	16	800
Supra®	Q-0600PIGH	600	230	PI-GYH9.5	3	32	53	112	16	800
Supra®	Q-0600WL	600	230	WL	4	45		144	16	800
Supra®	Q-0610LWL	610	230	WL-K10s	4	45		160	16	800
Supra®	Q-06620BL	620	230	BL-MeSo	n/a	45		129	16	800
Supra®	Q-06630R	630	230	R-MeSt	n/a	45		120	16	800
Supra®	Q-08100PIGY	800-1000	230	PI-GY9.5	3	29	55	115	23	800
Supra®	Q-08100PIGH	800-1000	230	PI-GYH9.5	3	29	57	119	23	800
Supra®	Q-08100PIX	800-1000	230	PI-GYX9.5	3	29	74	140	23	800
Supra®	Q-08100WL	800-1000	230	WL	4	48		138	28	600
Supra®	Q-01400WL	1000-1400	230	WL	4	48		138	28	600
Supra®	Q-1400LWL	1000-1400	230	WL-K10s	4	48		168	28	600
Supra®	Q-1400WL4	1000-1400	400	WL	4	52		138	28	600
Supra®	Q-01510BL	1450-1510	230	BL-MeSo	n/a	48		135	28	600
Supra®	Q-01530R	1450-1530	230	R-MeSt	n/a	48		128	28	600
Supra®	Q-2400WL4	2000-2400	400	WL	4	72		174	28	600
Supra®	Q-2400LWL4	2000-2400	400	WL	4	104		210	28	600
Supra®	Q-0800SI	800	230	SI-R7s	2	35		116	18	800

* Contact Base: SI - Snap-In, WL - Wire-Lead, PI - Single Contact Bi-Pin, BL - Blade, R - Round Pin.

* Dimensions: a) Distance btw Electrodes, b) Insertion Depth of PI, c) Total Lamp Length excl. WL, d) Lamp Diameter

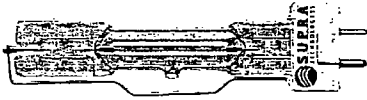
* Effective Life of a Supra® lamp is calculated based on a minimum of 80% performance from start up.



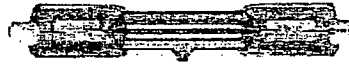
All lamps manufactured in Germany. Retail prices include a 400 hour warranty. Additional Types and Individual Lamp Specifications are available on request. The box quantity is 25 for all lamps. All lamps can be operated in any position.

1-800-959-1255

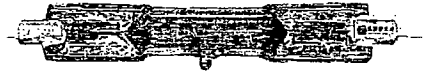
The Supra® Collection



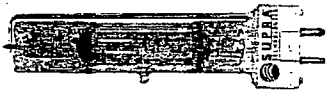
MODEL # Q-03520PIJK



MODEL # Q-04500SI



MODEL # Q-04500WL



MODEL # Q-0600PIGY



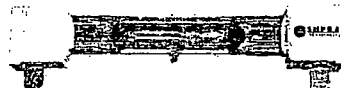
MODEL # Q-0600PIGH



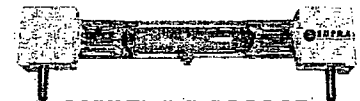
MODEL # Q-0600WL



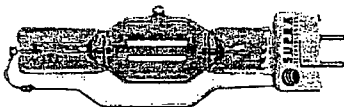
MODEL # Q-0610LWL



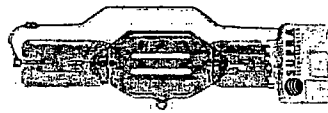
MODEL # Q-06620BL



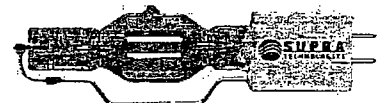
MODEL # Q-06630R



MODEL # Q-08100PIGY



MODEL # Q-08100PIGH



MODEL # Q-08100PIX



MODEL # Q-08100WL



MODEL # Q-01400WL



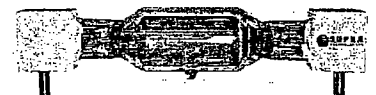
MODEL # Q-1400LWL



MODEL # Q-1400WL4



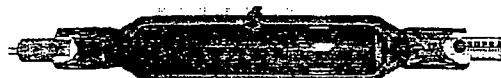
MODEL # Q-01510BL



MODEL # Q-01530 R



MODEL # Q-2400WL4



MODEL # Q-2400LWL4



MODEL # Q-0800SI

Supra® — A Commitment for Excellence Through Performance.



What We Do

For **30 years** our team has been in a constant pursuit of ever faster, better performing and more efficient tanning lamps and equipment. Through this quest, it is undeniable that we have earned the right to lead the way. Thousands of salon owners are now financially successful and have built stable businesses in their communities. We remain true to **our commitment for excellence through performance.**

Team Milestones

Founded **Silver Group Inc.** (1978) and **QDM Co., Inc.** (1993) and launched the **Silver Solarium** and **Dr. Müller** lines of Very High Performance Tanning Equipment. Designed the tanning industry's highest performing product line - the VHP System. This System set the standard for the tanning industry and enabled salon owners to increase profits by offering faster tans. Commonality: Considerably higher per square foot income than other salons.

High Pressure & Low Pressure Lamps

The Supra® Collection - new Super Premium Quartz Lamps - is launched in 2004. This continues to build on past experience with new and exciting developments for better even more reliable lamps. 80' & 90's - Designed the brand Original Dr. Müller US lamp line (VHP) - for years the most recognized name in quartz lamps.

The Sunshine Vitamine® - premium fluorescent lamps along with an exclusive marketing concept is ready for launch in 2006. 90's - Launched the VHP R, L and O fluorescent replacement lamp line. Look for **Filtered Sunlight®.**

Software

Designed the Breeze Salon Software and business management program in 1985. Breeze is acquired by SunLync in 2003.

Timers & Control Systems

Designed the first computerized tanning equipment front desk control unit in 1985. Instrumental in starting Applied Digital in the manufacturing of computerized tanning salon controls in 1986. The **T-Max System** is today the industry standard.

Business Management Tools

Retail operation & training manuals, proven salon business models and marketing campaigns. Extensive experience and industry know-how as a leader in retail operations. Authors of **"How to gross \$500,000 in as little as 1000sq.ft."**

Business Plans

An inter-active Capital Investment Business Plan, with detailed Profit & Loss Statement, Balance Sheet, ROI & Payback Analysis. This tool can allow for a powerful financial edge to help realize market dominance. Also included are start-up costs, income, maintenance and staffing schedules. This is the industry's most complete program and it is available on CD in Excel format.

Retail Chains

Founded the ground breaking salon chains **Midnight Sun®** in 1979 and **Solar Planet®** in 1994.

Trademarks

Established and launched industry trademarks such as Original Dr. Müller, VHP - Very High Performance, Giant Sun, Onyx, Orbit, Omega, Sonic, Orion, Odyssey, Shuttle, The Total Salon Concept and Breeze.

© Supra Technologies 2006. All rights reserved. Supra®, Filtered Sunlight® & Sunshine Vitamine® are registered trademarks of Supra Technologies.



PO Box 471011

San Francisco, CA 94147



SUPRA[®]
TECHNOLOGIES

986 Salvador Avenue

Napa, CA 94558

Solar Planet Inc., a California Corporation

October 16, 2007

Mr. Anthony Kirkwood, Health Physicist
Nuclear Materials Licensing Section
US Nuclear Regulatory Commission, Region IV
Mailstop T - 8F3
Washington D.C. 20555-0001

Regarding: Solar Planet Inc., dba Supra Technologies, CA License # 7669-28
Osram/Sylvania NRC license number 20-30024-02E

Dear Mr. Kirkwood,

Information requested by the NRC

We have enclosed in this mail drawings of the 400 watt lamp produced by Radium. The drawings shows the typical arc tube, quartz burner and the lamp with a socket, the 400 watt 230 v R7s. This lamp is sold in the USA under the Supra and Radiance brand. It is available as follows: 4500SI (R7s), 4500WL (Wire lead) and 3520PIJK (GY9.5), the parenthesis depicting the type of lamp socket used.

1) Dimensions and thickness of the quartz arc tube and dimensions of the lamp:

The Technical Drawing Radium 400 watt, which also states that the lamp contains Kr-85.

Please note that all dimensions on all drawings are in metric in millimetres (mm).

2) How is the arc tube attached to the lamp body?

The lamp consists of the burner (sealed arc tube) and socket (fixed with cement) only. There is no lamp body, because there is no outer bulb.

3) Tests performed:

After the filling process the lamp voltages of all lamps are monitored. A burner which is not within the limits of the specification is regarded as a possible "leaker" and is discarded. After putting the socket on the burner all lamps are burnt in. A lamp passing this test is considered to be o.k. because a leaking lamp would not start up.

4) Labels

Sample labels are enclosed, new October 16, 2007. Labelling consists of:

1. Etching: On the ceramic lamp ends, brand and model as well as 3 digit manufacturing code to trace lamp manufacturing. The symbol Kr-85 will also be etched on all lamps, except the R7s 400 watt lamp, on all new production effective December 1, 2007.
2. Individual Box Labels:
 - New Production in Germany will utilize a label such as supplied with this letter, stating: Contains Kr-85.
 - Lamps produced and in stock in Germany will be stamped with the symbol Kr-85 on box end next to model #, prior to shipment from Germany.
 - Lamps in stock in our warehouse in Napa, CA will be stamped with the symbol Kr-85 on box end next to model #, prior to shipment from Napa. This will be performed by Leif Vasstrom.
 - User Instructions inside the box for all new production, effective December 1, 2007, will have state: Contains Kr-85 – on the bottom left corner of all three labels forwarded to you with this letter.
 - There are no lamps in transit at this time.
3. Labels are also attached to the outside shipping box. All lamps are packed 25 to a box when shipped from Germany. The symbol Kr-85 will be listed on the outside box label. Current boxes in Germany and Napa, CA will be stamped with the symbol Kr-85.

5) Measurements

The filling devices are tested and controlled once a week. This is done by controlling the filling pressure of a burner, one that is actually being produced. The quantity of Kr-85 in the arc tube is a function of the specific activity of the filling gas and the volume of the arc tube. Each tank of the Argon-Krypton-85-mixture received from the supplier, comes with a certification concerning the Krypton-85 concentration. The determining parameter for the volume with a given diameter, is the pinching distance. This value is controlled twice every shift for each different type of product produced. No lamp contains more than 4,440 Bq (= 120 nanocuries).

6) Quality control

After pinching, every burner is checked visually. Burners with cracks or channels in the pinch are discarded.

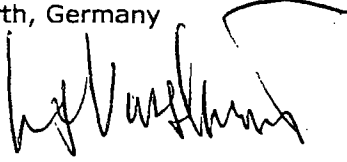
After the filling every burner is lit and the lamp voltage is monitored. Burners not within the specified parameters are destroyed.

After putting the socket on every lamp is burnt in. Lamps failing this test are being destroyed.

Throughout production, life and reliability tests are performed on a regular basis, e.g. 3 lamps per type and day are tested for electrical parameters and UV-output.

This information has been supplied to us by:
Mr. Uwe Kalmbach,
Radium Lampenwerk GmbH
Development UV/IR
Dr.-Eugen-Kersting-Straße 6
51688 Wipperfürth, Germany

Leif Vasstrom
Principal
Solar Planet Inc., dba Supra Technologies

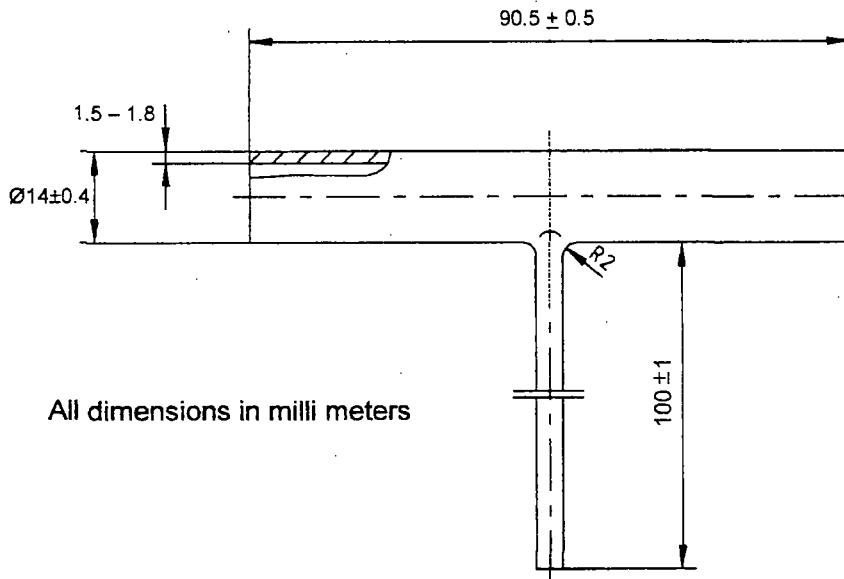


c.c. Linda Gersey, NRC Region IV

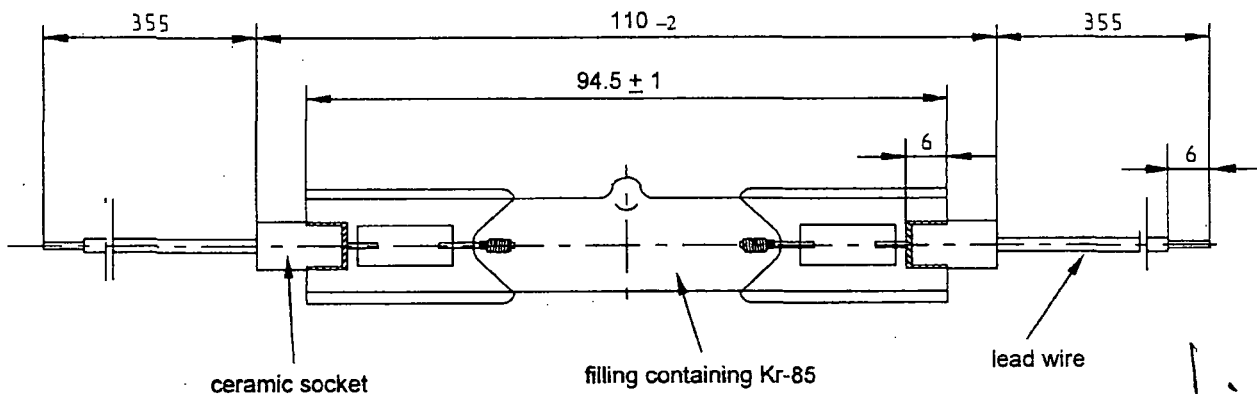
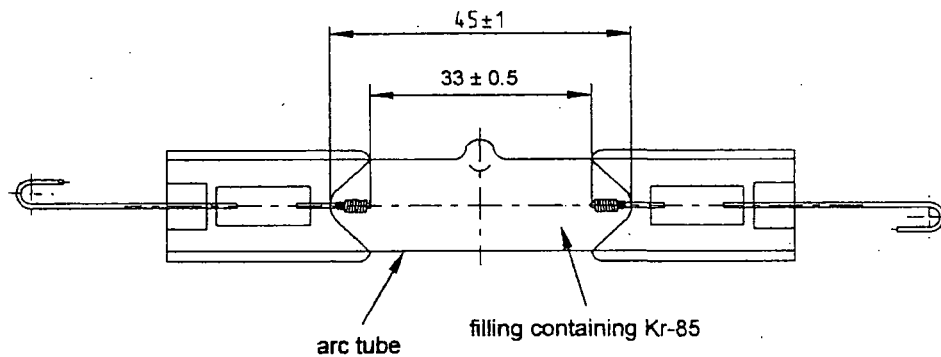
Enclosures: Technical Drawing Radium 400 watt
Sample Label Print Outs, Instructions and Box with label,

Radium Lampenwerk, Wipperfürth, Germany October 16, 2007

This document shows a typical arc tube, quartz burner and lamp with socket (R7s in 400W/230 v.). This lamp is sold in the USA and Canada under the brands Supra and Radiance. This lamp contains Kr 85. Lamps sockets used: R7s, WL & GY9.5.

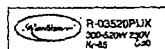


All dimensions in milli meters



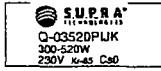
big

lamp etch - original size



by

lamp etch - original size



by

25 Pieces



Q-04500SI

400-500W

230V

Made in Germany

contains Kr-85

323 14412

W

25 Pieces



R-04500SI

400-500 W

230V

SKU # 03060

**Made in Germany
contains Kr-85**

323 14446

USER INSTRUCTIONS

"Sunlamp -DANGER – Ultraviolet radiation. Follow instructions. Avoid overexposure. As with natural sunlight, overexposure can cause eye and skin injury and allergic reactions. Repeated exposure may cause premature aging of the skin and skin cancer. **WEAR PROTECTIVE EYEWEAR; FAILURE TO MAY RESULT IN SEVERE BURNS OR LONG-TERM INJURY TO THE EYES.**

Medications or cosmetics may increase your sensitivity to the ultraviolet radiation. Consult physician before using a sunlamp if you are using medications or have a history of skin problems or believe yourself especially sensitive to sunlight. If you do not tan in the sun, you are unlikely to tan from the use of this product."

- Disconnect fixture before removing and installing lamp.
- Use ONLY in fixture equipped with a timer and appropriate filters.
- Use only in equipment originally designed for this product.
- Consult and follow instructions for lamp installation provided in equipment manual.
- Avoid overexposure. Always wear protective eyewear!
- Do not touch the lamp with bare fingers. Remove any spots with clean, lint-free cloth and alcohol.
- Handle with care to avoid breakage or any mechanical damages. Manufacturer and authorized importers cannot be held responsible for any personal injury and damages that may result from improper installation and/or use of this lamp.



Call Supra Technologies LLC at 800-959-1255 or your local distributor for more information.

Supra[®] HID Quartz Lamp Q-04500SI

**400-500 Watt, 230 Volt High Intensity Discharge Lamp
For use in sunlamp products.**

This product conforms to the amended performance
standard for sunlamp products under 21 CFR 1040.20.

**"Sunlamp-DANGER-Ultraviolet radiation. Follow instructions."
"Use ONLY in fixture with equipped with a timer."**

FDA number: 8720182-10

Manufactured: September 2007

Call Supra Technologies LLC at 800-959-1255
or your local distributor for more information.

contains Kr-85

Made in Germany.

323 14412



USER INSTRUCTIONS

"Sunlamp -DANGER – Ultraviolet radiation. Follow instructions. Avoid overexposure. As with natural sunlight, overexposure can cause eye and skin injury and allergic reactions. Repeated exposure may cause premature aging of the skin and skin cancer. **WEAR PROTECTIVE EYEWEAR; FAILURE TO MAY RESULT IN SEVERE BURNS OR LONG-TERM INJURY TO THE EYES.**

Medications or cosmetics may increase your sensitivity to the ultraviolet radiation. Consult physician before using a sunlamp if you are using medications or have a history of skin problems or believe yourself especially sensitive to sunlight. If you do not tan in the sun, you are unlikely to tan from the use of this product."

- Disconnect fixture before removing and installing lamp.
- Use ONLY in fixture equipped with a timer and appropriate filters.
- Use only in equipment originally designed for this product.
- Consult and follow instructions for lamp installation provided in equipment manual.
- Avoid overexposure. Always wear protective eyewear!
- Do not touch the lamp with bare fingers. Remove any spots with clean, lint-free cloth and alcohol.
- Handle with care to avoid breakage or any mechanical damages. Manufacturer and authorized importers cannot be held responsible for any personal injury and damages that may result from improper installation and/or use of this lamp.



HID Quartz Lamp

400-500 Watt, 230 Volt High Intensity Discharge Lamp
For use in sunlamp products.

This product conforms to the amended performance
standard for sunlamp products under 21 CFR 1040.20.

"Sunlamp-**DANGER**-Ultraviolet radiation. Follow instructions."
"Use ONLY in fixture with equipped with a timer."

FDA number: 8720182-13

Manufactured: September 2007

Made in Germany.

contains Kr-85

323 14446





The Supra® Collection

Highest Output of mw/cm² in the Industry.™

Model Q-04500SI / 230 v. 400-500 w.

Made in Germany - FDA #8720182-10

Supra®

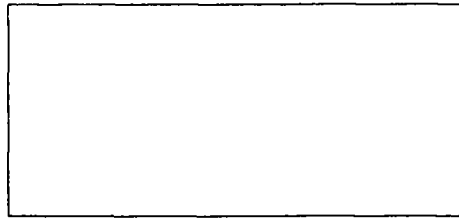
Q-04500SI

400-500W

230V

contains Kr-85

King



Radiance™ HP
Highest HP output in the industry!

R-04500SI
400-500W
230V
SKU # 03060
contains Kr-85



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-4005

November 16, 2007

Supra Technologies
Attn.: Mr. Leif Vasstrom
P.O. Box 471011
San Francisco, California 94147

SUBJECT: NRC INSPECTION REPORT NO. 999-0004/07-001 AND NOTICE OF VIOLATION

Dear Mr. Vasstrom:

This refers to the telephonic inspection conducted for Supra Technologies located in San Francisco, California, Inspection Report No. 999-0004/07-001. This inspection is based on the telephone conversation with Linda M. Gersey and yourself on August 15, 2007, and subsequent discussions. The purpose of the inspection was to determine if Supra Technologies had distributed tanning bed bulbs containing byproduct material, specifically krypton-85 (Kr-85), without a Nuclear Regulatory Commission (NRC) exempt-distribution license.

Per your discussion with Ms. Gersey, you stated that Supra Technologies had imported tanning bed lamps containing Kr-85 from Radium Lampenwerk Wipperfurth, (Radium), located in Wipperfurth, Germany. You stated to the NRC inspector that you had distributed five lamp types manufactured by Radium, which contained Kr-85 since March 2007 without an exempt distribution license.

It is our understanding that you had been informed by Radium that the tanning bed bulbs containing Kr-85 provided by Radium complied with NRC regulations. This assessment made by Radium was based on a misinterpretation of 10 CFR 30.70, Schedule A - Exempt concentrations. Radium incorrectly believed and had informed you that 10 CFR 30.70 pertained to the concentration of radioactivity in a product and if the product distributed did not exceed the concentration of radioactivity specified in Schedule A it would be exempt from NRC regulations. However, the inspector explained to you that the exempt concentrations listed in 10 CFR 30.70 apply only to the quantities of radioactive material that a 10 CFR Part 32 specific licensee can distribute to persons who are exempt from NRC regulations (i.e., persons without a license). Consequently, an exempt distribution license is still required pursuant to the provisions of 10 CFR 30.3 and 10 CFR 32.14, for products described in 10 CFR 30.15(a)(8), which includes "electron tubes" or tanning bed bulbs. Also, a specific byproduct material license from the State of California would be required to possess the requisite byproduct material.

Additionally, our inspection determined that these tanning bed bulbs did not have the appropriate labeling as required by 10 CFR 32.15(d). Specifically, each tanning bed bulb and container must be marked or labeled identifying the manufacturer or initial distributor, and the byproduct material contained in the bulb.

After learning that you were in noncompliance of NRC regulations, you committed to Ms. Gersey to do the following: 1) immediately cease distribution of tanning bed bulbs containing Kr-85; 2) obtain a NRC exempt-distribution license; and 3) obtain a State of California possession license. Based on the results of this inspection, the NRC has determined that two Severity Level IV violations of NRC requirements had occurred. The violations were evaluated in accordance with the NRC Enforcement Policy included on the NRC's Web site at www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html. The violations are cited in the enclosed Notice of Violation (Notice) and the circumstances surrounding the violations are described in detail in the body of this letter. The violations are being cited in the Notice because they were identified by the NRC.

The NRC has concluded that information regarding the reason for the violations, the corrective actions taken and planned to correct the violations and prevent recurrence is already adequately addressed on the docket in Inspection Report No. 999-0004/07-001. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosure, and your response, if you choose to provide one, will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Sincerely,

/RA/

Vivian H. Campbell, Chief
Nuclear Materials Safety Branch A

Docket No. 999-0004

Enclosure: Notice of Violation

cc w/Enclosure
California Radiation Control Program Director

Supra Technologies

-3-

bcc w/Enclosure 1 (via ADAMS distrib):

LDWert
CLCain
VHCampbell
JEWhitten
LMGersey
RITS Coordinator
ACES

ML073201206

SUNSI Review Completed: ADAMS: ☒ Yes Initials: LMG
☒ Publicly Available ☒ Non-Sensitive

Doc. Name:s:\dnms\!nmib\~reports in concurrence\ Supra Technologies NOV.doc

final r:\ dnms

RIV:DNMS:NMSB-B	C:NMSB-B	SAC	C:NMIB
LMGersey	JEWhitten	HFreeman	VHCampbell
/RA VHC for/ lgm via E	/RA/	/RA/ - via E	/RA/
11/ 7 /07	11/16/07	11/13/07	11/16/07

OFFICIAL RECORD COPY

T=Telephone E= E-Mail F=Fax

NOTICE OF VIOLATION

Supra Technologies
San Francisco, California

Docket No. 999-0004

During an NRC inspection conducted telephonically on August 15, 2007, and subsequent conversations, two violations of NRC requirements were identified. In accordance with the NRC Enforcement Policy, the violations are listed below:

- (1) 10 CFR 30.3 requires, in part, that no person shall transfer byproduct material except as authorized in a specific license issued pursuant to the 10 CFR Part 30.

Contrary to the above, Supra Technology transferred byproduct material without obtaining a specific license pursuant to 10 CFR Part 30. Specifically, Supra Technology distributed tanning bed bulbs containing krypton-85 from March 2007 through August 2007 without a NRC exempt-distribution license.

This is a Severity Level IV violation (Supplement VI)

- (2) 10 CFR 32.15(d), states, in part, that labeling or marking is required for each unit and its container so that the manufacturer or initial transferor of the product and the byproduct material in the product can be identified.

Contrary to the above, Supra Technology failed to label or mark each unit and its container so that the manufacturer or initial transferor of the product and the byproduct material in the product can be identified. Specifically, the tanning bed bulbs containing krypton-85 that were distributed by Supra Technology were not labeled or marked identifying the manufacturer or initial transferor of the product and the byproduct material in the product.

This is a Severity Level IV violation (Supplement VI)

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence and the date when full compliance will be achieved is already adequately addressed in Inspection Report No. 999-004/07-001. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation; NRC Inspection Report No. 999-0004/07-001" and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator RIV, 611 Ryan Plaza Drive, Suite 400, Arlington, Texas, 76011, within 30 days of the date of the letter transmitting this Notice.

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's document system (ADAMS), accessible from the NRC Web site at www.nrc.gov/reading-rm/pdr.html and www.nrc.gov/reading-rm/adams.html. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

Enclosure

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days.

Dated this 16th day of November 2007



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555 - 0001

May 19, 2009

Supra Brands Group LLC
ATTN: Mr. Leif Vasstrom
986 Salvador Avenue
Napa, CA 94558

SUBJECT: EXEMPT DISTRIBUTION LICENSE NO. 04-23959-01E, AMENDMENT NO. 03

Dear Mr. Vasstrom:

Enclosed is the Nuclear Regulatory Commission (NRC) License No. 04-23959-01E, amendment No. 03, as requested in your letter dated April 10, 2009, authorizing the distribution of UV lamps containing less than 30 microcuries of Krypton-85 per lamp, to persons exempt from the regulations. It is our understanding that these lamps are identical to those already described in previous submittals to the NRC, with the exception of brand names and/or model numbers. You should contact us immediately if this understanding is not accurate.

Please review the enclosed documents carefully and be sure that you understand all the conditions. If there are any errors or questions, please contact me so that appropriate corrections and answers can be provided.

Please be advised that you must conduct your program involving radioactive materials in accordance with the conditions specified in your NRC license, representations made in your license application, and other rules, regulations, and orders of the U.S. Nuclear Regulatory Commission, now or hereafter in effect, to include the following:

1. Comply with applicable NRC regulations in 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"; 10 CFR Part 32, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material"; and other applicable regulations.
2. Distribute only those products containing radioactive material which are specifically authorized in your license.
3. Notify NRC in writing within 30 days of any change in mailing address.
4. Request and obtain appropriate amendments if you plan to change control or ownership of your organization, change locations of distribution of products containing radioactive material, or make any other changes in your program which are contrary to the license conditions or representations made in your license application and any supplemental correspondence with NRC.

5. Submit a complete renewal application or termination request at least 30 days before the expiration date on your license. You should receive a reminder notice approximately 90 days before the expiration date. Continued distribution of products containing radioactive material after your license expires is a violation of NRC regulations.
6. In accordance with 10 CFR 30.36, request termination of your license if you plan to permanently discontinue activities involving distribution of products containing radioactive material.

You will be periodically inspected by NRC. Failure to conduct your program in compliance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC may result in enforcement action(s) against you. This could include issuance of a notice of violation; proposed imposition of a civil penalty; or an order suspending, modifying, or revoking your license as specified in the "General Statement of Policy and Procedures for NRC Enforcement Actions," (NUREG-1600).

In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

If you have any questions, please feel free to contact me at (301) 415-5477 or by e-mail: Richard.Struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer
Licensing Branch
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

Docket No. 030-37553

Enclosure: Lic. No. 04-23959-01E

L. Vasstrom

- 2 -

5. Submit a complete renewal application or termination request at least 30 days before the expiration date on your license. You should receive a reminder notice approximately 90 days before the expiration date. Continued distribution of products containing radioactive material after your license expires is a violation of NRC regulations.
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/RA/

Richard K. Struckmeyer
Licensing Branch
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Docket No. 030-37553

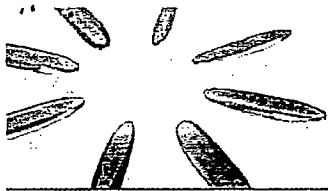
Enclosure: Lic. No. 04-23959-01E

DISTRIBUTION: JFoster MMoriarty Region I/DNMS/LAS Brenda Brown, Fees

ML091100554 (pkg.)

OFC	FSME:MSSA						
NAME	RStruckmeyer						
DATE	05/19/2009						

OFFICIAL RECORD COPY



Vorläufige Version Preliminary version

Halogen Metalldampf Lampe Metal Halide Lamp

HRI-T 400W/Collagen GY9,5

Elektrische Größe / electrical data

Leistungsaufnahme lamp power	(W)	390
Netzspannung supply voltage	(V)	230
Drosselnennstrom nominal choke current	(A)	3,5
Brennspannung lamp voltage	(V)	120
Strahlerstrom lamp current	(A)	3,5

Strahlungsphysikalische Größen / spectral data

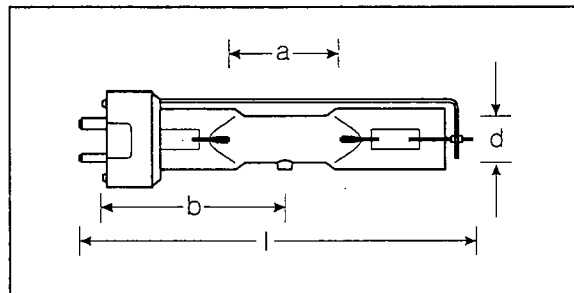
Lichtstrom luminous flux	(lm)	30000
Farbtemperatur color temperature	(K)	2200
Strahlungsrückgang nach 500 h auf change in radiation flux after 500 h to	(%)	70

Betriebsbedingungen / operating conditions

Brennlage burning position		p45
Min. Kolbentemperatur min. bulb temperature	(°C)	650
Max. Kolbentemperatur max. bulb temperature	(°C)	950
Max. Quetschungstemperatur max. pinch temperature	(°C)	350
Vorschaltgerät ballast	HQ-KVG 400W HQ CCG 400W	
Zündgerät ignitor	(kV)	4 - 5
Kompensationskondensator p.f. correction capacitor	(µF)	35

Bemerkung / notice

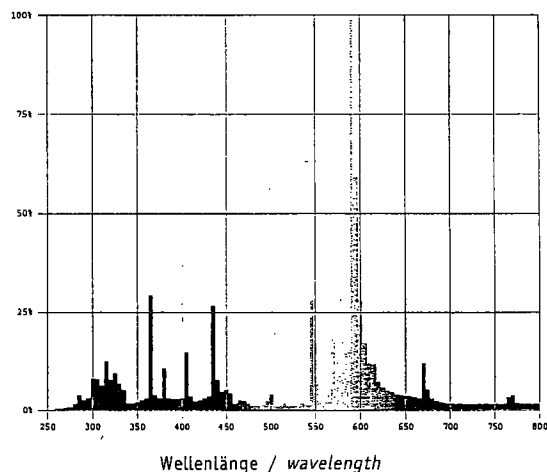
Die technischen Daten sind Nennwerte. Einzelexemplare können Abweichungen von bis zu 10% aufweisen.
The technical data given are nominal values. Variations up to 10% with single lamps are possible.



Abmessungen / geometric data

Gesamtlänge overall length	(mm)	l	114
Elektrodenabstand electrode distance	(mm)	a	33
Lichtschwerpunkt light center length	(mm)	b	53
Entladungsrohrdurchmesser tube diameter	(mm)	d	14
Sockel base			GY9,5

Spektrale Strahlungsverteilung / spectral radiation distribution



Bemerkung / notice

Durchschlagsspannung im Sockel > 5kV (minimaler Kontaktabstand im Sockel > 4 mm)
Breakdown voltage inside the base > 5kV (minimum distance between electrical contacts > 4mm)

Only for internal use

Radium

This document is not controlled in printed form and may only be copied and passed on in compliance with the regulations for information security. The current valid document version as well as the history of changes are electronically kept in the EDOS system.

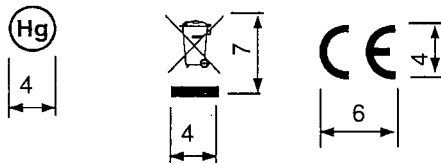
Title English	marking Beauty Light GY9.5	Status & Code	RL: Released		
Add. classification		EDOS No. [Vers][Part]	ZMR	2709531	[00] [000]
Last change	500000300512 Dokument anlegen	Valid from:	04 April 2011		

Titel Deutsch: Stempelung Beauty Light GY9.5

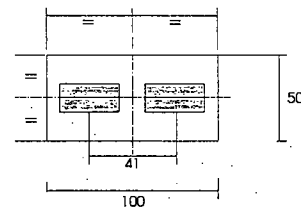
<p>Stempelfeld</p>																													
<p>Schriftgröße in Punkt</p> <p>Schriftart:</p> <p>Helvetica leicht</p>	<p>Beispiel (Daten der einzelnen Lampentypen siehe Tabelle)</p> <table border="1"> <tr> <td>A =</td><td>BEAUTY LIGHT</td><td>6</td></tr> <tr> <td>B =</td><td>400W</td><td>6</td></tr> <tr> <td>C =</td><td>ELT</td><td>6</td></tr> <tr> <td>D =</td><td>1505816</td><td>4</td></tr> <tr> <td>E =</td><td>F-00</td><td>4</td></tr> <tr> <td>F =</td><td>Hg-Symbol</td><td>4x4</td></tr> <tr> <td>G =</td><td>WEEE-Symbol</td><td>7x4</td></tr> <tr> <td>H =</td><td>CE-Symbol</td><td></td></tr> <tr> <td>I =</td><td>Herstellungskennzeichen nach ZMR 2431708</td><td>4</td></tr> </table>	A =	BEAUTY LIGHT	6	B =	400W	6	C =	ELT	6	D =	1505816	4	E =	F-00	4	F =	Hg-Symbol	4x4	G =	WEEE-Symbol	7x4	H =	CE-Symbol		I =	Herstellungskennzeichen nach ZMR 2431708	4	
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Werkstoff	Kunststoff- oder Metallklischee (Tampondruck)
Stempelort	Sockel

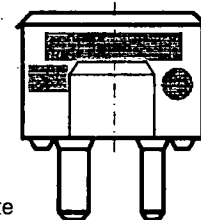
***) Muster:**



Klischeeausführung:



Art.-Nr.	Stempelfeldangaben		
	B	C	D
323 17564	400W	ELT	1505816



GY9,5
Vorderseite