



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

June 11, 2015

Lumondi, Inc.  
ATTN: Max W. Robertson  
2301 Kerner Blvd, Suite A  
San Rafael, CA 94901

**SUBJECT: SECOND REQUEST FOR ADDITIONAL INFORMATION REGARDING  
LUMONDI INC EXEMPT DISTRIBUTION LICENSE RENEWAL APPLICATION**

Dear Mr. Robertson:

This letter refers to your response letter dated May 27, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML15152A370, which responds to our first request for additional information dated May 18, 2015 (ADAMS Accession No. ML15126A103). In reviewing your response letter, we have determined additional information is required to complete our review. In order to continue our review, please address the issues listed below. This information is required by 10 CFR 32.14, "Certain items containing byproduct material; requirements for license to apply or initially transfer," and described in the relevant guidance document NUREG-1556 Volume 8 titled "Program-Specific Guidance about Exempt Distribution Licenses."

1. In your letter dated May 27, 2015, you provided a list of model numbers of the watches you distribute under the exempt distribution license 04-23929-01E. In addition, you stated that the tubes used in the watches are manufactured and purchased from mb-microtec. Please provide a table that includes the model number of each timepiece (watch), the sources model number used in each timepiece, and the byproduct activity per timepiece, per hand and per dial for each timepiece model.
2. In your renewal application dated March 16, 2015 (ADAMS Accession No. ML15086A179), you included your possession license from the state of California. The possession license authorizes the receipt, inspection, storage, and initial transfer of timepieces, mb-microtec Models 100/1, 100/2, 100/3, 100/4 and 100/5. Please clarify if you are distributing mb-microtec timepieces Models 100/1, 100/2, 100/3, 100/4 and 100/5 in addition to the models listed in your response to our first request for additional information.
3. In your letter dated May 27, 2015, you stated that all watches contain a total of 25 mCi of tritium (H-3) per timepiece. As required by 10 CFR 30.15(a)(1), please provide the quantity of byproduct material per hand and per dial for each model number you distribute under your exempt distribution license no. 04-23929-01E.
4. In your letter dated May 27, 2015, you provided a description of the construction of the watches and you stated that you apply the sealed sources tubes to the hands and dials. Please provide a drawing (for each watch model) that describes the construction aspects of the product including components of the product, material of construction, dimensions, assembly methods, and source containment and shielding. Particularly, these drawings should show the locations of the sources.

5. In our letter dated May 18, 2015, we requested the proposed method of labeling or marking the container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product as required by 10 CFR 32.14(b)(6). In your letter dated May 27, 2015, you responded that all of your watches have your license transfer/import # engraved on the case back of the watch, and the dials of all your watches have the symbol T25 to designate a total activity level. Please provide an example of these markings (e.g. picture, drawing).

Any correspondence regarding your application should reference the control number specified below. Please submit the requested information within 30 days of the date of this letter. If we have not received complete information within 30 days of the date of this letter, we will assume that you do not wish to pursue your application, and we will take regulatory action to your current NRC License, 04-23929-01E.

Please be aware that you may request that certain portions of your submittal to NRC be withheld from public disclosure as proprietary information. To do this, you must execute an affidavit as specified in 10 CFR 2.390, "Public inspections, exemptions, requests for withholding." You must list all portions that you wish to be held proprietary, along with your reasoning as to why that is appropriate. While it is allowable, please refrain from submitting proprietary information in support of a license unless necessary. Keep in mind that all NRC licenses are considered to be in the public domain, and therefore may be viewed by any member of the public who requests to see them.

In accordance with 10 CFR 2.390 a copy of this letter 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/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If you have any questions, please contact me at (301) 415-6004 or electronic mail: [Hector.Rodriguez-Luccioni@nrc.gov](mailto:Hector.Rodriguez-Luccioni@nrc.gov).

Sincerely,

**/RA/**

Hector Rodriguez-Luccioni, Ph.D.  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

License No. 04-23929-01E  
Docket No. 030-37460  
Mail Control No. 586355

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Sincerely,

/RA/

Hector Rodriguez-Luccioni, Ph.D.  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal  
and Rulemaking Programs  
Office of Nuclear Material Safety  
and Safeguards

License No. 04-23929-01E  
Docket No. 030-37460  
Mail Control No. 586355

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OFC	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB	NMSS/MSTR/MSLB
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DATE	06/03/2015	06/11/2015	06/11/2015	06/11/2015

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