



APPLICATION FOR MATERIALS LICENSE

Estimated burden per response to comply with this mandatory collection request: 4.3 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments regarding burden estimate to the FOIA, Privacy, and Information Collections Branch (T-5 F53), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by internet e-mail to Infocollections.Resource@nrc.gov, and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-10202, (3150-0120), Office of Management and Budget, Washington, DC 20503. If a means used to impose an information collection does not display a currently valid OMB control number, the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW. *AMENDMENTS/RENEWALS THAT INCREASE THE SCOPE OF THE EXISTING LICENSE TO A NEW OR HIGHER FEE CATEGORY WILL REQUIRE A FEE.

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

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

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

SEND APPLICATIONS TO:

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

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN,
SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,
LOUISIANA, MISSISSIPPI, MONTANA, NEBRASKA, NEVADA, NEW MEXICO, NORTH
DAKOTA, OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS,
UTAH, WASHINGTON, OR WYOMING,

SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
1600 E. LAMAR BOULEVARD
ARLINGTON, TX 76011-4511

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

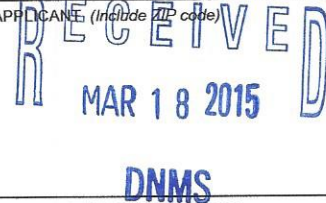
1. THIS IS AN APPLICATION FOR (Check appropriate item)

- ☐ A. NEW LICENSE
☐ B. AMENDMENT TO LICENSE NUMBER
☒ C. RENEWAL OF LICENSE NUMBER

04-23929-01E

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

Lumondi Inc.
2301 Kerner Blvd
Suite A
San Rafael, CA, 94901



3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

2301 Kerner Blvd
Suite A
San Rafael, CA, 94901

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Max W. Robertson

BUSINESS TELEPHONE NUMBER
(415) 455-9500

BUSINESS CELLULAR TELEPHONE NUMBER
(415) 720-3590

BUSINESS EMAIL ADDRESS
maxrluminox@aol.com

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL

- a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time.

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

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

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

10. RADIATION SAFETY PROGRAM.

9. FACILITIES AND EQUIPMENT.

11. WASTE MANAGEMENT.

**12. LICENSE FEES (Fees required only for new applications, with few exceptions*)
(See 10 CFR 170 and Section 170.31)**

FEE CATEGORY

AMOUNT
ENCLOSED \$

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

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM 2, CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10, CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 37, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25, 1948 62 STAT. 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A 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

Max W. Robertson

SIGNATURE

DATE

3/16/2015

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY			DATE		
					586355

1. Please see attached State of California license with highlights to answer questions 5,6,7,8, 9, 10
2. With regards to Waste Management, we distribute complete time pieces so we do not have "waste" to dispose. I have spoken with the tube producer MB-microtec and they have informed us that if we ever do need to dispose of tubes, we could send them back to them for disposal at their facility.

Thank you.

Max W. Robertson

BY: _____

Page 1 of 2 pages

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 Department of Health Services now or hereafter in effect and to any standard or specific condition specified in this license.

1. Licensee	Lumondi, Inc.	3. License Number	7596-21	Amendment Number :	
2. Address	2301 Kerner Boulevard, Suite A San Rafael, CA 94901	4. Expiration date	May 18, 2017	(5)	
Attention:	Barry S. Cohen President	5. Inspection agency	Radiologic Health Branch North		

6. Nuclide	7. Form	8. Possession Limit
A. Hydrogen-3	A. Scaled gaseous tritium light sources (mb-microtec Models 400/1, 400/2, 400/3)	A. Not to exceed 500 Curies total, contained within 20,000 timepieces. (25 millicuries per timepiece: 5 millicuries per hand and 15 millicuries per dial)

9. Authorized Use

- A. To be used for the receipt, inspection, storage, and initial transfer of timepieces, mb-microtec Models 100/1, 100/2, 100/3, 100/4 and 100/5, incident to distribution to persons exempt from licensing in accordance with a U.S. Nuclear Regulatory Commission Exempt Distribution License issued pursuant to 10 CFR Part 32, Section 32.14 and 10 CFR Part 30, Section 30.15.

LICENSE CONDITIONS

10. Radioactive material shall be used or stored only at the following location:

(a) 2301 Kerner Boulevard, Suite A, San Rafael, 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) Max W. Robertson
(b) Michael Shane Brightwell, CHP
(c) Adam L. Berry

RADIOACTIVE MATERIAL LICENSELicense Number: 7596-21

Amendment Number:

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 with attachments dated December 8, 2006, as modified by the letters with attachments dated April 5, 2007, and May 4, 2007, all signed by Barry S. Cohen, President, Co-CEO.
14. The Radiation Safety Officer in this program shall be Max W. Robertson.
15. The licensee shall conduct a physical inventory every six months to account for all sealed sources and/or devices received and possessed under the license. Records of the inventories shall be maintained for inspection, and may be disposed of following Department inspection.

Issued for the State Department of Health Services

Date:

5/30/07

By:

John G. Fassell

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

Subj: **NRC Licensing Testing Etc**
Date: 10/22/2012 11:54:26 A.M. Pacific Standard Time
From: MaxRLuminox@aol.com
To: pkuhn@edwardswildman.com

Perla,

Here is a summary of the procedures for "testing" watches here in the US warehouse.

Basically we receive an invoice from L&M for the watches that are being sent to us. A portion of these watches have been tested in Switzerland by the company that makes the tritium tubes (MB-Microtec):

<http://www.mbmicrotec.com/en>

Next step is for us to do a dark room inspection of based on the number of watches that are in the shipment to us. I have attached the Lot-Test sheet for you, but basically the guys will roll a cart of watches into the closet in our hallway in the warehouse, turn off the lights and visually inspect the watches to make sure that all of the tubes are glowing. We have yet to find a watch that does not have the tubes glowing.

Next the watches are put back on the shelf for storage and subsequent sale.

At the end of the year I am required to report how many watches we sold and the corresponding amount of tritium material in these watches that was distributed. (see attached)

We also are randomly audited by the NRC and California NRC periodically to ensure that we have kept records of the incoming watches and that we are compliant with the program we have in place.

We have been audited by the state two times 2006 & 2007 (see attached results) and once by the NRC. The NRC audit simply revealed that we had not filed a Tritium Distribution report, but I quickly came into compliance on this and we have been compliant ever since.

I have also attached copies of our Radiation Safety Officer identification and a copy of the manual that we were tested on to be compliant. The test is open book.....

Hope this all helps.

Max W. Robertson
Director of U.S. Operations
Lumondi Inc./Luminox Watch Company
415-455-9500 ext. 108
415-634-2713 (efax)
www.luminox.com

QC-3: U.S. Distributor Certificate of Quality Control Testing

Sealed Source Device (SSD) – Lumondi, Inc. Timepieces Containing Gaseous Tritium Light Sources (GTLS)

SSD Model: _____

SSD Production Lot Number: _____

SSD US NRC License Number: _____

1. Manufacture Requirements for Production Lots of Assembled SSD

All SSDs used are taken from production lots that have been accepted by the manufacturer as meeting all requirements set forth in the QC Program.

2. Exempt Distribution Requirements of Production Lots of Assembled SSD

Visual inspections of final packaged SSD in accordance with the LTPD requirements of the QC Program:

2.1 Visual inspection of timepiece for proper markings/labeling (design conformity).

2.2 Visual inspection of GTLSs in timepiece for proper brightness (leakage).

Inspection Results

Lot Size = _____ units

Sample Size = _____ units

Acceptance Number = 0 units

2.1 Visual inspection of timepieces for proper markings/labeling: Pass / Fail

2.2 Visual inspection of GTLSs in timepieces for proper brightness: Pass / Fail

Comments: _____

Production Lot Number _____ is Accepted / Rejected

Licensee Representative Signature

Certification Date

ATTACHMENT C

Statement of Training and Experience Form RH-2050-A

Max Robertson

STATEMENT OF TRAINING AND EXPERIENCE
(Use additional sheets as necessary.)

Instructions: Each individual proposing to use radioactive material is required to submit a Statement of Training and Experience (RH 2050 A) in duplicate to: California Department of Health Services, Radiologic Health Branch, MS 7610, Licensing Section, P.O. Box 997414, Sacramento, CA 95899-7414. Physicians should request form RH 2000 A when applying for human-use authorizations. Radiographers should request form RH 2050 IR. For more information, go to www.dhs.ca.gov/rhb or phone (916) 327-5106.

1. Name of proposed user Max W. Robertson	Position title Operations Manager, Lumondi, Inc.		
Employer address (number, street) 301 Poplar Avenue, Suite 8	City Mill Valley	State CA	ZIP code 94941
Radioactive materials license number	Radioactive materials license name		

2. **Training**

a. College or university ☒ Yes ☐ No

Name of college or university
University of San Diego

City
San Diego

State
California

Years completed
4

Degree
BA

Course of study
English

b. Education specifically applicable to use of radioactive material

Basic Radiation Safety Training for Radiological Workers and Authorized Users - Lumondi, Inc.

3. **Experience**

a. List experience with use of radioactive materials beginning with most recent:

(1) Dates
From: April 2006 To: Present

Employer
Lumondi, Inc.

Title(s) and duties
Operations Manager

Radioactive materials license number
NRC RML #29-23921-01 / NRC EDL #29-23921-02E

Date
4/30/05 - 5/31/05

Employer address (number, street)
81 Ruckman Road

City
Closter

State
NJ

ZIP code
07624

(2) Dates
From: N/A To:

Employer

Title(s) and duties

Radioactive materials license number

Date

Employer address (number, street)

City

State

ZIP code

(3) Dates
From: N/A To:

Employer

Title(s) and duties

Radioactive materials license number

Date

Employer address (number, street)

City

State

ZIP code

(4) Dates
From: N/A To:

Employer

Title(s) and duties

Radioactive materials license number

Date

Employer address (number, street)

City

State

ZIP code

b. Indicate the facilities and operations where training was received and refer to Part 3.a. when answering the following:

<input type="checkbox"/> Laboratories using radiochemicals	<input type="checkbox"/> (1)	<input type="checkbox"/> (2)	<input type="checkbox"/> (3)	<input type="checkbox"/> (4)
<input type="checkbox"/> Restricted area laboratories	<input type="checkbox"/> (1)	<input type="checkbox"/> (2)	<input type="checkbox"/> (3)	<input type="checkbox"/> (4)
<input type="checkbox"/> Glove boxes	<input type="checkbox"/> (1)	<input type="checkbox"/> (2)	<input type="checkbox"/> (3)	<input type="checkbox"/> (4)
<input type="checkbox"/> Field operations	<input type="checkbox"/> (1)	<input type="checkbox"/> (2)	<input type="checkbox"/> (3)	<input type="checkbox"/> (4)
<input type="checkbox"/> Environmental applications	<input type="checkbox"/> (1)	<input type="checkbox"/> (2)	<input type="checkbox"/> (3)	<input type="checkbox"/> (4)
<input checked="" type="checkbox"/> Other (please describe) <u>Rad Training, Llc. Activities Performed</u>	<input checked="" type="checkbox"/> (1)	<input type="checkbox"/> (2)	<input type="checkbox"/> (3)	<input type="checkbox"/> (4)

c. Radioactive materials previously used. Identify typical radioisotopes in appropriate box and refer to Part 3.a. on page 1:

	QUANTITIES HANDLED			
	(a) Microcuries	(b) Millicuries	(c) Curies	(d) Kilocuries
(1) Sealed sources		H-3, 25 per SSD		
(2) Unsealed Alpha emitters				
(3) Unsealed beta-gamma emitters				
(4) Neutron sources				

d. Describe the procedures similar to those proposed in which you have had experience. Indicate months or years for each and refer to Part 3.a. on page 1.

1. Basic Radiation Safety Training for Radiological Workers and Authorized Users (April 2006)
2. Performance of licensed activities (April 2006)

4. Certificate

The information you are asked to provide on this form is requested by the California Department of Health Services, Radiologic Health Branch. This notice is required by Section 1798.17 of the Information Practices Act of 1977 (Code of Civil Procedure, Section 1798-1798.76) and the Federal Privacy Act to be provided whenever an agency requests personal or confidential information from any individual. It is mandatory that you furnish the information requested on this form. Failure to furnish the requested information may result in an inaccurate determination of statements and/or disapproval of your application.

I hereby certify that all information contained in this statement is true and correct.

Signature of proposed user

[Handwritten Signature]

Date

5/01/06

Richard Barry Marketing Group

Basic Radiation Safety Test

Radiation Safety Officer

100

Name: MAX W. ROBERTSON

Date: 4/12/06

1. Name and describe the three particles that comprise an atom.

Proton + Charge

Neutron () Neutral Charge

Electron (-) Negative Charge

2. Define radioactivity.

The process by which an atom
releases excess energy in a
measurable form.

from the
nucleus.

3. Name three types of radiation. Describe each in terms of mass, charge, penetrability (what can shield each) and why each is either an internal or external dose hazard.

Alpha 2^{+} Large Slow Moving, Low penetrability (Paper stops)
Internal Hazard

Beta 1^{-} Small Fast moving, Medium penetrability (Hand stops)
Internal Hazard.

Gamma 0^{0} (Neutral) NO MASS, FAST (Concrete) External
High penetrability because
it penetrates.

4. Describe tritium in terms of element & isotope, radiation emission type, half-life, etc.

H^3 1 - Proton
Hydrogen 1 - Electron
2 - Neutrons
Beta emission
12.3 years

Is tritium typically an external hazard? Internal hazard? Why?

Tritium is not typically an external hazard as Betas do not penetrate the epidermis.

5. Define radiological half-life.

The amount of time it takes for a radioactive element to lose one half of its radioactive material through energy (gamma, alpha) or beta emission.

6. Name the three types of electromagnetic radiation interactions with matter.

Photoelectric

Compton

Pair

7. True or False:

T/F Exposure is the unit of measure for the amount of radiation energy deposited in tissue.

REM is the exposure unit used

T/F An acute radiation dose causes more biological damage than the same level of chronic dose.

8. Natural Background Radiation:

Name two of the three primary radionuclides that contribute to terrestrial radiation.

- 1.) Uranium U-238
2.) Potassium K-40

9. Basic Radiation Protection:

- a) Define the ALARA acronym.

As Low As Reasonably Achievable

- b) Define the TEDE acronym. What is the TEDE limit for a radiation worker? Does this annual limit include all radiation received (ex: does it include background radiation doses) or what?

Total Effective Dose Equivalent, 5 rem/yr.
Excludes Background (Naturally Occurring) Radiation

10. Basic Radiation Protection:

- a) Name the three standard methods used to protect against external radiation exposure.

1. Time
2. Distance
3. Shield

- b) Describe one method used to protect workers against internal radiation exposure.

Prevention of inhalation / ingestion through the use of a ventilation hood or simple face mask / ventilator.

11. Contamination Control:

List and describe three (3) field contamination control practices.

- 1.) Vent Hood
- 2.) Glove box
- 3.) Protective Suit



SS

ST 2
219

16:30
1049
A

Extremely Urgent

Page 1 of 1

From: (415) 455-9500
MAX ROBERTSON
Lund and Inc
2301 Kerner Blvd
Suite 1
San Rafael, CA 94928

Origin ID: MHRA



SHIP TO: (415) 720-3590

BILL SENDER

US Regulatory Comm. Region IV
Nuclear Materials Licensing Branch
1600 E Lamar Blvd

ARLINGTON, TX 76011

Ship Date: 16MAR15
ActWgt 0.5 LB
CAD: 3260107/NET3610

Delivery Address Bar Code



Ref #
Invoice #
PO #
Dept #

WED - 18 MAR 4:30P
** 2DAY **

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SR FWHA

76011

TX-US

DFW



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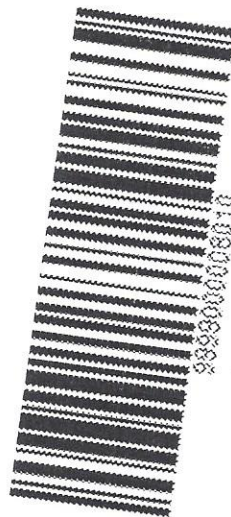
Use of this system constitutes your agreement to the service conditions in the current FedEx Service Guide, available on fedex.com. FedEx will not be responsible for any claim in excess of \$100 per package, whether the result of loss, damage, delay, non-delivery, misdelivery, or misinformation, unless you declare a higher value, pay an additional charge, document your actual loss and file a timely claim. Limitations found in the current FedEx Service Guide apply. Your right to recover from FedEx for any loss, including intrinsic value of the package, loss of sales, income interest, profit, attorney's fees, costs, and other forms of damage whether direct, incidental, consequential, or special is limited to the greater of \$100 or the authorized declared value. Recovery cannot exceed actual documented loss. Maximum for items of extraordinary value is \$1,000, e.g. jewelry, precious metals, negotiable instruments and other items listed in our ServiceGuide. Written claims must be filed within strict time limits, see current FedEx Service Guide.

FROM: Max Robertson
CARR: Federal Express
TRK#: 773139191049
RCVD: 3/18/2015

1118

TO: HILL, Carol
PH:
BDG:
RM:
PCS: 1
DNMS

MAR 14 2015



9898000008010

RTE:
MSC:

Insert shipping document here.