

File Copy

MATERIALS LICENSE

LES MUST DE CARTIER INTERNATIONAL, INC.  
550 Biltmore Way, PH1  
Coral Gables, Florida 33134

License No. 09-23847-01E  
Docket No. 030-34457

Pursuant to the Atomic Energy Act of 1954, as amended; the Energy Reorganization Act of 1974, as amended (Public Law 93-438); 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"; Section 32.14, 10 CFR Part 32, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material"; application dated May 1, 1997; and letters dated May 28, and June 9, 1997; a license is hereby issued to Les Must De Cartier International, Inc., to distribute timepieces, hands, and dials to which Radium-Chemie PS 362 tritiated luminous paint has been applied to persons exempt from licensing pursuant to Section 30.15 of 10 CFR Part 30, or equivalent provisions of the regulations of any Agreement State.

This license shall be deemed to contain the conditions specified in Section 183 of the Atomic Energy Act of 1954, as amended, and other applicable rules, regulations, and orders of the U.S. Nuclear Regulatory Commission now or hereafter in effect, and to the following conditions:

1. Each lot of timepieces, hands and dials containing tritium must be accompanied by a certificate which attests to the criteria found in 10 CFR 32.14.

A certificate will be considered acceptable if it states: 1) that the timepieces have been manufactured in accordance with the International Atomic Energy Agency standards; and 2) that the timepieces do not contain more than the maximum quantity authorized by US NRC regulations.

2. This license does not authorize possession or use of licensed material.
3. The licensee is authorized to distribute only from its facility located at 2335 NW 107th Avenue, Miami, Florida.



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PDR ADOCK 03034457  
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ML00  
to  
Send copy  
Region II

License No. 09-23847-01E  
Docket No. 030-34457

4. The licensee shall submit periodic material transfer reports as specified in Section 32.16 of 10 CFR Part 32.

This license shall expire on June 30, 2007.

FOR THE U.S. NUCLEAR REGULATORY COMMISSION

*[Signature]*  
6/19/97

*[Signature]*  
6/19/97

DATE: JUN 19 1997

BY: ORIGINAL SIGNED BY:  
J. Bruce Carrico  
Medical, Academic, and Commercial  
Use Safety Branch  
Division of Industrial and  
Medical Nuclear Safety  
Office of Nuclear Material Safety  
and Safeguards  
Washington, DC 20555

JUN 24 1997

Les Must De Cartier International, Inc.  
ATTN: Annie Paray  
Vice President, Finance & Operations  
550 Biltmore Way, PH1  
Coral Gables, Florida 33134

Dear Ms. Paray:

Enclosed is NRC License No. 09-23847-01E.

Please review the enclosed document carefully and be sure that you understand all the conditions. If there are any errors or questions, please contact me so that appropriate corrections and answers can be provided.

Please note that we are returning, under separate cover, documents that will not be part of your license file, but were helpful in reaching a decision in the issuance of your license. These documents are: All enclosures to your letter dated May 7, 1997. In addition, the letter from Covington & Burling dated June 13, 1997, sought clarification on the distribution of bezels as well as hands and dials. Our preliminary review of this matter would indicate that only timepieces, hands and dials are considered in 10 CFR 30.15(a)(1) for exempt distribution. A further review of this matter would require a referral to our Office of General Counsel (OGC). If you still desire to pursue this matter, you may request a further review at a later date.

Please be advised that you must conduct your program involving radioactive materials in accordance with the conditions specified in your NRC license, representations made in your license application, and other rules, regulations, and orders of the U.S. Nuclear Regulatory Commission, now or hereafter in effect, to include the following:

1. Comply with applicable NRC regulations in 10 CFR Part 30, "Rules of General Applicability to Domestic Licensing of Byproduct Material"; 10 CFR Part 32, "Specific Domestic Licenses to Manufacture or Transfer Certain Items Containing Byproduct Material"; and other applicable regulations.

NOTE: Licensees authorized to distribute or initially transfer products containing byproduct material must also possess a valid possession license issued either by NRC or an Agreement State(s) which authorizes possession and use of byproduct material.

2. Distribute only those products containing radioactive material which are specifically authorized in your license.
3. Notify NRC in writing within 30 days of any change in mailing address (no fee is required if the location of radioactive material remains the same).

A. Paray

- 2 -

4. Request and obtain appropriate amendments if you plan to change control or ownership of your organization, change locations of distribution of products containing radioactive material, or make any other changes in your program which are contrary to the license conditions or representations made in your license application and any supplemental correspondence with NRC. A license fee may be charged for the amendments if you are not in a fee-exempt category.
5. Submit a complete renewal application (with proper fee) or termination request (no fee required) at least 30 days before the expiration date on your license. You should receive a reminder notice approximately 90 days before the expiration date. Continued distribution of products containing radioactive material after your license expires is a violation of NRC regulations.
6. In accordance with 10 CFR 30.36, request termination of your license if you plan to permanently discontinue activities involving distribution of products containing radioactive material.

You will be periodically inspected by NRC. Failure to conduct your program in compliance with NRC regulations, license conditions, and representations made in your license application and supplemental correspondence with NRC may result in enforcement action(s) against you. This could include issuance of a notice of violation; proposed imposition of a civil penalty; or an order suspending, modifying, or revoking your license as specified in the "General Statement of Policy and Procedures for NRC Enforcement Actions." (NUREG-1600).

If you have any questions, you may contact me at (301) 415-6140.

Sincerely,

Anthony S. Kirkwood

Commercial Use Safety Section

Medical, Academic, and Commercial

Use Safety Branch

Division of Industrial and

Medical Nuclear Safety

Office of Nuclear Material Safety  
and Safeguards

Original Signed By:

Anthony S. Kirkwood

Docket No. 030-34457

Enclosure: NRC License No. 09-23847-01E

cc: Gary A. Saage, Jr., Cartier, Incorporated

Richard A. Meserve, Esq., Covington & Burling

DISTRIBUTION:

License File 09-23847-01E

IMAB r/f

SBaggett

DOCUMENT NAME: G:LESMUST.ASK

C=COPY

E=COVER/ENCLOSURE

N=NO COPY

OFC	IMAB	N	IMAB	N								
NAME	ASKirkwood: ask	Da	JBCarrico	JK								
DATE	06/19/97		06/23/97									

OFFICIAL RECORD COPY

BETWEEN:

License Fee Management Branch, ARM  
and  
Regional Licensing Sections

(FOR LFMS USE)  
INFORMATION FROM LTS

Program Code: 03254 03251  
Status Code: 3  
Fee Category:  
Exp. Date: 0  
Fee Comments:  
Decom Fin Assur Req: -

LICENSE FEE TRANSMITTAL

A. REGION HQ

1. APPLICATION ATTACHED

Applicant/Licensee: LES MUST DE CARTIER INTERNATIONAL  
Received Date: 970508  
Docket No: 3034457  
Control No.: 21904  
License No.:  
Action Type: New License

2. FEE ATTACHED \$4400.00

Amount:  
Check No.: 2186

3. COMMENTS

Signed  
Date

M. Moriarty  
5/8/97

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered ☒)

1. Fee Category and Amount: 3I \$4400

2. Correct Fee Paid. Application may be processed for:

Amendment  
Renewal  
License ☒

3. OTHER

Signed  
Date

SA

Log	<u>May 1</u>
Remitter	<u>HPS</u>
Check No.	<u>2186</u>
Amount	<u>\$4400</u>
Fee Category	<u>3I</u>
Type	<u>APP</u>
Date Paid	<u>5/15/97</u>
Date Cleared	<u>5/15/97</u>
By	<u>SA</u>

1097 117-9 M 9:58



COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

TELEFAX: (202) 662-6291

WRITER'S DIRECT DIAL NUMBER

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 071-495-5655

TELEFAX: 071-495-3101

BRUSSELS CORRESPONDENT OFFICE

44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-549-5230

TELEFAX: 32-2-502-1598

June 13, 1997

By Facsimile and First-Class Mail

Mr. Anthony S. Kirkwood  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
2 White Flint North  
11545 Rockville Pike  
Rockville, Maryland 20852

Re: Materials License, No. 31-23847-01E

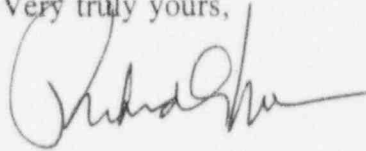
Dear Tony:

As we discussed, the above-referenced license permits Cartier, Incorporated ("Cartier") to distribute tritiated parts as well as timepieces. I understand that the license contemplates the exempt distribution of all the kinds of tritiated parts discussed in Cartier's submissions of February 21, 1997 and April 4, 1997. This would include bezels as well as the hands and dials explicitly mentioned on the face of the license. Since bezels usually contain less tritium than hands and dials, there would be no principled reason to exclude them.

For your information, Cartier generally distributes parts from its authorized distribution facility at 1235 Royal Lane, DFW Airport, Texas, to its primary repair facility at 1225 Royal Lane. From time to time, these parts are sent from the repair facility to smaller repair shops throughout the country.

Please call if you have any questions. Thank you again for your help.

Very truly yours,



Richard A. Meserve  
Attorney for Cartier, Incorporated

COVINGTON & BURLING

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P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

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WRITER'S DIRECT DIAL NUMBER

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 071-495-5655

TELEFAX: 071-495-3101

BRUSSELS CORRESPONDENT OFFICE

44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-549-5230

TELEFAX: 32-2-502-1598

June 9, 1997

By Facsimile and First-Class Mail

Mr. Anthony S. Kirkwood  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
2 White Flint North  
11545 Rockville Pike  
Rockville, Maryland 20852

Re: Certificate of License Compliance for Cartier, Incorporated and  
Les Must de Cartier International Inc.

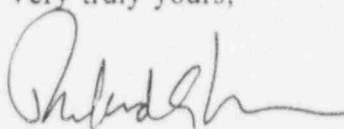
Dear Tony:

This letter is to inform you that Cartier, Incorporated ("Cartier") is using the attached Certificate of License Compliance. It fully complies with license condition 1 of Cartier's Materials License, No. 31-23847-01E. *Les Must de Cartier International Inc.* ("Cartier International"), which applied for a similar Exempt Distribution License on May 7, 1997, also intends to use this certificate.

The certificate that Cartier and Cartier International previously forwarded to you was originally designed for use by RC Tritec, the manufacturer of the tritiated paint, and is inappropriate for use by the importer of finished timepieces and parts. It includes information that is not required by Cartier's license, the provision of which would create an extreme administrative burden on affiliates and other vendors in Europe that Cartier cannot directly control. In addition, it omits other information, now added to the revised certificate, that would be useful in identifying a particular shipment.

Please call if you have any questions. Thank you again for your help.

Very truly yours,



Richard A. Meserve  
Attorney for Cartier, Incorporated

Attachment

## CERTIFICATE OF LICENSE COMPLIANCE

The undersigned, by its duly authorized representative, who is fully cognizant of the procedures used, does hereby state that:

- 1) The shipment made on . . . . . (date)  
from . . . . . (exporter)  
to . . . . . (importer)

contains the following timepieces or components:

- (a) . . . . . timepieces with RC TRITEC tritium luminous paint applied  
to the hands and dials;  
(b) . . . . . parts coated with RC TRITEC tritium luminous paint;

Invoice No. \_\_\_\_\_ Bill of Lading No. \_\_\_\_\_

- 2) The consignee of this shipment possesses a U.S. Nuclear Regulatory  
Commission  
License No. \_\_\_\_\_, Amendment No. \_\_\_\_\_ Valid until \_\_\_\_\_  
to distribute timepieces with tritium luminous paint applied to the hands and dials  
as required by Title 10, Part 30 and 32, U.S. Nuclear Regulatory Commission
- 3) The timepieces or components have been manufactured in accordance with  
the Standards of the European Nuclear Agency and International Atomic Energy  
Agency.
- 4) The amount of tritium applied to the timepieces or components is not in excess  
of the maximum permissible quantity authorized by NRC regulations; i.e., 925  
Megabecquerels per timepiece, 185 Megabecquerels per hand or 555  
Megabecquerels per dial.
- 5) The prototype tests on the above-mentioned luminous paint and quality  
control tests, both as per ENEA and IAEA Standards, have been successfully  
performed.

For and behalf  
(Name of Company)

(Authorized Officer)



COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

FACSIMILE: (202) 662-6291

RICHARD A. MESERVE

DIRECT DIAL NUMBER

(202) 662-5304

rmeserve@cov.com

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 44-(71)-495-5655

FACSIMILE: 44-(71)-495-3101

KUNSTLAAN 44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-549-5230

FACSIMILE: 32-2-502-1598

May 29, 1997

By Facsimile and First-Class Mail

Mr. Anthony S. Kirkwood  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
2 White Flint North  
Room 8J10 - Mail Stop T8F5  
11545 Rockville Pike  
Rockville, Maryland 20852-2738

Re: Application for Material License (Tritium)

Dear Tony:

As you know, on May 7, 1997, Les Must de Cartier International Inc. ("Cartier International") applied for an exempt distribution license to distribute tritiated timepieces and parts. Last week, I faxed you a copy of the possession license, issued by the Florida Bureau of Radiation Control on May 21, 1997, authorizing storage at the facility from which exempt distribution is to occur. I also noted that the license inadvertently contained a condition that no timepiece contain more than three millicuries of tritium and that an amendment was being sought. Attached is the requested amendment. It authorizes the storage of timepieces each containing up to 25 millicuries of tritium, the maximum allowed for exempt distribution by 10 C.F.R. § 30.15.

I understand that, with the filing earlier today of the letter you requested, Cartier International's application should now be complete. As we have discussed, prompt processing of the application would be greatly appreciated. Any delay in the receipt of the license will impose a significant financial penalty on Cartier International

Mr. Anthony S. Kirkwood  
May 29, 1997  
Page 2

and its dealers. I would also appreciate it if you would fax me a copy of the license as soon as it is available at 202-778-5304.

Please call if you have any questions. Thank you again for your help.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Richard A. Meserve', written in a cursive style.

Richard A. Meserve

Counsel for Les Must de Cartier  
International Inc.

Enclosure

STATE OF FLORIDA  
DEPARTMENT OF HEALTH  
BUREAU OF RADIATION CONTROL

RADIOACTIVE MATERIALS LICENSE  
SUPPLEMENTAL SHEET

LES MUST DE CARTIER INTERNATIONAL, INC.  
550 Biltmore Way, PH1  
Coral Gables, FL 33134

With reference to correspondence dated May 21, 1997, State of Florida Radioactive Materials License Number 2784-1 is hereby amended as follows:

TO CHANGE ITEMS 6, 7, 8 AND 9, SUBITEM A TO READ:

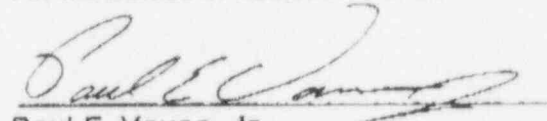
6. Radioactive material (element and mass number)	7. Chemical and/or physical form	8. Maximum quantity licensee may possess at any one time
A. Hydrogen 3	A. Tritium paint	A. 10 Curies; no single timepiece to exceed 25 millicuries each
C. AUTHORIZED USES:		

- A. To be possessed by the licensee as assembled timepieces for distribution as an exempt item, see conditions 14, 16, and 17 below.

MAY 29 1997

Issuance Date: \_\_\_\_\_

For the Bureau of Radiation Control



Paul E. Vause, Jr.  
Health Physicist Supervisor  
1317 Winewood Boulevard  
Tallahassee, FL 32391-0700  
(904) 487-2437

License Number: 2784-1  
Amendment No.: 1  
Control Number: 970324-0351

LICENSEE COPY

Page 1 of 1 Page(s)

Category: [3L(V)]

Expiration Date: 05/31/2002

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

FACSIMILE: (202) 662-6291

RICHARD A. MESERVE

DIRECT DIAL NUMBER

(202) 662-5204

rmeserve@cov.com

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 44-171-495-5655

FACSIMILE: 44-171-495-3101

KUNSTLAAN 44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-549-5230

FACSIMILE: 32-2-502-1598

May 28, 1997

BY HAND

Mr. Anthony S. Kirkwood  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
2 White Flint North  
Room 8J10 - Mail Stop T8F5  
11545 Rockville Pike  
Rockville, Maryland 20852-2738

Re: Les Must de Cartier International Inc.

Dear Mr. Kirkwood:

On May 7, 1997, Les Must de Cartier International Inc. ("Cartier International") applied for an Exempt Distribution license to distribute tritiated timepieces and parts. In response to your request of May 27, 1997, I am filing this letter with appendices as a supplement to the above-referenced application.

Cartier International is a distributor of luxury timepieces (watches and clocks) and their component parts. Some of the timepieces contain small amounts of luminous tritiated compounds, but all meet the requirements for exempt distribution. See 10 C.F.R. § 30.15.

Mr. Anthony S. Kirkwood  
May 28, 1997  
Page 2

### Summary

This section provides a summary of the information required by 10 C.F.R. § 32.14. The numbers correspond to those in Section 32.14(b):

(i) Chemical and physical form.

The tritium is bound in luminous compounds provided by RC-TRITEC Ltd. (registered NRC No. PS362) that are applied to or otherwise contained in the timepiece hands, faces, and bezels. A registration letter for these compounds is attached. Tritium that is used on the hands and dials is doped in crystalline ZnS powders that are mixed with an insoluble polymer. Tritium in capsules is placed on the bezels and is contained in zinc sulfate or zinc silicate which is mixed with an acrylic resin.

(ii) Construction and design.

Dials on the timepieces may have tritium points glued onto a metal plate. The dials are fastened to the movements with screws. The movement is fastened to the timepiece case, that is made of either gold, steel, or platinum. The timepieces are water-resistant. Hands have a metal frame on which tritium is applied. Capsules that contain tritium mixed with an acrylic resin may be carefully glued onto the bezels.

(iii) Method of containment of the tritium.

The hands and dials are contained within the water-resistant case. An adhesive polymer secures the tritium to the hands. Tritiated material in luminous markings is exterior to the case, but it is securely glued onto the bezels. The material is encapsulated in mylar polyester.

(iv) Prototype tests.

Prototype tests were conducted by RC TRITEC, Ltd. A certificate proving compliance with 10 C.F.R. § 32.14(d)(1) is attached. Testing is also in compliance with ISO 3157, NIHS 97-10, and SN 289 710.

(v) Quality control procedures.

All finished timepieces must pass visual inspection and water-resistance tests. The visual inspection checks for, among other things, chipping, flaking, scratches, stains, dust, and poor alignment of the components. Hands are checked for nicks and dents. The water-resistance tests meet the requirements of ISO 2281. Any component of

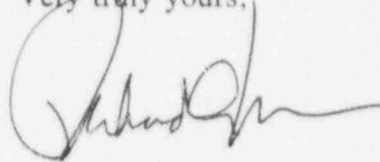
Mr. Anthony S. Kirkwood  
May 28, 1997  
Page 3

the timepieces that is not in compliance is replaced and returned to the manufacturer. All hands are subjected to visual inspection. Quality control procedures and standards for dials conform to NIHS 97-10 and 97-11. Both hands and dials that fail to meet the requirements of ISO 3157 are destroyed. Bezels are certified in compliance with Swiss Standard 814.543.1.

As you requested, I am also attaching a certificate of license compliance.

I understand that with the submission of these materials, the above-referenced application is complete. Please call if you have any questions.

Very truly yours,

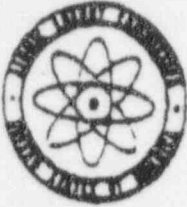
A handwritten signature in black ink, appearing to read 'Richard A. Meserve', with a stylized, flowing script.

Richard A. Meserve

Counsel for Les Must de Cartier  
International Inc.

Attachments





100-107000-100  
OPE:IB:NB

UNITED STATES  
ATOMIC ENERGY COMMISSION  
WASHINGTON, D.C. 20545

NOV 1 1965

Radium-Chemie  
A. Zeller & Co.  
Teufen - App.  
Switzerland

Gentlemen:

This refers to your letter regarding the adequacy of the paint prepared by Radium-Chemie for use on hands and dials which will be imported into the United States.

The information which was provided to us on March 13, 1962, was satisfactory and any person in the United States who desires to import the paint on hands and dials may do so by referencing Radium-Chemie PS362 Tritiated Luminous Paint.

Very truly yours,

Nathan Bassin  
Isotopes Branch  
Division of Materials  
Licensing

AIR MAIL

L

RC TRITEC LTD  
Spetcheswade  
CH-B053 Taufen  
Tel 071 335 73 73  
Fax 071 335 73 74

RC **TRITEC**

## CERTIFICATE OF PROTOTYPE TESTING

ZELLER TRITIUM PAINT BATCH 04/87 (REGISTERED US NRC No. P8382)

This is to certify that the tritium activated luminous paint of production batch 04/87 has been subjected to the prototype testing required under section 32, 14 (ii), 10 CFR 32, of the United States NRC Regulations and in accordance with the ENEA and IAEA Standards.

- a) 5 Dials coated with Zeller Paint containing 28.4 GBq per gram have been attached to the horizontal vibrating table of our FRAIA vibrating machine type V8 operating for one hour at a vibrating of 27 cycles per second and 2 G acceleration.  
Hub ends of 5 hands coated with Zeller paint containing 28.4 GBq per gram have been attached to a clamp and the hands have been banded over a one-inch cylinder.

All components have shown no flaking or chipping of paint

- b) The dials and hands subjected to the vibrating and bending tests as described under a) have been totally immersed in distilled water at room temperature for 24 hours. The analysis of test water for its radioactive material content by means of liquid Scintillation System "Canberra-Packard" Model Tri-Carb 2200 showed the following results:

Set No, dial and hands	MkBq of tritium applied	kBq of tritium in water	percent of tritium in water
1	216	68	0.03
2	244	71	0.03
3	289	66	0.02
4	274	84	0.03
5	280	57	0.02

The Tritium paint batch 04/87 has been manufactured fully in accordance with the information deposited with U.S. Atomic Energy Commission on March 14, 1982 and it meets the test requirements stated in Section 42, 14, title 10, code of Federal Regulations, part 32.

CH-B053 Taufen, 13th february 1987

RC TRITEC LTD.

*U. Pfanner*

K. Pfanner

## CERTIFICATE OF LICENCE COMPLIANCE

The undersigned, by its duly authorized officer, who is fully cognizant of the procedures used, does hereby state that:

- 1) The shipment made on..... (date)  
from..... (exporter)  
to..... (importer)  
contains the following timepieces or components:  
  - (a)..... timepieces with RC TRITEC tritium luminous paint applied to the hands and dials;
  - (b)..... dials coated with RC TRITEC tritium luminous paint;

total activity ..... GBq RC TRITEC tritium luminous paint  
Batch No. ....
- 2) The consignee of this shipment possesses a U.S. Nuclear Regulatory Commission  
Licence No....., Amendment No..... Valid until.....  
to import timepieces with tritium luminous paint applied to the hands and dials  
as required by Title 10, Part 30 and 32, U.S. Nuclear Regulatory Commission
- 3) The timepieces or components have been manufactured in accordance with  
the Standards of the European Nuclear Agency and International Atomic Energy  
Agency.
- 4) The amount of tritium applied to the timepieces or components is not in excess  
of the maximum permissible quantity authorized by NRC regulations; i.e. 925  
Megabecquerels per timepiece, 185 Megabecquerels per hand or 555  
Megabecquerels per dial.
- 5) The prototype tests on the above-mentioned luminous paint batch and quality  
control tests, both as per ENEA and IAEA Standards, have been successfully  
performed.

For and behalf  
(Name of Company)

(Authorized Officer)

<b>TELEPHONE CONVERSATION RECORD</b>		Date: May 27, 1997	Time: 14:58
Mail Control No.: 021904		License No.: NEW	Docket No.: 030-34457
Person Called: Dick Meserve, Esq.		Organization: Cartier, International	Telephone Number: 202-662-5304
Person Calling: Anthony S. Kirkwood			
Subject: License request of 5/7/97			
<p><b>Summary:</b> Mr. Meserve indicated that Cartier, Inc. and Cartier, International were separate corporations. He will send us a summary letter, similar to the one sent with the Cartier, Inc., letter dated 21 Feb 97. He will include the same two documents that were included in this letter, that is the NRC registry of the PS 362 paint and the certificate of prototype testing. He will also extract the Certificate of License Compliance from the May 7th attachments and include it with his response so that the attachments could be returned to Cartier.</p>			
Action Required/Taken: File with docket. Await response.			
Signature: <i>A. Kirkwood</i>		Date: <i>5/27/97</i>	

**From:** Anthony Kirkwood  
**To:** Internet: meserve@cov.com  
**Date:** 5/23/97 17:12  
**Subject:** Questions - Les Must De Cartier International, Inc. (Cartier International)

Mr. Meserve,

This is a heads-up to let you know what I believe is needed in order to complete the license review for Cartier International. The following additional information is needed:

1. Please confirm that Cartier, Incorporated and Cartier International are separate corporations.
2. Submit a descriptive summary of licensed activities, as recently provided in your letter of February 21, 1997, for Cartier, Inc. Please include copies of the November 1, 1965, letter from AEC to Radium-Chemie and the example Certificate of Prototype Testing for the Zeller Tritium Paint Batch, which were included with that letter.
3. Submit a copy of the Certificate of License Compliance found in the May 7, 1997, letter enclosure entitled "Application For Tritium License, Complete File." This is found before the Annexes. we can then return all your enclosures to Cartier International.

Please call me on Tuesday, May 27th to acknowledge receipt of this request and confirm your understanding. Thanks, Tony

CC: JBC

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

FACSIMILE (202) 662-6291

RICHARD A. MESERVE

DIRECT DIAL NUMBER

(202) 662-5304

rmeserve@cqv.com

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 44-171-495-5655

FACSIMILE: 44-171-495-3101

KUNSTLAAN 44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-549-5230

FACSIMILE: 32-2-502-1598

May 22, 1997

By Facsimile and First-Class Mail

Mr. Anthony S. Kirkwood  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
2 White Flint North  
Room 8J10 - Mail Stop T8F5  
11545 Rockville Pike  
Rockville, Maryland 20852-2738

Re: Application for Material License (Tritium)

Dear Tony:

On May 7, 1997, Les Must de Cartier International Inc. ("Cartier International") applied for an exempt distribution license to distribute timepieces and parts containing tritium. You told me that the primary hurdle to the grant of this license was that the NRC must first receive a possession license authorizing storage at the site from which distribution would occur. I am now enclosing a copy of the possession license that Cartier International has received from the Florida Department of Health for this site. Since Cartier International has applied for the authority to distribute the identical set of timepieces and parts for which Cartier, Incorporated recently received an exempt distribution license, I trust that, with the receipt of this possession license, the NRC is prepared promptly to issue an exempt distribution license to Cartier International.

As it happens, the possession license currently has a condition that no timepiece contain more than 3 millicuries of tritium. This results from the mistaken assumption by the Florida Bureau of Radiation Control that all timepieces have lower activities. (Indeed, all but three clocks satisfy this requirement.) We have been told by Mr. Paul Vause of the Florida Bureau of Radiation Control that he would amend the



Mr. Anthony S. Kirkwood  
May 22, 1997  
Page 2

license to permit the storage of any timepieces containing up to 25 millicuries, the maximum allowed by 10 C.F.R. § 30.15 for exempt distribution. We are presently requesting this correction and will forward the amended license to you promptly upon receipt. As requested in the original application of May 7, 1997, Cartier International seeks the authority to distribute all tritiated timepieces and parts that are eligible for exempt distribution.

Please call if you have any questions. Thank you again for your help.

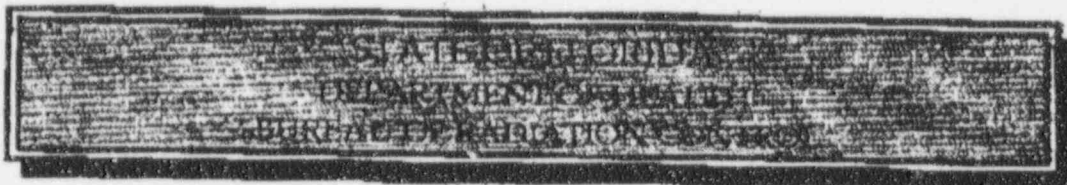
Very truly yours,

A handwritten signature in dark ink, appearing to read 'R. Meserve', written in a cursive style.

Richard A. Meserve

Counsel for Les Must de Cartier  
International Inc.

Enclosure



## RADIOACTIVE MATERIALS LICENSE

Pursuant to Chapter 404, Florida Statutes, and Chapter 10D-01, Florida Administrative Code (F.A.C.), and in reliance on statements and representations heretofore made by the licensee designated below, a license is hereby issued authorizing such licensee to receive, acquire, possess and transfer the radioactive material(s) designated below and to use such radioactive material(s) for the purpose(s) and at the place(s) designated below. This license is subject to all applicable rules, regulations and orders of the state of Florida, Department of Health now or hereafter in effect and to any conditions specified below.

Licensee	
<b>1. Name:</b> LES MUST DE CARTIER INTERNATIONAL INC.	<b>3. License Number:</b> 2784-1
<b>2. Address:</b> 550 Biltmore Way, Fort Coral Gables, FL 33134	<b>4. Expiration Date:</b> 05/31/2002  <b>Category:</b> 3L(V)

<b>5. Radioactive material (element and mass number)</b>	<b>6. Maximum quantity to be possessed at any one time</b>
--	--

- |               |              |  |
|---------------|--------------|--|
| A. Hydrogen 3 | A. Plutonium | A. 10 Curies; no single vial or piece to exceed 3 millicuries each |
|---------------|--------------|--|

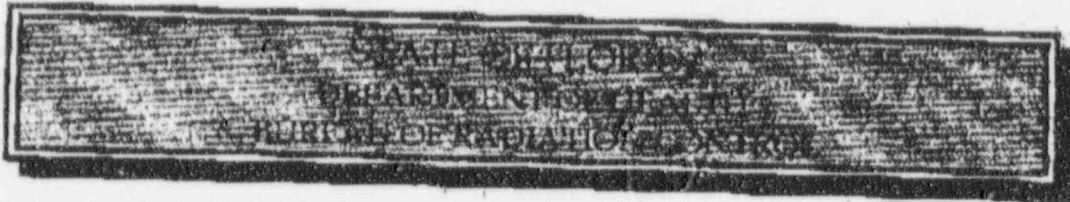
<b>7. Authorized uses</b>	<b>8. Other conditions</b>
---------------------------	----------------------------

- A. To be possessed by the licensee as assembled in pieces for distribution as an exempt item; see conditions 14, 16, and 17 below.

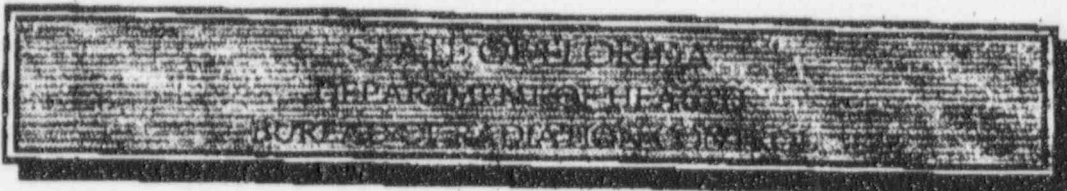
<b>9. Other conditions</b>	<b>10. Other conditions</b>
----------------------------	-----------------------------

10. The authorized place of storage is the licensee's facility located LMC, 2335 N.W. 107th Avenue, Warehouse B58, Miami, FL 33172.
11. Failure to comply with the provisions of this license is a felony of the third degree pursuant to section 404.161, Florida Statutes. Also, violations may warrant an administrative fine of up to \$1,000.00 per violation per day, pursuant to section 404.162, Florida Statutes.
12. A. Licensed materials shall be used by, or under the supervision of, Jose Gao or Dennis Post.

<b>License Number:</b> 2784-1	<b>Licensee Name:</b> LES MUST DE CARTIER INTERNATIONAL INC.	<b>Category:</b> 3L(V)
<b>Address:</b> 550 Biltmore Way, Fort Coral Gables, FL 33134	<b>Expiration Date:</b> 05/31/2002	<b>Other conditions:</b>



12. B. The radiation safety officer is Jose Grao.
13. The licensee shall comply with the provisions of Chapter 10D-91, F.A.C., Part X, "Notices, Instructions and Reports to Workers; Inspections" and Part IV, "Standards for Protection Against Radiation."
14. This licensee does not authorize the application of tritium paints or the repair of surfaces to which the tritium paint has been applied.
15. Radioactive material transported on public thoroughfares shall be packaged, prepared for shipment and transported in accordance with Title 49, Code of Federal Regulations and Chapter 10D-91, F.A.C.
16. This license does not authorize importation of radioactive materials.
17. By-product material as defined in section 404.03(5), Florida Statutes, described in items 6, 7, 8 and 9, supplied to persons exempt from licensing pursuant to a NRC Exempt Distribution License.
18. The licensee shall conduct a physical inventory and inspection at least annually to account for all sealed sources received and possessed under this license as required by section 10D-91.1405, F.A.C. Inventory records shall be maintained for 3 years from the date of the inventory for inspection by the department and shall include the manufacturer's name, model and serial numbers of each sealed source, the identity of each sealed source radionuclide and its estimated activity, the location of each sealed source, the date of the inventory and the signature of the radiation safety officer or designee.
19. A. Except as specifically provided otherwise by this license, the licensee shall possess and use licensed material described in items 6, 7, 8, and 9 of this license in accordance with statements, representations and procedures contained in the licensee's application dated March 20, 1997, signed by Annie Paray, Vice President, Finance & Operations, and correspondence received:  
May 14, 1997, also signed by Annie Paray, Vice President, Finance & Operations.



19. B. The licensee shall comply with all applicable requirements of Chapter 10D-91, Florida Administrative Code, and these regulations shall supersede the licensee's statements in applications or correspondence, unless the statements are more restrictive than the regulations.



Issuance Date: \_\_\_\_\_

MAY 21 1997

For the Bureau of Radiation Control

Paul E. Vause, Jr.  
Health Physicist Supervisor  
1317 Winewood Boulevard  
Tallahassee, FL 32399-8700  
(904) 487-2437

License Number: \_\_\_\_\_  
Control Number: 970324-0057  
Page 3 of 5  
Date: 05/21/97



From: Clarence Breskovic (OIP - Exports)  
To: rdh  
Date: 5/19/97 6:43  
Subject: Tritium and Clocks

Ron,

I got an "answer" from the IAEA:

Our department is preparing a Safety Guide on "Consumer Products Containing Radioactive Substances". I will send you the draft. It is not to be quoted though, as it has not been approved by the RASSAC Committee, yet. NRPB has a document on this subject: "Board Statement on Approval of Consumer Goods Containing Radioactive Substances" documents of the NRPB, volume 3 no 2 1992.

National Radiological Protection Board, Milton, Didcot, Oxon OX11 0RQ, United Kingdom

As well as the European Commission has: Radiation protection 68, "Study on consumer products containing radioactive substances in the EU Member States", Report EUR 15846 EN, 1995. Directorate-General Environment, Nuclear Safety and Civil Protection. Office for Official Publications of the European Communities, Luxembourg.

What next?  
Clarence

5/22 , 1600

Telecon between Gena Kline, Bob Fournier and me.  
Separate locations, i.e. Flt + Tx, require separate licenses, even if same corporation. If product distributed to duty-free shops in US - new tag on PR and VI need E-lines

**From:** Ronald Hauber  
**To:** TWD2.TWP8 (ASK)  
**Date:** 5/16/97 12:24  
**Subject:** CARTIER INTERNATIONAL -Reply

I've asked our international lawyers, Trip Rothschild and Grace Kim to help get you an answer.



From: Anthony Kirkwood  
To: ATD1.ATP2.RLW  
Date: 5/16/97 8:51  
Subject: CARTIER INTERNATIONAL

MR. WOODRUFF, SAO, RII

THE ABOVE HAS APPLIED FOR AN EXEMPT DISTRIBUTION LICENSE FROM NRC AND A POSSESSION LICENSE FROM FLORIDA. THEY HAVE BEEN DISTRIBUTING TRITIUM PAINTED WATCHES SINCE 1988 TO THE CARIBBEAN AND DUTY-FREE SHOPS WITHIN THE US. I'VE ASKED OIP IF THIS FALLS WITHIN NRC JURISDICTION. THERE SISTER COMPANY, CARTIER, INC., HAD AN ENFORCEMENT CONFERENCE IN RI YESTERDAY FOR CONDUCTING U.S. OPERATIONS IN A SIMILAR WAY.

TONY KIRKWOOD  
NMSS/IMNS/IMAB

CC: SLB, DAB, JBC, KPD1.KPP1.JMJ, KPD1.KPP1.JRM, KPD1....

Mail Envelope Info: (337C583B 868 : 18 : 34447)

Subject: CARTIER INTERNATIONAL  
Creation Date: 5/16/97 8:51  
From: Anthony Kirkwood

Created By: TWD2.TWP8:ASK

Recipients	Action	Date & Time
Post Office ATD1.ATP2	Delivered	05/16/97 08:53am
RLW (Richard Woodruff)	Opened	05/16/97 09:23am
Post Office KPD1.KPP1	Delivered	05/16/97 08:57am
CZG CC (Craig Gordon)	Opened	05/16/97 09:04am
	Deleted	05/19/97 08:51am
JMJ CC (Jenny Johansen)	Opened	05/16/97 08:57am
JRM CC (John McGrath)	Opened	05/16/97 11:30am
	Deleted	05/16/97 11:31am
	Emptied	05/27/97 03:40pm
Post Office TWD2.TWP8	Delivered	05/16/97 08:51am
DAB CC (Doug Broadus)	Opened	05/20/97 06:59am
	Deleted	05/20/97 07:00am
	Emptied	06/02/97 06:03pm
JBC CC (J. Bruce Carrico)	Opened	05/16/97 08:55am
	Deleted	05/29/97 10:59am
	Emptied	06/02/97 06:44pm
SLB CC (Steven Baggett)	Opened	05/19/97 06:29am
	Deleted	05/19/97 06:31am
	Emptied	06/02/97 08:07pm
Post Office WND1.WNP9	Delivered	05/16/97 08:51am
RDH BC (Ronald Hauber)	Opened	05/16/97 11:47am
	Replied	05/16/97 12:24pm
Domain.Post Office	Delivered	Route
ATD1.ATP2	05/16/97 08:53am	ATD1.ATP2
KPD1.KPP1	05/16/97 08:57am	KPD1.KPP1
TWD2.TWP8	05/16/97 08:51am	TWD2.TWP8
WND1.WNP9	05/16/97 08:51am	WND1.WNP9

Files	Size	Date & Time
MESSAGE	466	05/16/97 08:51am
View	4109	05/16/97 04:51am

Options

Auto Delete:	No
Expiration Date:	None
Notify Recipients:	Yes
Priority:	Normal
Reply Requested:	No
Return Notification::	None
Concealed Subject:	No

From: Anthony Kirkwood  
To: RDH  
Date: 5/15/97 17:06  
Subject: CARTIER INTERNATIONAL

MR. HAUBER,

THIS COMPANY HAS JUST APPLIED FOR A LICENSE TO DISTRIBUTE WATCHES UNDER THE 32.14 EXEMPTION TO THE CARRIBEAN AND TO DUTY-FREE SHOPS WITHIN THE US. CAN YOU TELL ME IF THIS FALLS UNDER OUR LICENSING JURISDICTION OR NOT. AS AN ASIDE THEY'VE BEEN DOING THIS FOR NINE YEARS WITHOUT A LICENSE.

THANKS FOR ANY HELP/ADVICE,

TONY

030 - 34457

COVINGTON & BURLING

1201 PENNSYLVANIA AVENUE, N. W.

P.O. BOX 7566

WASHINGTON, D.C. 20044-7566

(202) 662-6000

FACSIMILE: (202) 662-6291

RICHARD A. MESERVE

DIRECT DIAL NUMBER

(202) 662-5304

rmeserve@cov.com

LECONFIELD HOUSE

CURZON STREET

LONDON W1Y 8AS

ENGLAND

TELEPHONE: 44-(71)-495-5655

FACSIMILE: 4-(71)-495-3101

KUNSTLAAN 44 AVENUE DES ARTS

BRUSSELS 1040 BELGIUM

TELEPHONE: 32-2-549-5230

FACSIMILE: 32-2-502-1596

May 7, 1997

BY HAND

Mr. Carl J. Paperiello  
Director  
Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
11545 Rockville Pike  
Two White Flint North  
Rockville, Maryland 20852

Re: Application for Material License (Tritium)

Dear Mr. Paperiello:

At the request of my client, *Les Must de Cartier International Inc.* ("Cartier International"), I hereby enclose for filing two copies of an application for an Exempt Distribution license, pursuant to 10 C.F.R. § 30.15, to distribute watches and clocks that contain tritium. I am also including the application fee of \$4,400 that is required by Section 170.31(3)(I).

As I informed one of your staff (Anthony Kirkwood) some time ago, Cartier International has distributed watches from its Miami facility since 1988 to destinations in the Caribbean and to duty-free shops within the United States. When Cartier International began its operations, it was unaware that any of its products might be subject to regulatory oversight by the U.S. Nuclear Regulatory Commission ("NRC"). Cartier International now understands that the NRC requires an exempt distribution license for domestic distribution and that Florida requires a possession license for Cartier International's possession of tritium-containing timepieces. Cartier International has completely suspended the distribution of such timepieces to locations within the United States, pending receipt of appropriate licenses.

021904

Mr. Carl J. Paperiello  
May 7, 1997  
Page 2

Cartier International initially intends to carry the same product line as its sister company, Cartier, Incorporated, which received an exempt distribution license on April 29, 1997 (license No. 31-23847-01E). As a result, Cartier International is including in its application the same materials that Cartier, Incorporated submitted to the NRC for its exempt distribution license application. These contain detailed information about the products to be distributed, as required by Sections 32.14 and 32.15. In the future, Cartier International may also carry a number of watches manufactured by Baume & Mercier. Cartier International will seek amendment of its license at the proper time to include similar information about these watches.

Cartier International applied for a possession license from the State of Florida on March 24, 1997. The NRC will promptly be informed upon the issuance of this license. In the meantime, however, if you have any questions or concerns, please do not hesitate to call me.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Richard A. Meserve", written over a large, loopy initial "R".

Richard A. Meserve

Counsel for Les Must de Cartier  
International Inc.

Enclosures

cc: Mr. Anthony Kirkwood

(7-96)  
10 CFR 30, 32, 33  
34, 35, 36, 39 and 40

Estimated burden per response to comply with this information collection request: 7 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. Forward comments regarding burden estimate to the Information and Records Management Branch (T-6 F33), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, and to the Paperwork Reduction Project (3150-0120), Office of Management and Budget, Washington, DC 20503. NRC may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

## 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.

## APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY  
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:

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

LICENSING ASSISTANT SECTION  
NUCLEAR MATERIALS SAFETY BRANCH  
U. S. NUCLEAR REGULATORY COMMISSION, REGION I  
475 ALLENDALE ROAD  
KING OF PRUSSIA, PA 19406-1415

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

NUCLEAR MATERIALS LICENSING SECTION  
U. S. NUCLEAR REGULATORY COMMISSION, REGION II  
101 MARIETTA STREET, NW, SUITE 2900  
ATLANTA, GA 30323-0199

## IF YOU ARE LOCATED IN:

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

MATERIALS LICENSING SECTION  
U. S. NUCLEAR REGULATORY COMMISSION, REGION III  
801 WARRENVILLE RD.  
LISLE, IL 60532-4351

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS,  
LOUISIANA, 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 SECTION  
U. S. NUCLEAR REGULATORY COMMISSION, REGION IV  
811 RYAN PLAZA DRIVE, SUITE 400  
ARLINGTON, TX 76011-8064

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 \_\_\_\_\_

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

Les Must De Cartier International Inc.  
550 Biltmore Way, PH1  
Coral Gables, FL 33134

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

Les Must De Cartier International Inc.  
2335 NW 107th Avenue  
Miami, FL 33172

## 4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Annie Paray

## TELEPHONE NUMBER

(305) 448-4111

SUBMIT ITEMS 5 THROUGH 11 ON 14-1/2 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. LICENSEE FEES (See 10 CFR 170 and Section 170.31)

FEE CATEGORY 170.31(3)(I) AMOUNT ENCLOSED \$ 4400.00

## 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, 36, 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 Finance &  
Annie Paray, Vice President, Operations

SIGNATURE

*Annie Paray*

DATE

05/01/97

## FOR NRC USE ONLY

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

021904



*les must<sup>®</sup> de Cartier*  
INTERNATIONAL INC.

550 BILTMORE WAY  
PENTHOUSE 1  
CORAL GABLES, FL 33134  
U.S.A.

TEL.: (305) 448-4111  
FAX: (305) 448-3057  
TELEX: 798 151 CARTIER MIA UD

May 5, 1997

Philip J. Rosenthal  
Covington & Burling  
P.O. Box 7566  
Washington, D.C. 20044-7566

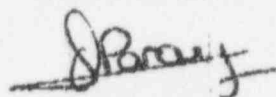
Dear Phil,

As you know, *Les Must de Cartier International, Inc.* initially plans to distribute the same tritium-containing timepieces, hands, and dials as Cartier, Incorporated. Please, therefore, include in our application for an NRC exempt distribution license the same materials that Cartier, Incorporated submitted to the NRC for its license. These materials should include the corrections detailed by Mr. Willem Van Kampen in his memorandum to you of March 26, 1997.

If you have any questions, please do not hesitate to call me.

Best regards,

Very truly yours,



Annie Paray  
Vice President  
Finance & Operations

## Cartier International Service

TO: Mr. Philip Rosenthal PLS NOTE ADD. CORRECTIONS March 26, 1997  
FROM: Willem Van Kempen  
SUBJECT: Tritium spreadsheet 3/21/97 update CC: Joyce Brown  
Bernard Matthey  
This fax contains 2 pages

---

Dear Phil,

This memo confirms our discussion as to some needed changes to the documentation provided.

For hands reference VC110069 are two Tritec certificates enclosed, one dated 9/15/95 and another one 2/26/97. The one from 1995 was used in the spreadsheet. We do prefer to use the most recent information reason why we request the following corrections to be made.

Watch reference number W30019D1, W30019D2, W3001951, W3004151, W30041H9, W3004251, W30042H9, W3101955 and W31019H2 please change the value for the hands reference VC110069 from 0.4 mCI to 37 MBq (1.00 mCI)

The total values in either MBq or mCI need also to be updated as follows: W30019D1, D2 and 51 to 1.00 mCI, reference number W3004151 and H9 to 1.14 mCI, reference number W3004251 and H9 to 1.00 mCI and reference number W3101955 and H2 to 1.84 mCI.

For reference numbers W30019D1, W30019D2 and W3001951 an incorrect dial reference had been entered. Please change the reference VC100467 to VA100161 also note that this dial does not carry any tritium. (The above given total mCI corrections include this correction as well.)

A typing error was made. Please correct the entry for the hands reference 1753387 to 17503387 for watch reference W3004651.

The reference numbers W30011C1, D1, D2, 51 and 53 have not only a hour and minute hand but an alarm hand as well. The second reference number in the hands column is this alarm hand, its 0.1 mCI (3.7 MBq) value must be added to the total MBq of these references. For a total of 20.7 MBq or 0.56 mCI.

Last but not least several rows do not give totals in either MBq or mCI please use the following values to enter in these locations

W3100655 total 38.1 MBq,

W31011H3 and 55 total 49.8 MBq,

W30120H9 and 51 total 55.8 MBq,

CARTIER INTERNATIONAL SERVICE  
PO BOX 610608, 1226 ROYAL LANE, DFW AIRPORT, TX 75261. Tel (972) 674-3161. Fax (972) 674-2636

W31024M7 total 66 MBq,  
W31028N1 total 57.5 MBq,  
W3008451 total 54.1 MBq,  
\* W31027H3 total 41.9 MBq,  
W3102755 total 41.9 MBq,  
W0100003 total 171.7 MBq,  
W0100002 total 9.7 MBq,  
W0100014 total 11.7 MBq,  
W0100007 total 6.2 MBq.

Thank you for your attention to these matters.

Sincerely,

  
Willem Van Kempen

\* ADDENDUM: Please note that watch reference W31027H3 and W3102755 both have tritiated bezels.  
Please add to reference number W31027H3 the bezel reference VA020020, Billight, 5 MBq, 0.14 mCi and a total of 41.9 MBq.

CARTIER INTERNATIONAL SERVICE  
PO BOX 610608, 1236 ROYAL LANE, DFW AIRPORT, TX 75261. Tel (972) 574-2161. Fax (972) 574-2636