

APPLICATION FOR MATERIAL LICENSE

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.

FEDERAL AGENCIES FILE APPLICATIONS WITH:

U.S. NUCLEAR REGULATORY COMMISSION
DIVISION OF FUEL CYCLE AND MATERIAL SAFETY, NMSS
WASHINGTON, DC 20555

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS, IF YOU ARE LOCATED IN:

CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, MAINE, MARYLAND, MASSACHUSETTS, NEW JERSEY, NEW YORK, PENNSYLVANIA, RHODE ISLAND, OR VERMONT, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION I
NUCLEAR MATERIAL SECTION B
631 PARK AVENUE
KING OF PRUSSIA, PA 19406

ALABAMA, FLORIDA, GEORGIA, KENTUCKY, MISSISSIPPI, NORTH CAROLINA, PUERTO RICO, SOUTH CAROLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION II
MATERIAL RADIATION PROTECTION SECTION
101 MARIETTA STREET, SUITE 2900
ATLANTA, GA 30323

IF YOU ARE LOCATED IN:

ILLINOIS, INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION III
MATERIALS LICENSING SECTION
799 ROOSEVELT ROAD
GLEN ELLYN, IL 60137

ARKANSAS, COLORADO, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA, NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYOMING, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
MATERIAL RADIATION PROTECTION SECTION
611 RYAN PLAZA DRIVE, SUITE 1000
ARLINGTON, TX 76011

ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVADA, OREGON, WASHINGTON, AND U.S. TERRITORIES AND POSSESSIONS IN THE PACIFIC, SEND APPLICATIONS TO:

U.S. NUCLEAR REGULATORY COMMISSION, REGION V
MATERIAL RADIATION PROTECTION SECTION
1450 MARIA LANE, SUITE 210
WALNUT CREEK, CA 94596

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 JURISDICTION.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- ☐ A. NEW LICENSE
☒ B. AMENDMENT TO LICENSE NUMBER 37-03572-06
☐ C. RENEWAL OF LICENSE NUMBER

2. NAME AND MAILING ADDRESS OF APPLICANT (Include Zip Code)

Hamilton Watch Company, Inc.
941 Wheatland Avenue
Lancaster, PA 17604

3. ADDRESS(ES) WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED.

Hamilton Watch Company, Inc.
941 Wheatland Avenue
Lancaster, PA 17604

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Thomas E. Deitzler, Jr.

TELEPHONE NUMBER

(717) 394-7161(X 2133)

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 AND EXPERIENCE.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS.

9. FACILITIES AND EQUIPMENT

8507150460 850710
REG1 LIC30
37-03572-02E PDR

10. RADIATION SAFETY PROGRAM.

11. WASTE

12. LICENSEE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY 1-J AMOUNT ENCLOSED \$ 60.00

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, 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.

SIGNATURE—CERTIFYING OFFICER

Thomas E. Deitzler, Jr.

TYPED/PRINTED NAME

Thomas E. Deitzler, Jr.

TITLE

Dir. of Factory Operations

DATE

4/10/85

14. VOLUNTARY ECONOMIC DATA

a. ANNUAL RECEIPTS

<\$250K	\$1M-3.5M
\$250K-500K	\$3.5M-7M
\$500K-750K	\$7M-10M
\$750K-1M	>\$10M

b. NUMBER OF EMPLOYEES (Total for entire facility excluding outside contractors)

c. NUMBER OF BEDS

d. WOULD YOU BE WILLING TO FURNISH COST INFORMATION (Dollar and/or staff hours) ON THE ECONOMIC IMPACT OF CURRENT NRC REGULATIONS OR ANY FUTURE PROPOSED NRC REGULATIONS THAT MAY AFFECT YOU? (NRC regulations permit it to protect confidential commercial or financial—proprietary—information furnished to the agency in confidence)

☐ YES

☐ NO

FOR NRC USE ONLY

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

APR 15 1985

U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Application for Material License

Amendment to Lic. No. - 37-03572-06

Item 5 - Radioactive Material

a.) <u>Element and</u> <u>Mass Number</u>	b.) <u>Chemical and/or</u> <u>Physical Form</u>	c.) <u>Maximum amount</u> <u>which will be</u> <u>possessed at any</u> <u>one time</u>
A. Hydrogen 3	A. Radium Chemic PS362 and/or Brandhurst Company, Ltd. Triluco Tritiated Luminous Paint	A. Unspecified
B. Promethium 147	B. W. Maier Promethium Oxalate Luminous Paint	B. Unspecified

Item 6 - Purpose(s) for which Licensed Material will be used

- A. Distribution of time pieces, hands, and dials to which Radium Chemic PS362 and/or Brandhurst Company, Ltd., tritiated luminous paint have been applied to persons exempt from licensing pursuant to Section 30.15 (a), 10CFR Part 30.

- B. Distribution of timepieces, hands, and dials to which W. Maier promethium oxalate luminous paint has been applied to persons exempt from licensing pursuant to Section 30.15 (a), 10CFR Part 30.

Item 7 - Individual(s) responsible for Radiation Safety Program and their training and experience.

All licensed material shall be used by, or under the supervision of Daniel Fenwick, Thomas Deitzler, or Daniel Klein.

Daniel Fenwick - Trained by O. Barrelett whose background and education in field are listed on original application and amendments.

- On the Job Training
- Has been with Hamilton for 4 1/2 years as supervisor of After Sales Service. Serves as Safety Protection Officer. In this capacity monitors all equipment and personnel who handle modules and painted sources.
- Mr. Barrelett has directed us to send Dan to Harvard University for Nuclear Safety Training Course sometime in 1985.
- Watchmaking skills have been taught by Bulova personnel and an educational tour of Switzerland.

Thomas Deitzler - On the Job Training

- Has handled NRC communications since joining company in December of 1981 as the Plant Engineer. Has filed and amended licenses 37-03572-06 and 37-03572-8E since that time.
- Presently is Director of Factory Operations and reports directly to Vice President of Operations, Paul D. Karpouzis.
- Mr. D. Fenwick reports directly to me.
- Mr. D. Klein reports directly to me.

Daniel Klein - Trained by Mr. O. Barrelett

- On the Job Training
- Has over 10 years with the company as Supervisor of Assembly Operations. Has been trained in Switzerland by ETA personnel and is currently in charge of assembly of luminous products.

Item 8 - Training for individuals walking in or frequenting
restricted areas.

Individuals have been informed of enclosed memo from T. E. Deitzler dated October 14, 1982. This memo is posted on the bulletin board in the Assembly area for all personnel to view.

(See Attachment)

INTERNAL CORRESPONDENCE

TO: Tritium Room Operators

FROM: T. E. Deitzler

CC: N.R.C. File

DATE: October 14, 1982

SUBJECT: PROCEDURES & PRECAUTIONS FOR CONTAMINATION

The following is a fundamental procedure that is required by the N.R.C. This is a seemingly simple requirement, however, it must be rigidly and continuously adhered to by all workers.

Working conditions must be arranged to provide a generally safe environment for the workers and to encourage their cooperation in carrying out rules intended to preclude any known possibility of injury. The essential requirement is neat and orderly "housekeeping" which, under proper supervision, results in better working conditions, increased productivity, and safety for the individual worker. All workrooms inhabited by workers shall be equipped with proper ventilation and a Tritium monitor. In addition to this, the personnel shall be instructed about: 1) Instruction of handling the modules; 2) Effects of radiation; 3) Personal cleanliness.

Radionuclides can be taken into the body by a number of routes including ingestion or absorption through the skin. Extreme personal cleanliness and care are therefore needed. In work with sealed sources (which we do here at Hamilton), contamination will be a very minor problem, barring rupture of the container and dispersion of the source material. Hands shall be washed frequently, and shall be washed before eating, smoking, and at the end of each work period. No edibles of any kind--food, gum, candy, beverages--shall be brought into contaminated areas or areas that may become contaminated between radiation control surveys. Smoking shall be prohibited in such zones. Personnel should refrain from using personal items in the work area. Personnel shall keep their work area free from equipment and materials not needed for the immediate work. Orderliness is a prime requirement for eliminating the spread of contamination.

TED:kbm

Item 9 - Facilities and Equipment

There is no laboratory required to handle tritium paint in the assembly of watches.

Item 10 - Radiation Safety Program

A copy of Handbook 92, "Safe Handling of Radioactive Materials" is made available to the people working on watches containing tritium.

The license complies with the provisions of Title 10, Chapter 1, Code of Federal Regulations, Part 19, "Notices, Instructions and Reports to Workers, Inspections" and Part 20, "Standards for Protection Against Radiation".

Item 11 - Waste Management

There is no waste generated.

Docket No. 030-06106

Inquiry No. 85-01

Paragraph #5

All tritium painted dials have been placed in our digital repair area which is under lock twenty four hours a day and seven days per week. There is no authorization of traffic in and out of this area other than D. M. Fenwick. These dials and watches which are complete will remain housed in this area until we receive our updated license from the NRC offices. Amendment to license number 37-03572-06 will enable us to distribute these dials and hands and complete timepieces pursuant to paragraph four of your memo.

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MAR 22 1985

Docket No. 030-06106
Inquiry No. 85-01

License No. 37-03572-02E
Expiration Date: March 31, 1984

Hamilton Watch Company, Inc.
ATTN: Mr. Paul Karpousiz
Vice President of Operations
941 Wheatland Avenue
Lancaster, Pennsylvania 17604

Gentlemen:

Subject: NOTICE OF VIOLATION

This refers to the telephone discussion between Laurence F. Friedman, Ph.D., C.H.P., of this office and yourself on January 28, 1985. The subject of the discussion was the fact that NRC records show that the license identified above has expired and no renewal application has been filed in accordance with Section 30.37 of Title 10, Code of Federal Regulations, Part 30.

From this discussion we learned that you still possess material which requires a specific NRC license. Your possession of that material without a valid, specific license is a violation of Section 30.3 of 10 CFR Part 30. Section 30.3 states:

"Except for persons exempt as provided in this part and Part 150 of this chapter, no person shall manufacture, use, import, or export byproduct material, except as authorized in a specific or general license issued pursuant to the regulations in this chapter."

This Notice of Violation is sent to you under the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office a written statement or explanation in reply including: (1) corrective steps which have been taken by you, and (2) corrective steps which will be taken to avoid this happening in the future.

Since you plan to continue possession of radioactive material, your corrective steps must include prompt filing of an application. From the January 28, 1985, telephone conversation we understand that you plan to amend your License Number 37-03572-06 to include material currently covered under License Number 37-03572-02E. License Number 37-03572-02E can then be retired, since your distribution to persons exempt from licensing is currently covered under License Number 37-03572-08E. If our understanding is incorrect, please inform

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OFFICIAL RECORD COPY

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02/22/85

RETURN ORIGINAL TO
REGION I

12.07

MAR 22 1985

Hamilton Watch Company, Inc.

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this office immediately. You must determine if your program is subject to a license fee as required by Section 170.31 of 10 CFR Part 170 and, if one is required, submit the appropriate fee along with the application. Copies of appropriate application forms and guides are enclosed for your use.

Also, you must immediately place the radioactive material on hand covered by this license in secure storage until such time as you acquire a valid license. No other use of the material on hand or purchase of additional material is authorized. Include a statement in your reply to this Notice of Violation confirming that you have taken this action and describing the controls that will be exercised over the stored material until such time that you obtain a valid license.

You are required to reply to this Notice within 30 days of the date above. Address your reply to Region I, U. S. Nuclear Regulatory Commission, Attention: Chief, Nuclear Materials Safety Section B, 631 Park Avenue, King of Prussia, Pennsylvania 19406.

In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and your reply will be placed in the Public Document Room.

The responses directed in this Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We request that you give prompt attention to these matters. Should you have any questions regarding them, we would be pleased to discuss them with you.

Sincerely,

Original Signed By:

John E. Glenn

John E. Glenn, Ph.D., Chief
Nuclear Materials Safety Section B
Division of Radiation Safety
and Safeguards

Enclosures:

1. NRC Form 313
2. 10 CFR Parts 2, 19, 20, 30, and 170
3. Regulatory Guide 10.7

MAR 22 1985

Hamilton Watch Company, Inc.

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cc:

Public Document Room (PDR)

Nuclear Safety Information Center (NSIC)

Commonwealth of Pennsylvania

bcc:

Region I Docket Room (w/concurrences)

RI:DRSS *L.H.*

Friedman/cop

3/20/85

RI:DRSS

Glenn

2/22/85

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