



July 21, 2015

United States Nuclear Regulatory Commission

Washington, DC, 20555-0001

Att: Mr. Hector Rodriguez-Luccioni, Ph. D.

Subject: 3rd Response to request for additional information regarding Lumondi Inc exempt distribution license renewal application (Licensee #04-23929-01E),

Mail Control # 586355

Mr. Rodriguez,

Please see below and attached, answers and supporting documents for Questions 1-4 for your letter dated July 13, 2015 and our phone conversation on July 21, 2015:

1. Please see attached Excel sheet, which identifies each watch and in a table and identifies the by- product of the dial & hands separately. You have also asked for the identification of the source model numbers from MB-Microtec.
2. You have asked me to clarify the relationship between the three companies listed on the testing paperwork that I provided in my last correspondence (MB-Microtec, Mondaine Watch Ltd, and L&M Swiss Watch Ltd.
 - MB-Microtec is the manufacturer of the sources
 - Mondaine Watch Ltd is the factory that assembles the complete watches
 - L&M Swiss Watch Ltd. is the company that exports the watches to us here in the United States (Lumondi Inc. dba Luminox Watch Company)

3. Per our phone conversation, I will submit an amendment to our current renewal license to add Luminox Watch Company as a DBA for our exempt distribution license no 04-23929-01E.
4. Per our phone discussion, I have requested more technical drawings (blueprints) from our factory designers to be able to provide you with the construction aspects of our products; however I am officially requesting an extension of time as I will be traveling for the next 2 weeks.

Sincerely,

A handwritten signature in black ink, appearing to read "Max W. Robertson", with a long horizontal flourish extending to the right.

Max W. Robertson

Director of U.S. Operations

Radiation Safety Officer

Lumondi Inc. **DBA** Luminox Watch Company

415-455-9500 ext 108

Maxrluminox@aol.com

[illegible]

[illegible]

[illegible]



2015 WATCH PRICE LIST

EFFECTIVE 4/1/2015

MODEL	Model#	Byproduct Activity by Watch	Sources/Dial	Byproduct Activity by Dial	Byproduct Activity per source (mCi/GBq) dial	Sources/Hands	Byproduct Activity by Hands	Byproduct Activity per source (mCi/GBq)
5241	Model 100/3	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
5121.GN	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
5127	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
5021	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
5021.GN	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
5023	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
5027	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
3054.SET	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
3055.LM	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
3058.GG	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
3063.LM	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
8809.GG	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
8813.LM	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
8819.GG	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
1822	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
1827	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035
1828	Model 100/1	Up to 25 mCi 90,925 GBq) T	400/1	less than 15 mCi (555 MBq) T	1/0.037	400/1	less than 5 mCi (185 MBq) T per hand	Hour-2,2/0.08, Minute-3,6/0.135 Sec-0.96/0.035



July 27, 2015

United States Nuclear Regulatory Commission

Washington, DC, 20555-0001

Att: Mr. Hector Rodriguez-Luccioni, Ph. D.

Subject: Amendment to (Licensee #04-23929-01E),

Mail Control # 586355

Mr. Rodriguez,

I would like to formally request an Amendment to our above referenced license. Our currently license formally recognizes Lumondi Inc. as the license holder. While this is accurate, we are known in the consumer market and do business as the Luminox Watch Company (Luminox).

I would like to request that this dba be added to our license during the current renewal process.

Sincerely,

A handwritten signature in black ink, appearing to read "Max W. Robertson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Max W. Robertson

Director of U.S. Operations

Radiation Safety Officer

Lumondi Inc. **DBA** Luminox Watch Company

NRC FORM 313

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 05/31/2015

(03-2014)
10 CFR 30, 32, 33, 34
35, 36, 37, 39, and 40APPLICATION 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, NE08-10202, (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

04-23929-01E

☐

C. RENEWAL OF LICENSE NUMBER

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

Lumondi Inc./ dba Luminox Watch Company
2301 Kerner Blvd, Suite A
San Rafael, CA, 94901

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

Lumondi Inc./ dba Luminox Watch Company
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.

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 (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

7/27/2015

FOR NRC USE ONLY

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