



TRUGLO®

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WHEN BRIGHTNESS COUNTS

September 26, 2002

Nima Ashkeboussi
Engineering Aide
Materials Safety and Inspection Branch
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Material Safety and Safeguards
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

via FedEx and telecopy (301-415-5369)

Re: Application of TRUGLO, Inc., dated June 12, 2002

Dear Mr. Ashkeboussi:

This letter is in response to your written request for additional information, dated September 20, 2002. We have tried to address each noted deficiency so that the review of our application can proceed. Our responses are stated on the following pages.

We appreciate all your help and prompt attention. If you have any questions, please do not hesitate to contact me at (972) 774-0300. Again, thank you.

Sincerely,


Lorraine Hellinghausen
Radiation Safety Officer
TRUGLO, Inc.

1. Additional Information Required

- 1.1 The results of the additional prototype testing are attached hereto and labeled "Attachment I".
- 1.2 Please note that we have taken into consideration (for accident conditions such as fire) the maximum number of sources that would be stored at our facility at any given time.
- 1.3 The maximum number of sources in one container during inspection is 25 (25 sources x 30 millicuries/source = 0.75 curies of tritium). The approximate inspection time is one minute. There is no external radiation level due to the thickness (0.25 mm) of the borosilicate glass container encapsulating the tritium and the density of the borosilicate glass (2.6 g/cm³).

2. Clarifications

- 2.1 We acknowledge your note regarding the use of sources having a registration certificate.
- 2.2 The prototype sight pin ("Exhibit A") was marked "PT-H3" because P-T Night Sights (21st Century Technologies) currently manufactures the sight pins on our behalf. We have included herewith a new prototype sight pin marked "TG-H3."
- 2.3 We acknowledge your note regarding the scope of our application.

Attachment I

The results of the additional prototype testing for the TG-20 Series pursuant to 10 CFR 32.22 are listed below. Five sight pins of each model were subjected to the tests below. The same sight pins were used for each test below, as well as the prototype tests that were previously performed. Each sight pin was visually inspected between each test and after completion of all the tests to ensure that no detrimental effects had occurred. In summary, no detrimental effects were found in either case.

Temperature Shock

The temperature of the sight pin was raised to 80°C and held at this temperature for 15 minutes. The sight pin was then transferred (within 15 seconds) to a cold chamber having a temperature of -46°C and held in this chamber for 15 minutes. Each sight pin was visually inspected after completion of the above test and no detrimental effects were identified.

Pressure

The sight pin was placed in a test chamber and exposed to 0.25 and 2.0 bars for 4 periods of 15 minutes each. The pressure was returned to atmosphere between each period. Each sight pin was visually inspected after completion of the above test and no detrimental effects were identified.

Penetration

A 10g hammer with a small point was dropped from a height of one meter onto the exposed surface of the light source. Each sight pin was visually inspected after completion of the above tests and no detrimental effects were identified.