



April 14, 2021

LICENSING ASSISTANCE TEAM  
DIVISION OF NUCLEAR MATERIALS SAFETY  
US NUCLEAR REGULATORY COMMISSION, REGION I  
2100 RENAISSANCE BLVD, SUITE 100  
KING OF PRUSSIA, PA 19406-2713

**Subject: AMENDMENT of Materials License 20-23981-01E**

Dear Sir or Madam,

JW North America, Inc. is an importer and distributor of metal halide lamps (electron tubes) containing trace amounts of radioactive Kr-85. Handling and distribution of our products is conducted in accordance with our E license, 20-23981-01E. This license was renewed in March 2020.

In our license renewal application, dated January 29, 2020, we provided an extensive list of specific products that were to be covered by our renewed license. This list included ~75 specific parts with varying activities of Kr-85.

During a recent inspection of our warehousing facility at Kennesaw GA conducted by Mr. Jason vonEhr (Health Physicist at the NRC's Region I office), it was discovered that we had distributed in 2020, two lamps that were not on the original listing provided in our renewal application. In other words, we had distributed two types that were not specifically authorized by our license. After investigating this issue, I have determined that these two lamps were not included in our renewal application due to a basic error in oversight. Interestingly, one of the two lamps (our Part Number 24101) was, in fact, authorized by our original license issued in 2010, but was left off our 2020 renewal application. *This is a lamp scheduled to be discontinued and I may have been anticipating the disposition of the few remaining pieces in our inventory prior to the expiration of our original license.*

Regardless, of the possible explanation for the omissions, we now seek to amend our current license to include the two types.

And, in addition, we would like to “preemptively” add a third (new) lamp to our list that we are intending to order from our supplier in the next month. This “new” lamp is merely a brand variation of a type already authorized in our current license.

The basic descriptors for the three lamps are summarized in the table below:

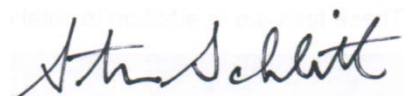
JWNA PART NO.	PRODUCT DESCRIPTION	Kr85 Activity per lamp (uCi)	Remarks
24101	CosmoTech 1200W	0.065	Inadvertently omitted from current license. Lamp was originally in JWNA's 2010-2020 license.
SQ0800SI	SUPRA Q-0800SI	0.059	Inadvertently omitted from current license. Identical design construction as lamps in JWNA Group 5.
24250	Cosmedico M 250W SE	0.030	New lamp anticipated for delivery May –June 2021. Identical arc tube construction as SUPRA Q-0250PIGY

To bring our listing of Kr85 containing products up to date, I have added the above- mentioned lamps to the JWNA Master list. You will find this list as an addendum to this letter.

Furthermore, you will find representations of the labeling that is, or will be, applied to the three lamps which are the subject of this amendment.

We look forward to your review and approval of our request to add the 3 lamps to our list of products which we intend to distribute under our current exempt materials license.

Respectfully submitted,



Steven Schlitt

*Steven Charles Schlitt  
JW North America, Inc.  
Director of Engineering and Quality Assurance  
781-331-0949 (Office)  
781-534-0574 (Cell)*

cc  
J. VonEhr – NRC  
J. Foster – JWNA  
K. Apgar - JWNA

<b>NRC FORM 313</b> <b>U.S. NUCLEAR REGULATORY COMMISSION</b> (01-2020) 10 CFR 30, 32, 33, 34, 35, 36, 37, 39, and 40	<b>APPROVED BY OMB: NO. 3150-0120</b> <b>EXPIRES: 01/31/2023</b> 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-6 A10M), U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001, or by e-mail to <a href="mailto:Infocollects.Resource@nrc.gov">Infocollects.Resource@nrc.gov</a> , and to the Desk Officer, Office of Information and Regulatory Affairs, NEOB-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.
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## APPLICATION FOR MATERIALS LICENSE

**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.**

<b>APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:</b> 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  <b>ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:</b>  <b>IF YOU ARE LOCATED IN:</b> 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,  <b>SEND APPLICATIONS TO:</b> 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	<b>IF YOU ARE LOCATED IN:</b> 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  <b>IF YOU ARE LOCATED IN:</b> 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,  <b>SEND APPLICATIONS TO:</b> NUCLEAR MATERIALS LICENSING BRANCH U.S. NUCLEAR REGULATORY COMMISSION, REGION IV 1600 E. LAMAR BOULEVARD ARLINGTON, TX 76011-4511
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**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) <input type="checkbox"/> A. NEW LICENSE <input checked="" type="checkbox"/> B. AMENDMENT TO LICENSE NUMBER <u>20-23981-01E</u> <input type="checkbox"/> C. RENEWAL OF LICENSE NUMBER      _____	2. NAME AND MAILING ADDRESS OF APPLICANT (Include zip code) <b>JW NORTH AMERICA, INC.</b> <b>200 LEDGEWOOD PLACE, SUITE 201</b> <b>ROCKLAND MA 02370</b>				
3. ADDRESS WHERE LICENSED MATERIALS WILL BE USED OR POSSESSED <b>JW NORTH AMERICA, INC.</b> <b>980 COBB PLACE BLVD, SUITE 200</b> <b>KENNESAW GA 30144-4805</b>	4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION <b>Steven Schlitt</b> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:50%;">BUSINESS TELEPHONE NUMBER <b>781-331-0949 (x107)</b></td> <td style="width:50%;">BUSINESS CELLULAR TELEPHONE NUMBER <b>781-534-0574</b></td> </tr> <tr> <td colspan="2">BUSINESS E-MAIL ADDRESS <b>sschlitt@jwnorthamerica.com</b></td> </tr> </table>	BUSINESS TELEPHONE NUMBER <b>781-331-0949 (x107)</b>	BUSINESS CELLULAR TELEPHONE NUMBER <b>781-534-0574</b>	BUSINESS E-MAIL ADDRESS <b>sschlitt@jwnorthamerica.com</b>	
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BUSINESS E-MAIL ADDRESS <b>sschlitt@jwnorthamerica.com</b>					

**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. 8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS. 10. RADIATION SAFETY PROGRAM.	6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED. 7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING AND EXPERIENCE. 9. FACILITIES AND EQUIPMENT. 11. WASTE MANAGEMENT.
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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 CATEGORY	AMOUNT ENCLOSED \$	
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**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 <b>Steven Schlitt</b>	SIGNATURE 	DATE <b>4-12-2021</b>
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FOR NRC USE ONLY					
TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

TABLE 5.1 (UPDATED 2021-04-12)

## JW North America Product Range - Metal Halide Lamps

JWNA Item Part Number	Description	BLV Part Number	Power (W)	Base Type	Overall Length (mm)	Bulb Diameter (mm)	Calculated Tube Volume (mm <sup>3</sup> )	Nominal Kr85 (Bq) per Lamp	Nominal Kr85 (uCi) per Lamp	GROUP
920677041	CLEO HPA 250-500 / 30 SDC	3326 0102	400	Wire Leads	96	13.5	3500	875	0.024	1
913132641	CLEO HPA 250-500 / 30 SDL	3326 0106	400	R7s	106	13.5	3500	875	0.024	
913134045	CLEO HPA 250-500 SE FX	3326 0206	400	GY9.5 (5Way)	114	13.5	3500	875	0.024	
900612555	ERGOLINE ULTRA 520W	3326 0173	400	GY9.5 (5Way)	114	13.5	3500	875	0.021	
919300145	CLEO HPA 400 /30 SDC	3343 0105	400	Wire Leads	96	13.5	3500	875	0.024	
913137141	CLEO HPA 400 /30 SD L	3343 0107	400	R7s	106	13.5	3500	875	0.024	
21104-1	JK-RUSA 400W R7s	2333 0111	400	R7s	106	13.5	3500	875	0.024	
24003-1	COSMEDICO M 400W R7s	2333 0103	400	R7s	106	13.5	3500	875	0.024	
R03060	RADIANCE HP 400-500W R7s	2333 0120	400	R7s	106	13.5	3500	875	0.024	
SQ04500SI	SUPRA Q-04500SI	2333 0121	400	R7s	106	13.5	3500	875	0.024	
LET 004.0040	Corona 300/500W SE	3326 0657	300-500	GY9.5	111	13.5	3500	875	0.024	
R02602	RADIANCE HP 400-500W L	2333 0205	400	Wire Leads	114	13.5	3500	875	0.024	
R02609	RADIANCE HP 300-520W GY9.5	2322 2101	400	GY9.5 (5Way)	114	13.5	3500	875	0.024	
SQ03520PIJK	SUPRA Q-03520 PIJK	2322 2106	400	GY9.5 (5Way +1)	114	13.5	3500	875	0.024	
SQ04500WL	SUPRA Q-04500SI	2333 0206	400	Wire Leads	114	13.5	3500	875	0.024	
30137 / MPI 14083	EVOLUTION LIGHT 400W 230V	2333 1301	400	BLS-274	148.5	13.5	3500	875	0.024	
SQ0250PIGY	SUPRA Q-0250PIGY	2363 2002	250	GY9.5 (5Way +1)	70	15	2900	1100	0.030	2
24250	Cosmedico M 250W SE	115065	250	GY9.5 / 24	70	15	2900	1100	0.030	
LET 004.1031	Corona 400/30 S	3342 0659	400	BLS-015	103	16.9	6500	1600	0.043	3
LET 004.1032	Corona 400/30 SL	3342 0656	400	BLS-015	104	16.9	6500	1600	0.043	
913138841	CLEO HPA 400 /30 S L	3342 0107	400	R7s	106	16.9	6500	1600	0.043	
LET 004.0105	Corona 500/700 SE-K (HPA 640 SE FX)	3342 0657	500-700	GY9.5 Coded	116	16.9	6500	1600	0.043	
LET (30680)	Corona 400 S	3340 0607	400	BLS-015	117	16.9	8600	2200	0.059	4
BLE-400	Spectronics BLE-400	3340 0107	400	R7s L	118	16.9	8600	2200	0.059	
919220245	CLEO HPA 400 S	3340 0105	400	R7s	118	16.9	8600	2200	0.059	
920669541	CLEO HPA 700 S FX	3370 0602	650	R7s	118	16.9	8600	2200	0.059	
LET (30681)	Corona 700/800 FX C	3340 0608	700-800	Wire Leads	126.5	16.9	8600	2200	0.059	
R02606	RADIANCE HP 630W P	3370 0810	600	Pins - BLS-025GK	138	16.9	8600	2200	0.059	
SQ06630R	SUPRA Q-06630R	3370 0811	600	Pins - BLS-025GK	138	16.9	8600	2200	0.059	
LET 004.0044	Corona 630W	3370 0857	650	Pins (9150 4206)	138	16.9	8600	2200	0.059	



JWNA Item Part Number	Description	BLV Part Number	Power (W)	Base Type	Overall Length (mm)	Bulb Diameter (mm)	Calculated Tube Volume (mm <sup>3</sup> )	Nominal Kr85 (Bq) per Lamp	Nominal Kr85 (uCi) per Lamp	GROUP
921376145	CLEO HPA 620 FX	3370 0709	650	Wire Leads	158	16.9	8600	2200	0.059	
LET 004.0043	Corona 620 FX	3370 0657	650	Wire Leads	158	16.9	8600	2200	0.059	
24178-1	COSMEDICO M 800W R7s	2362 0103	800	R7s	115	18.5	8000	2200	0.059	
SQ0800SI	SUPRA Q-0800SI	2362 0104	800	R7s	115	18.5	8000	2200	0.059	
SQ0800PIYL	SUPRA Q-0800PIY-L	2362 7004	800	GY9.5 (5Way +1)	120	18.5	8000	2200	0.059	5
24294 / MPI 14085	EVOLUTION LIGHT 620/650 230V	2362 1301	620-650	BLS-274	159	18.5	8000	2200	0.059	
30138 / MPI 14086	EVOLUTION LIGHT 800W 230V	2362 1302	800	BLS-274	159	18.5	8000	2200	0.059	
938670245	CLEO HPA 1010 SE FX	3388 3006	975	GY9.5 (5Way)	116	25	12500	4600	0.124	
24022-1	COSMEDICO M 1000W SBSN GY9.5	2388 5004	1000	GY9.5 (5Way)	116	25	12500	4600	0.124	
R02610	RADIANCE HP 800-1000W GY9.5c	2388 3020	1000	GY9.5 (5Way)	116	25	12500	4600	0.124	
SQ08100PIGYL	SUPRA Q-08100PIGY-L	2388 3021	1000	GY9.5 (5Way +1)	116	25	12500	4600	0.124	6
LET 004.0041	Corona 800-1000W / 220V	3388 0657	1000	GY9.5	116	25	12500	4600	0.124	
LET 004.0047	Corona 800/1000 / SEK	3388 0757	1000	GY9.5 Coded	116	25	12500	4600	0.124	
24171-1	COSMEDICO M 1000W SE GY9.5	2388 2003	1000	GY9.5-L	135	25	12500	4600	0.124	
R02600	RADIANCE HP 1000-1400W L	2348 0301	1500	Wire Leads	139	28	26600	5000	0.135	
SQ01400WL	SUPRA Q-01400WL	2348 0304	1500	Wire Leads	139	28	26600	5000	0.135	
SI-01400PIGH	SUN ITALIA SI-01400PIGH	2348 5001	1500	GY9.5 (5-Way)	143	28	26600	5000	0.135	
LET 004.0202	Corona 1000W SE-S GX12	2348 0856	1000	GX-12 (GOLD PINS)	144	28	26600	5000	0.135	
SQ01530R	SUPRA Q-01530R	2348 0602	1500	Pins - BLS-025GK	146	28	26600	5000	0.135	7
LET 004.0048	Corona 1530W	2348 0657	1500	Pins	146	28	26600	5000	0.135	
SQ01400LWL	SUPRA Q-01400LWL	2348 0503	1500	Wire Leads	168	28	26600	5000	0.135	
30139 / MPI 14087	EVOLUTION LIGHT 1000W 230V	2348 1301	1000	BLS-274	173	28	26600	5000	0.135	
30140 / MPI 14088	EVOLUTION LIGHT 1400W 230V	2348 1302	1400	BLS-274	173	28	26600	5000	0.135	
24007-1	COSMEDICO 500W R7s	2305 0102	450	R7s	106	16.3	5000	5600	0.151	
24006-1	COSMEDICO M 500 W SE	2305 2003	450	GY9.5 (5WAY)	114	16.3	5000	5600	0.151	
24008-1	COSMEDICO M 500W L	2305 0202	450	Wire Leads	114	16.3	5000	5600	0.151	
R02614	RADIANCE HP 600-650W GY9.5	2305 2005	450	GY9.5 (5Way)	114	16.3	5000	5600	0.151	8
SQ0600PIGYL	SUPRA Q-0600PIGY-L	2305 2006	450	GY9.5 (5WAY+1)	114	16.3	5000	5600	0.151	
445001	PC TAN ETERNAL SUN 67 (K423C)	2305 5007	450	GY9.5 (5Way)	118	16.3	5000	5600	0.151	
SI-0650PIX	SUN ITALIA SI-0650PIX	2338 3001	600	GY9.5-L	133	16.3	5000	5600	0.151	
21112-1	COSMEDICO M 650W SE GY9.5	2347 2003	650	GY9.5 (5Way)	126	16.3	7100	8000	0.216	
LET 004.0102	Corona 620W GX12	2351 0902	600	GX-12	133	16.3	7100	8000	0.216	
SQ0600WL	SUPRA Q-0600WL	2397 0502	600	Wire Leads	145	16.3	7100	8000	0.216	a

JWNA Item Part Number	Description	BLV Part Number	Power (W)	Base Type	Overall Length (mm)	Bulb Diameter (mm)	Calculated Tube Volume (mm <sup>3</sup> )	Nominal Kr85 (Bq) per Lamp	Nominal Kr85 (uCi) per Lamp	GROUP
R02611	RADIANCE HP 620W L	2309 0608	600	Wire Leads	157	16.3	7100	8000	0.216	9
SQ0610LWL	SUPRA Q-0610LWL	2309 0609	600	Wire Leads	157	16.3	7100	8000	0.216	
24293 / MPI 14084	EVOLUTION LIGHT 500W 230V	2397 1301	500	BLS-274	159	16.3	7100	8000	0.216	
996000101	ERGOLINE JK 60/80 EF	2359 5001	600	GY9.5 (5Way)	115	18.5	7200	8250	0.223	10
R02362	RADIANCE HP 600-800 GY9.5	2359 5003	600	GY9.5 (5Way)	115	18.5	7200	8250	0.223	
480001	PC TAN ETERNAL SUN 105 (HE-48C)	2359 5004	600	GY9.5 (5Way)	115	18.5	7200	8250	0.223	
SQ01400WL4	SUPRA Q-01400WL4	2319 0304	1200	Wire Leads	139	25	20000	14800	0.400	11
76000470	AUVL 1000W DE MH 400V 5.5K	76000470	1000	Wire Leads / K12	125	25	9800	16000	0.432	11A
R02621	RADIANCE HP 800-1250W GY9.5c	2350 5005	1200	GY9.5 (5Way)	135	25	20000	18500	0.500	12
SQ0900PIGH	SUPRA Q-0900PIGH	2350 5006	1200	GY9.5 (5Way +1)	135	25	20000	18500	0.500	
LET 004.0013	Corona 1000W 220V	3312 0301	1000	BLS-003	138	25	20000	18500	0.500	
24103-1	COSMEDICO M 1000 L	2312 0303	1200	Wire Leads	139	25	20000	18500	0.500	
913103645	CLEO HPA 1200 FX	3312 0306	1200	Wire Leads	166	25	20000	18500	0.500	
LET 004.0037	Corona 1000/1500 220V	3312 0657	1200	Wire Leads	166	25	20000	18500	0.500	
24101	COSMOTECH 1200W	24101	1200	Wire leads	139	25	20000	2220	0.065	13

## Individual Package Labeling for SUPRA Q-0800SI



## Individual Package Labeling for Cosmedico PN 24250



## Individual Package Labeling for Cosmotech PN 24101



This product precedes the use of UDI labels.

Due to the very small size of the electron tubes, the JWNA NRC License 20-23981-01E permits the Kr85 notification and manufacturer's name to be printed on the immediate packaging uniquely associated with the products, in lieu of direct printing on the products.