



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

July 13, 2015

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

SUBJECT: THIRD REQUEST FOR ADDITIONAL INFORMATION REGARDING
LUMONDI, INC EXEMPT DISTRIBUTION LICENSE RENEWAL APPLICATION

Dear Mr. Robertson:

This letter refers to your response letter dated June 17, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML1517A049, which responds to our second request for additional information dated June 11, 2015 (ADAMS Accession No. ML15153A270). 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 our letter dated June 11, 2015, we requested 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. In your letter dated June 17, 2015, you provided a table that included mb-microtec watches model number (100/1 and 100/3). The table you provided does not include the source model numbers. Please provide a table that includes the model number of the timepiece and the source model number used in each timepiece, specifically the source model number used per dial and per hand.
2. In your letter dated June 17, 2015, you provided examples of "Certificates of Quality Control/Leakage tests." The certificates mention three companies, Mondaine Watch Ltd., mb-microtec, and L&M Swiss Watch Ltd. Please clarify what is the relationship between these companies and Lumondi, Inc. Please clarify what is the role of Mondaine Watch Ltd, mb-microtec, and L&M Swiss Watch Ltd., regarding the timepieces distributed under NRC exempt distribution license 04-23929-01E.
3. In our letter dated June 11, 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 response dated June 17, 2015, you provided a picture of a watch with "3-H LX/MB-MICROTEC" engraved on it. The exempt distribution license no. 04-23929-01E authorized Lumondi, Inc. as the distributor, please provide a proposed method of labeling or marking the container with the identification of "Lumondi, Inc.," and the byproduct material in the product.

4. In our letter dated June 11, 2015, we requested a drawing that describes the construction aspects of the products 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. In your response dated June 17, 2015, you provided product spec sheets for each series of watches. The spec sheets do not show the construction aspect of the watches, please provide diagrams that describe the construction of the watches (e.g. blueprints) and the location of the sources.

Any correspondence regarding your application should reference the control number specified below. Please submit the requested information by July 30, 2015. If we have not received complete information by July 30, 2015, 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.

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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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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DATE	07/ 09 /2015	07/ 09 /2015	07/13/2015	07/13/2015

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