

**HAMILTON WATCH CO., INC.**

LANCASTER, PENNSYLVANIA 17604, U.S.A. (717)394-7181

November 8, 1982



Mr. James W. Patterson
Material Licensing Branch
Division of Fuel Cycle & Material Safety
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Sir:

Ref: Your Letter Dated October 7, 1982, License No.
37-03572-06

In reference to your letter dated October 7, 1982, please
find below the appropriate answers to your questions.

Question 1 - Certification

My signature is on the application as of today (10/11/82).

Question 2 - Licensed Material Use

Hamilton has not purchased any modules since 1979. At the
present time, we are in a phase-out program with our
digital watches. We no longer assemble new watches for the
market, however, we are still repairing (replacement
program) the digitals. This phase-out program should be
completed by the end of November 1983.

At the time of our completion of the replacement program,
we have contacted the following company to remove our
by-product material and radioactive waste:

Chem-Nuclear Systems, Inc.
240 Stoneridge Drive - Suite 100
Columbia, SC 29210
Attn: Mr. Greg Garlach
(803) 256-0450

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REG1 LIC30
37-03572-06 PDR

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Mr. James W. Patterson
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The following is a list of modules that we have in our possession. At no time during our program should we store any more than we report at this time. Our replacement program is on a one-for-one (1:1) basis. The modules are broken out for you as good and defective. Our defective modules are stored, individually contained in movement cases, in a sealed drum. This drum is located in our tritium room to be monitored for any leaks.

TLQ Modules in Stock

<u>Model Numbers</u>	<u>Good</u>	<u>Bad</u>	<u>Total</u>
TLQ I, II, III W	1	461	462
TLQ I, II, III Y	14	444	458
TLQ XI W	905	104	1,009
TLQ XI Y	1,071	281	1,352
TLQ XII Y	762	64	826
TLQ XII W	108	26	134
TLQ Alarm	8	169	177
Totals	2,869	1,549	4,418

The total module figure will never exceed the above number of 4,418. No single source will contain more than 100mCi/3m.

$4,418 \times 100\text{mCi}/3\text{m} = 441,800\text{mCi}/3\text{m}$ will be our maximum activity over the next year.

Question 3 - Instructions to Personnel

The individuals working in our TLQ area had been through the courses offered by Mr. O. Barrelet. Also, a memo to those employees who work in the tritium room is enclosed.

We hope we have answered these questions to your satisfaction. Please call me if there are any questions at (717) 394-7161, Ext. 198.

Sincerely,

Thomas E. Deitzler, Jr.

Thomas E. Deitzler, Jr.
Mgr. - Industrial Engineering

TED:kbm

Enclosure

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