

Materials Safety Licensing Branch
Division of Material Safety, State, Tribal and Rulemaking Programs
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

July 13, 2018

RE: Renewal Application for Materials License, Epson America, Inc., License Number 04-23970-01E

Dear Sirs/Madams:

Attached please find a renewal application package for Epson America, Inc., License Number 04-23970-01E.

Attached you find two copies of the following:

1. Application for Materials License (Renewal) NRC Form 313
2. Suggested Format for Providing Information Requested in Items 5 Through 11 of U.S. Nuclear Regulatory Commission Form 313
3. Supplemental Sheets Responding to Items 5-11 on NRC Form 313
4. List of KR-85 containing products list
5. Organization Chart
6. Delegation of Authority for RSO (this is the original DOA submitted to the NRC and is still active and in effect. If this is not adequate, please advise)

We have had this license along with our Exempt Distribution/Possession License issued by the NRC since 2008. During this time, we have had numerous inspections by both the NRC and L.A. County Health Department (on behalf of the State of California) with no violations found. Additionally, we have had no KR-85 incidents.

If you need any additional information, please do not hesitate to contact me directly.

Respectfully,



Ron Mateas
Corporate Manager, Environmental Programs & RSO
(562) 290-5252
ron.mateas@ea.epson.com

(10-2017)
10 CFR 30, 32,
33, 34, 35, 36,
37, 39, and 40



APPLICATION FOR MATERIALS LICENSE

APPROVED BY OMB: NO. 3150-0120

EXPIRES: 06/30/2019

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 Information Services Branch (T-2 F43), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to Infocollects.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 CURRENT VOLUMES OF THE NUREG-1556 TECHNICAL REPORT SERIES ("CONSOLIDATED GUIDANCE ABOUT MATERIALS LICENSES") FOR DETAILED INSTRUCTIONS FOR COMPLETING THIS FORM: <http://www.nrc.gov/reading-rm/doc-collections/nuregs/staff/sr1556/>. SEND TWO COPIES OF THE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

MATERIALS SAFETY LICENSING BRANCH
DIVISION OF MATERIAL SAFETY, STATE, TRIBAL AND RULEMAKING PROGRAMS
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
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

IF YOU ARE LOCATED IN:

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

04-23970-01E

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

Epson America, Inc.
3840 Kilroy Airport Way
Long Beach, CA 90806

3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED

1650 Glenn Curtiss Steet, Carson, CA 90746
2350 Stafford Road, Suite 101, Plainfield, IN 46168

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Ron Mateas

BUSINESS TELEPHONE NUMBER
562-290-5252

BUSINESS CELLULAR TELEPHONE NUMBER
562-786-1911

BUSINESS E-MAIL ADDRESS
ron.mateas@ea.epson.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.

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)

*Amendments/Renewals that increase the scope of the existing license to a new or higher fee category will require a fee.

FEE
CATEGORYAMOUNT
ENCLOSED \$

PER THE DEBT COLLECTION IMPROVEMENT ACT OF 1996 (PUBLIC LAW 104-134), YOU ARE REQUIRED TO PROVIDE YOUR TAXPAYER IDENTIFICATION NUMBER. PROVIDE THIS INFORMATION BY COMPLETING NRC FORM 531: <https://www.nrc.gov/reading-rm/doc-collections/forms/nrc531info.html>.

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

Ron Mateas Corporate Manager, Environmental Programs
& RSO

SIGNATURE

DATE

7/13/18

FOR NRC USE ONLY

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



**Suggested Format for Providing Information Requested in
Items 5 Through 11 of
U.S. Nuclear Regulatory Commission Form 313**

Instructions:

If an applicant checks a box in the column marked "Description Attached," then they must provide that information on separate sheets.


| Item No. | Suggested Response | Description Attached |
|----------|--|---|
| 5. | <p>RADIOACTIVE MATERIAL</p> <p>Unsealed and Sealed Byproduct Material</p> <p>Applicants for a Type A broad scope license should request any form of byproduct material with atomic numbers from 1 through 83. The applicant should state the maximum quantity of each radionuclide to be possessed at any one time and the total cumulative quantity for all radionuclides. The applicant should separately list individual radionuclides needed in much larger quantities or in much smaller quantities than that described in the atomic number 1 through 83 request. The maximum quantities of nuclides with atomic numbers above 83 also should be listed separately.</p> | [] |
| | <p>A separate listing should be submitted for sealed sources needed in larger quantities than described in the atomic number 1 through 83 request. Applicants must provide the manufacturer's name and model number for each requested sealed source and device so that the NRC can verify that they have been evaluated in a SSD registration certificate or specifically approved on a license. Applicants must also provide the maximum activity per source and the total possession limit. For sources and devices not registered, as allowed by 10 CFR 32.210(g)(2), the applicant must have adequate training and experience and facilities and equipment to handle comparable quantities of material in any form under 10 CFR 30.33(a)(2) and (3) and must provide information about the unregistered sealed sources and devices in accordance with 10 CFR 30.32(g)(4).</p> | [<input checked="" type="checkbox"/>] |

| Item No. | Suggested Response | Description Attached |
|----------|--|----------------------|
| 5. | <p>RADIOACTIVE MATERIAL (<i>Cont'd</i>)</p> <p>Unsealed and Sealed Sources (<i>Cont'd</i>)</p> <p>Possession requests should be categorized into general areas of use (e.g., research and development activities, routine gauging activities, self-shielded irradiators, instrument calibrators, and medical applications).</p> <p>Applicants for licenses to possess radioactive materials in unsealed form, on foils or plated sources, or sealed in glass in excess of the quantities listed in 10 CFR 30.72 must include either of the following: (1) an evaluation showing that the maximum offsite dose caused by a release of radioactive materials would not exceed 0.01 Sv (1 rem) effective dose equivalent or 0.05 Sv (5 rem) to the thyroid, or (2) an emergency response plan for responding to the release in accordance with the criteria listed in 10 CFR 30.32(i)(3).</p> <p>Applicants for a Type B or Type C broad scope license should request any chemical or physical form of byproduct material specified in 10 CFR 33.100, Schedule A. Type B applicants should request the quantity of material specified in 10 CFR 33.11(b). Type C applicants should request the quantity of material specified in 10 CFR 33.11(c).</p> | |

| Item No. | Suggested Response | Description Attached |
|----------|---|--|
| | <p>Financial Assurance and Recordkeeping for Decommissioning</p> <p>State the following: "Pursuant to 10 CFR 30.35(g), 10 CFR 40.36(f), and/or 10 CFR 70.25(g) and 10 CFR 70.51(b)(3), we will maintain records important to decommissioning and transfer these records to an NRC or Agreement State licensee before licensed activities are transferred or assigned in accordance with 10 CFR 30.34(b), 10 CFR 40.46, and/or 10 CFR 70.36. Furthermore, pursuant to 10 CFR 30.51(f), 10 CFR 40.61(f), and /or 10 CFR 70.51(a)(3), prior to license termination, we will forward the records required by 10 CFR 30.35(g), 10 CFR 40.36(f), and/or 10 CFR 70.25(g) to the appropriate NRC Regional Office."</p> <p>If financial assurance is required, submit evidence of financial assurance following the guidance of NUREG-1757, Volume 3, "Consolidated Decommissioning Guidance: Financial Assurance, Recordkeeping, and Timeliness."</p> <p>Emergency Plan</p> <p>If an emergency plan is required, provide either:</p> <p>an evaluation showing that the maximum offsite dose due to a release of radioactive materials would not exceed 0.01 Sv [1 rem] effective dose equivalent or 0.05 Sv [5 rem] to the thyroid; or</p> <p>an emergency plan for responding to the release of radioactive material in accordance with the criteria listed in 10 CFR 30.32(i)(3).</p> | <p>[]</p> <p>[]</p> |
| 6. | <p>PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED</p> <p>Describe in general terms the purposes for which the licensed material will be used.</p> | <p></p> |
| 7. | <p>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE</p> <p>Executive Management</p> <p>The applicant must describe administrative controls and provisions relating to organization and management and management review necessary to ensure safe operations. The applicant should submit an organizational chart that describes the management structure, reporting paths, and the flow of authority between executive management, the RSC (for Type A broad scope), and the RSO (For Type A and Type B broad scope).</p> | <p></p> |


| Item No. | Suggested Response | Description Attached |
|----------|--|----------------------------------|
| 7. | <p>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE (Cont'd)</p> <p>Radiation Safety Committee</p> <p>Applicants for a Type A broad scope license should submit the following:</p> <ul style="list-style-type: none"> • description of the duties and responsibilities of the RSC • criteria used for selecting members of the RSC, including what members and the number of members constituting a quorum. Members should be indicated by position title rather than by name • criteria and procedure describing the approval process used by the RSC and RSO for authorizing new users and new uses <p>In addition, applicants for a Type A broad scope license that request the flexibility to make some program changes and revise some procedures previously approved by the NRC without amendment of the license should submit the following:</p> <ul style="list-style-type: none"> • a description of the duties and responsibilities of the RSC, including: <ul style="list-style-type: none"> – review and approval of permitted program and procedural changes prior to implementation – implementation of program and procedural changes – audit of licensed operations to determine compliance – the appropriate actions taken when noncompliance is identified, including analysis of the cause, corrective actions, and actions to prevent recurrence • a description of the process for procedure and program review and approval, including documentation of the specific change. (At a minimum, documentation should state the reason for the change and summarize the radiation safety matters that were considered prior to approval of the change.) | <p>[]</p> <p>[]</p> <p>[]</p> |

| Item No. | Suggested Response | Description Attached |
|----------|---|--|
| 7. | <p>INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE (Cont'd)</p> <p>Radiation Safety Officer</p> <p>For Type A, Type B, and Type C applicants:</p> <ul style="list-style-type: none"> • Submit the name of the proposed RSO. • Describe the training for the proposed RSO that demonstrates the individual is qualified to perform the duties required under the license. • Address the RSO's experience in performing each of the duties listed in the "Duties and Responsibilities" section in section 8.7.3, "Radiation Safety Officer," when and where the experience was gained, and the type, form, and quantity of radionuclides involved. • Submit a statement delineating the RSO's duties and responsibilities. • Submit a radiation safety officer delegation of authority memorandum signed by the licensee's executive management. <p>In addition, for Type B applicants:</p> <ul style="list-style-type: none"> • Submit the criteria used by the RSO to approve new users and uses of byproduct material. • Submit the criteria that the RSO will use to evaluate the radiation safety aspects of proposed uses, prior to approval. | <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> |

| Item No. | Suggested Response | Description Attached |
|----------|---|--|
| 8. | <p>TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS</p> <p>Submit a description of the radiation safety training program developed for each group of workers, including: topics covered, qualifications of the instructors, method of training, method for assessing the success of the training, and the frequency of training and refresher training. Alternately, identify the model training program described in the appropriate base NUREG corresponding to the particular type of licensed program and submit a statement that this training program will be implemented.</p> <p>In addition, Type A broad scope licensees or applicants that want the flexibility to revise their radiation safety training program without amendment of the license (as discussed in Chapter 1, "Purpose of Report," and Section 8.7.2, "Radiation Safety Committee," of NUREG-1556, Volume 11, Revision 1) should describe the process that will be used to revise and implement the submitted training programs.</p> | <p>[]</p> <p>[]</p> |
| 9. | <p>FACILITIES AND EQUIPMENT</p> <p>Describe the criteria the RSC or RSO, as appropriate, will use to review and approve facilities and equipment (research laboratories, iodination facilities, waste storage facilities, survey and counting equipment, etc.). The description will need to include the method of classifying laboratories based on type, toxicity, and quantity of byproduct material being requested. Sample diagrams should be provided for each classification scheme that take into consideration shielding, the proximity of radiation sources to unrestricted areas, and other items related to radiation safety. When reviewing facilities where radioactive materials may become airborne, sample diagrams should take into consideration descriptions of the ventilation systems—including pertinent airflow rates, pressures, filtration equipment, and monitoring systems. For facilities and equipment used in special applications such as those described in Section 8.9 of NUREG-1556, Volume 11, Revision 1, the application will include their locations, (i.e., buildings and room numbers) and special considerations that the RSC or RSO (or both) will use in authorizing byproduct material use. Also, describe the procedures for control, review, and approval of significant facilities or equipment modifications.</p> |  |


| Item No. | Suggested Response | Description Attached |
|----------|--|----------------------|
| 10. | <p>RADIATION SAFETY PROGRAM</p> <p>Audit and Review of Program</p> <p>Describe the mechanisms executive management uses to ensure adequate oversight of the program. In addition, if a licensee is upgrading its limited scope license to a Type A broad scope license or renewing its Type A broad scope license, describe the RSC's involvement in these oversight mechanisms.</p> <p>Describe the audit mechanism implemented by the RSO or other responsible individual to determine user compliance with NRC regulations, the terms and conditions of the NRC license, the requirements of the RSC- or RSO-approved permits (as appropriate), and good health physics practices.</p> <p>The applicant is not required to, and should not, submit its program for conducting the annual audit required by 10 CFR 20.1101, "Radiation protection programs," to the NRC for review as part of a license application. The NRC will review this audit program during inspection.</p> <p>In addition, Type A broad scope licensees or applicants that want the flexibility to revise the audit mechanism implemented by the RSO without amendment of the license, as discussed in Chapter 1, "Purpose of Report," and Section 8.7.2, "Radiation Safety Committee," of NUREG-1556, Volume 11, Revision 1, should describe the process they will use to revise and implement their audit program.</p> | [] |

| Item No. | Suggested Response | Description Attached |
|----------|---|-----------------------|
| 10. | <p>RADIATION SAFETY PROGRAM (Cont'd)</p> <p>Radiation Monitoring Instruments</p> <p>Provide the criteria used by the RSC or RSO (or both), as appropriate, to review and approve radiation monitoring instrumentation to ensure that appropriate radiation monitoring equipment will be used during licensed activities.</p> <p>Discuss how the RSC or RSO, as appropriate, will ensure that instruments are properly calibrated at prescribed frequencies.</p> <p>Submit procedures for instrument calibration or state that instruments will be calibrated by a vendor licensed by the NRC or an Agreement State to perform instrument calibrations. Licensees that want authorization to calibrate their own survey instruments may commit to implementing the model procedures published in Appendix H of NUREG-1556, Volume 11, Revision 1.</p> <p>State the frequency at which instruments will be calibrated.</p> <p>In addition, Type A broad scope licensees or applicants that want the flexibility to revise their instrument specifications and procedure for calibration of instruments without amendment of the license, as discussed in Chapter 1, "Purpose of the Report," and Section 8.7.2, "Radiation Safety Committee," of NUREG-1556, Volume 11, Revision 1, should describe the process that will be used to revise and implement these submitted procedures.</p> | <p>[]</p> <p>[]</p> |

| Item No. | Suggested Response | Description Attached |
|----------|---|---|
| 10. | <p>RADIATION SAFETY PROGRAM (Cont'd)</p> <p>Material Receipt and Accountability</p> <p>Describe the administrative procedures to ensure control of procurement and use of byproduct material.</p> <p>While the applicant is required to develop and implement safe opening procedures for packages containing radioactive material, the applicant need not submit the procedures during the licensing process. The NRC will review activities subject to these procedures during inspection.</p> <p>Provide the following statement: "We will develop, implement and maintain procedures for ensuring accountability of licensed materials at all times."</p> <p>Describe the administrative controls and provisions related to materials control, accounting, and security. Describe the method for maintaining accountability of licensed material at all times.</p> <p>If applicable, provide the following statement: "We will comply with the National Source Tracking System (NSTS) reporting requirement as described in 10 CFR 20.2207."</p> <p>In addition, Type A broad scope licensees or applicants that want the flexibility to revise their administrative procedures concerning control of procurement and use of byproduct material without amendment of their license should describe the process that their radiation safety committee will use to revise these administrative procedures, controls, and provisions. Licensees and applicants should also do this when making revisions to their administrative controls and provisions related to material control, accounting, and security. The flexibility to revise these administrative procedures is discussed in Chapter 1, "Purpose of Report," and Section 8.7.2, "Radiation Safety Committee," of NUREG-1556, Volume 11, Revision 1.</p> |  |

| Item No. | Suggested Response | Description Attached |
|----------|---|-----------------------|
| 10. | <p>RADIATION SAFETY PROGRAM (Cont'd)</p> <p>Occupational Dose</p> <p>Provide one of the following statements:</p> <p>"We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502." ✓</p> <p style="text-align: center;">OR</p> <p>"We will monitor individuals in accordance with the criteria in the section titled, 'Radiation Safety Program—Occupational Dose' in NUREG-1556, Vol. 11, Revision 1, 'Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope.'"</p> <p style="text-align: center;">OR, IN LIEU OF THESE STATEMENTS,</p> <p>provide a description of an alternative method for demonstrating compliance with the referenced regulations.</p> <p>In addition, Type A broad scope licensees or applicants that want the flexibility to revise their personnel dosimetry program without amendment of the license, as discussed in Chapter 1, "Purpose of Report," and Section 8.7.2, "Radiation Safety Committee," of NUREG-1566, Volume 11, Revision 1, should describe the process they will use to revise and implement their submitted personnel dosimetry program.</p> <p>Public Dose</p> <p>No response is required from the applicant, but records and written materials documenting compliance will be examined during inspection. During NRC inspections, licensees must be able to demonstrate, by measurement or calculation, that the total effective dose equivalent to the individual likely to receive the highest dose from the licensed operation does not exceed the annual limit for members of the public.</p> | <p>[]</p> <p>[]</p> |

| Item No. | Suggested Response | Description Attached |
|----------|--|--|
| 10. | <p>RADIATION SAFETY PROGRAM (Cont'd)</p> <p>Safe Use of Radionuclides and Emergency Procedures</p> <p>Submit the procedures for safe use of radionuclides and emergencies. Submissions should include procedures for maintaining security of licensed radioactive materials. As an alternative, the applicant or licensee may state that, "We will adopt the procedures for the safe use of radionuclides and emergencies as published in Appendix K of NUREG-1556, Volume 11, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope.""</p> <p>In addition, Type A broad scope licensees or those applying for a Type A broad scope license that want the flexibility to revise their safe use and emergency procedures without amendment of the license, as described in Chapter 1, "Purpose of Report," and Section 8.7.2, "Radiation Safety Committee," of NUREG-1556, Volume 11, Revision 1, should discuss the process that will be used to revise and implement their submitted safe use and emergency procedures.</p> <p>Surveys</p> <p>Submit procedures to evaluate radiological hazards, both external and internal. As an alternative, the applicant may state, "We will survey our facility and maintain contamination levels and perform bioassays of occupationally exposed workers in accordance with the survey frequencies and contamination levels published in Appendix L of NUREG-1556, Volume 11, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope.""</p> <p>Leak Testing</p> <p>Submit leak test procedures. As an alternative, the applicant may state, "We will implement the model leak test program published in Appendix M of NUREG-1556, Volume 11, Revision 1, "Consolidated Guidance About Materials Licenses: Program-Specific Guidance About Licenses of Broad Scope.""</p> <p>In addition, Type A broad scope licensees or those applying for a Type A broad scope license that want the flexibility to revise their survey or leak test program without amendment of the license, as described in Chapter 1, "Purpose of Report," and Section 8.7.2, "Radiation Safety Committee," of NUREG-1556, Volume 11, Revision 1, should discuss the process that will be used to revise and implement their submitted survey and leak test program.</p> | <p><input checked="" type="checkbox"/></p> <p>[]</p> <p>[]</p> <p>[]</p> <p>[]</p> |

| Item No. | Suggested Response | Description Attached |
|----------|---|---|
| 10. | RADIATION SAFETY PROGRAM (Cont'd) Transportation No response is needed from applicants during the licensing phase. Compliance with transportation requirements will be reviewed during NRC inspections. | |
| | Security Program for Category 1 and Category 2 Material No response is required from an applicant or licensee. Compliance with access authorization and security program requirements may be reviewed during NRC inspections. | |
| 11. | WASTE MANAGEMENT Provide procedures for waste collection, storage, and the disposal by any of the authorized methods described in this section. Applicants should contact the appropriate regional office of the NRC for guidance to obtain approval of any method(s) of waste disposal other than those discussed in this section. |  |

Supplemental Information for Renewal Materials License # 04-23970-01E

Item # 5 Radioactive Material

- a. **Element & Mass Number:** Krypton 85 (Kr 85)
- b. **Chemical and/or Physical Form:** Gas
- c. **Maximum amount that will be possessed at any one time:**

Epson sells projectors that contain sealed source electron tubes (lamps) that contain a very small quantity of Krypton 85.

Two lamp manufacturers supply Epson with all of our KR 85 containing lamps.

The manufacturers are:

Matsushita Electric Industries Company LTD
Iwasaki Electric Company LTD

Lamps are installed in projectors at Epson's factories (as finished goods), boxed and sold by Epson to our retailers, distributors and the consumer. Additionally, replacement lamps are sold individually also as finished goods.

The list of projector models sold with the factory installed lamp along with the corresponding replacement lamp model number can be found on the separate, attached sheet.

The products and replacement lamps listed can come from either of the above two manufacturers.

The amount of KR 85 is less than or equal to 0.02700 micro Ci for all products and lamps listed above.

We are unable to determine the exact mix of products we will be distributing at any given time. Given that the amount of KR 85 in these products is very, very low we would provide the following estimate of on-hand amounts at any given time:

Epson America, Inc.
3840 Kilroy Airport Way
Long Beach, CA 90806-2452

TOTAL Lamps on-hand (including those installed in projectors) 10,000 units

If ALL lamps contained 0.02700 micro Ci or less, the on-hand amount of KR 85 would be 270 micro Ci or 0.27 millicurie or 0.00027 curie.

The above figures would represent the maximum concentration amounts of KR 85 held on-hand in 10,000 units (lamps/projectors) at any given time for distribution.

Therefore we request 10,000 lamp/projector units not to exceed 0.02700 micro Ci each, total not to exceed 0.00027 curies

Item # 6 Purpose(s) for Which Licensed Material Will be Used

Sealed source electron tubes (lamps) containing KR 85 by-product material for illumination purposes as part of finished goods (projector) or as a replacement lamp for distribution to persons exempt from licensing.

Item # 7 Individuals Responsible for Radiation Safety Programs & Their Training & Experience

Ron Mateas, Corporate Manager, Environmental Programs is the designated Radiation Safety Officer (RSO). Given the limited exposure potential and quantity of KR-85, training and experience is being fulfilled by past Military Service.

Ron Mateas has over 20 years of Military service in the United States Coast Guard. During this time, it was necessary for Ron to complete many required training sessions covering nuclear, biological and chemical warfare. Additionally, Ron participated in many compliance inspections on foreign vessels (ships) where the use of radioactive materials detecting devices (Geiger-counter) were used. Finally, as part of Ron's advancement criteria with the U.S. Coast Guard, nuclear, biological and chemical warfare and protection was an integral part of his advancement course of study and testing.

Finally, Ron has been the designated RSO since 2008. During this time, our facility has undergone numerous inspections by the Federal NRC as well as the State of California (conducted by L.A. County Department of Health Services) with **NO** violations noted.

There is a very small quantity of Krypton 85 material in sealed source electron tubes (lamps). The lamps are finished goods and as such are packaged for final distribution to our retailers, distributors and consumers. It is virtually impossible to release the KR-85, however, even if such were to occur, the KR-85 (which is in gas form) would immediately dissipate into the atmosphere with little or no expose to personnel.

Epson America, Inc.
3840 Kilroy Airport Way
Long Beach, CA 90806-2452

Since products are received into our distribution center as finished goods, there are no individual users (we receive and distribute only). The products are stored until ready for re-distribution. No distribution personnel come into direct contact with the KR-85 material.

N/A: Item #8 Training for Individuals Working in or Frequenting Restricted Areas

There is a very small quantity of Krypton 85 material in sealed source electron tubes (lamps). The lamps are finished goods and as such are packaged for final distribution to our retailers, distributors and consumers. It is virtually impossible to release the KR-85, however, even if such were to occur, the KR-85 (which is in gas form) would immediately dissipate into the atmosphere with little or no expose to personnel.

Since products are received into our distribution center as finished goods, there are no individual users (we receive and distribute only). The products are stored until ready for re-distribution. No distribution personnel come into direct contact with the KR-85 material, however, KR-85 training of personnel and audits of the facility are conducted on a regular basis.

Item #9 Facilities and Equipment

The warehouse facility is a modern, well-maintained facility that has current life safety and security features such as fire sprinkler systems, closed circuit television cameras and 24-hour on-site security personnel.

The warehouse facility is C-TPAT certified as well as ISO 9001 (quality) and ISO 14001 (environmental) certified.

The facility maintains a current emergency response plan and all employees are trained on an annual basis. This includes emergency training for the handling of KR-85 products.

The warehouse is unmarked (no Epson name on building) to ensure added security from break-in and theft.

Item #10 Radiation Safety Program

Material Receipt and Accountability

Epson America, Inc. operates a state of the art, fully functional and staffed warehouse facility. We receive, store and distribute millions of dollars of merchandise at this facility every year. There are current processes in place to ensure material accountability and inventory accuracy.

Epson America, Inc.
3840 Kilroy Airport Way
Long Beach, CA 90806-2452

Occupational Dose

“We will maintain, for inspection by the NRC, documentation demonstrating that unmonitored individuals are not likely to receive a radiation dose in excess of the limits in 10 CFR 20.1502”

Safe Use of Radionuclide and Emergency Procedures

The facility maintains and active emergency response team along with current, updated emergency response plan. All employees are trained on an annual basis in emergency response procedures.

Item #11 Waste Management

This is not applicable to our situation. In the unlikely event that KR-85 material is release (it is a gas), it will immediately dissipate into the atmosphere leaving no waste to manage or dispose of.

Epson America, Inc. License Renewal - 04-23970-01E - 2018

| LAMP NUMBER | PROJECTOR MODEL |
|--------------------|---|
| ELPLP77 | 4550/4650/G5910/1970W/1975W/4750W/4770W/650KG/750KG 1980WU/1985WU/4850WU/4855WU/4950WU/4955WU/HC 1440 |
| ELPLP67 | S01/S02/S02H/S11/S11H/S12/S12H/S12+/S100/S110 X02/X11/X11H/X12/X14/X14G/X14H/X14+/X15 X100/W01/W02/W11+/W12/W12+/W110/1221/1261W C05S/C10SE/C15S/C20X/C25XE/C26SH/C26XE/C28SH/C30X/C30XE C30XH/C35X/C40X/C45W/C50W/C55W/C215S/C240X/C340X EX3210/EX3212/EX5210/EX6210/EX7210 VS210/VS220/VS310/VS315W/VS320/VS325W TW400/TW480/TW470C/TW490C/ HC 500/HC 707/HC 710HD |
| ELPLP66 | MM 85HD |
| ELPLP65 | 1750/1750G/1751/1760W*/1761W*/ 1770W/1771W/1775W/1776W C260M/C260MN*/C261M/C261MN*/ C300MN/C300MS/C301MS C301MN/C3000X/C3001X/C3005WN*/C3010WN/X3011WN |
| ELPLP64 | D6155W/D6250/1840W/1850W/1860/ 1870/1880/935W/VS350W/VS410 C1030WN/C1040XN/C700W/C705W/ C710X/C713X/C715X/C720XN |
| ELPLP61 | 910W/915W/925/D6150/1835 C1020XN/C2050WN/C2070WN/C2080XN/C2100XN 430/431i/435W/435We/436Wi/436WT CS510Xi/CS510XN/CS520Wi/CS520WN |
| ELPLP60 | 92/93/93e/93H/93+/95/96W/900/905 C1000X/C1010X/C2000X/C2010X/C2010XH C2020XN/C2030WN/C2040XN/C2060XN 420/421i/425W/425We/426Wi/426WT CS500Xi/CS500XN/CS500Wi/CS500WN |
| ELPLP59 | R1000/R2000/R4000/R3000C/R5000C HC 21000/PC 31000/PC 61000 |
| ELPLP58 | S9/S92*/X9/X92*/W9/S10/S10+/X10/X10+/W10/W10+ 1220/1260/VS200*/EX3200/EX5200/EX7200 C250S/C250X/C250W/C250XC/C250XS C260S/C260X/C260XS/C260W |
| ELPLP57 | 440W/450Wi/450WT/450W/450We/460i/460T 460/460e/455Wi/455Wi+/455WT/465i/465T |

| | |
|---------|---|
| ELPLP56 | DM3/MM 60/MM 62/Presenter L |
| ELPLP55 | W8D/DM30/DM30HD/Presenter/PresenterHD |
| ELPLP54 | 79/S7*/S72*/X7*/X72*/W7*/S8/S82/X8/X8e/W8 EX31/EX51/EX71/TW450/HC 705HD |
| ELPLP53 | 1830/1900/1910/1913/1915/1920W/1925W/VS400 C730X/C735W/C1050X/C1830/C1900/C1910/C1915 C1920W/C1925W/C2090X |
| ELPLP50 | 84/84e/84H/84He/84+/84L/85/85H/85+ 824/824H/825/825H/826W/826WH/D290/EX91 |
| ELPLP49 | TW2800/TW2900/TW3000/TW3200/TW3500/TW3600/TW3800 TW4000/TW4400/TW4500/ TW5000/TW5500/TW5800 HC 6100/HC 6500UB/HC 8100/HC 8345/ HC 8350/HC 8500UB/HC 8700UB PC 7100/PC 7500UB/PC 9100/ PC 9350/PC 9500UB/PC 9700UB TW3300C/TW3700C/TW3850C/TW5850C |
| ELPLP48 | 1716/1720/1723/1724/1725/1730W/1735W |
| ELPLP44 | DM1/DM2/MM 50/MM 55 |
| ELPLP43 | TW10/W5D/MM 72 |

Org Chart: Keith Kratzberg



Keith Kratzberg
PRESIDENT &
C.E.O. (10000001)
11/2401



Agustin Chacon Laya
VP, Industrial Prod. Web Mgt.
(10000167)
6/94



Andrea Zoeckler
Chief Op Officer and
CEO (10000281)
7/1266



Daniel Murphy
DIR. MKTG
COMMUNICATION
(10000099)
3/95



Hiromu Koyama
SEC. Expat/Vice
President
(10000002)
14/150



Kendra Jones
VP LEGAL AFFAIR
& GEN CO
(10000126)
10/10



Mark Mathews
VP COMMERCIAL
MKTG (10000294)
4/116



Michael Isgrig
VP CONSUMER
SLS & MKTG
(10000189)
6/72



Michele Hoff
VP HUMAN
RESOURCES
(10000206)
16/71



Paula Stewart
Exec Administrative
Asst (10000686)
7/360



Paulo Ferraz
VP LATIN AM
SALES (10000239)
5/156



Thomas Verselt
VP COMMERCIAL
SALES (10000209)
5/156

July 28, 2008

Ms. Shirley Xu
U.S. Nuclear Regulatory Commission
NRC/FSME/MSSA/SAIS
Mail Stop T8E24, Room T818
Washington, D.C.

Re: New Materials License/Exempt Distribution License, Epson America, Inc.
Control Number 022702

Dear Ms. Xu:

Please accept this letter as our notice to the U.S. Nuclear Regulatory Commission that Ron Mateas, Manager of Environmental Programs for Epson America, Inc. has full decision making authority for all issues relating to our application for a *New Radioactive Materials License/Exempt Distribution License*.

Sincerely,



Alan Pound
Senior Vice President, CFO