



**1000 W Mississippi Ave
Denver, CO 80223**

October 1, 2019

Mr. Don Lowman
US Nuclear Regulatory Commission
Materials Safety and Tribal Liaison Branch
Office of Material Safety and Safeguards
PH: (301) 415-5452

Mr. Lowman:

Regarding your request for additional information in the email dated September 10, 2019, our response is as follows:

- 1) The activity of Kr85 in the lamps is 1 millirad per hour.
- 2) The manufacturer can calculate activity of Kr85 per lamp in which the measuring unit used is Bq. The dose rate can be calculated based on the activity, but the manufacturer does not have equipment to measure directly on lamp.
- 3) There is no halogen in these lamps. The manufacturer erroneously included this in the supporting documents. However, halogen would have no effect on the lamps as it is a function of the arc tube.
- 4) Below is an estimate as to how many lamps could be distributed annually. The annual reports to be subsequently submitted will account for the actual number. However, the maximum units expected to be sold are as follows:

Item ID	Maximum Units to be Warehoused		nCi
	Product Containing Kr-85	Total Units	
ICS1203	ION CMH 315W Sys 120/208/240V 3100K	700	1.51
ICS1204	ION CMH 315W Sys 120/208/240V 4200K	400	1.51
OC3130	OE 315W CMH Lamp 3100K	400	1.51
OC4130	OE 315W CMH Lamp 4200K	400	1.51
OM4140	OE 400W MH Lamp 4200K	400	108
OM4160	OE 600W MH Lamp 4200K	500	136
OM4199	OE 1000W MH Lamp 4200K	900	191.70

Sincerely,


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