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FACSIMILE TRANSMISSION

30 June 2005

TO: **US Nuclear Regulatory Commission**
Region I
Division of Nuclear Materials Safety
Commercial and R&D Branch

ATTN: Ms. Elizabeth Ullrich
Ms. Farrah Gaskins

31-23902-02
03036913

REF: Mail Control Number 136761

FROM: Brad Fisher

Dear Ms. Ullrich and Ms. Gaskins,

Please find attached our reply to your Request for Additional Information Concerning Application for New License.

Sincerely,

Brad Fisher
Operations Manager

Number of Pages Including this Cover Page: 5

MEPROLIGHT, Inc. Corporate (C/O Klein & Hill) 521 Fifth Avenue, New York, NY 10175
Tel: 212-697-4455 Fax: 212-697-1958 E-mail: bradf@meprolight.com
www.meprolight.com

136761
NMSS/RGNI MATERIALS-002

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30 June 2005

United States Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406-1415

ATTN: Ms. Elizabeth Ullrich

SUBJECT: NRC Request for Additional Information - Ref: Mail Control 136761

Dear Ms. Ullrich,

The following is provided in response to your 16 May letter, subject as above, and your subsequent comments by email dated 15 June 2005.

1. Mr. Kerry Kinder has been designated as an authorized user and, in Mr. Fisher's absence, alternate RSO. Mr. Kinder has been the National Sales Manager for Meprolight's tritium illuminated sights and other exempt products sold and distributed in the United States by HESCO (in Georgia) for over 10 years and has had the same responsibilities for Meprolight (in New York) from 2001 until today. He has been alternate RSO for Meprolight since January 2001. In this capacity, Mr. Kinder has been responsible for receipt, inspection and storage of tritium illuminated products (up to 750 Ci stored at any given time) and their subsequent distribution. During the last 15 years, he has acted as a technical interface between the customer in the United States and the Meprolight manufacturing facility in Israel. He has a full working knowledge of the devices, their method of illumination and the instruments to which they are mounted. Mr. Kinder has successfully completed a Radiation Safety Officer course. A certificate listing the subjects covered is enclosed herein.

2. Routine and incident/emergency surveys will be conducted as follows:

   a) A brief discussion of the products and risks is provided as an introduction to the subject. The items in question are illuminated night sights (usually individually packaged in sets of front and rear) with each sight containing no more than 36 mCi of tritium in gaseous form. The tritium is sealed inside a glass capsule that is sealed inside of a metal housing by means of an optical adhesive. The sights are used by law enforcement and military agencies throughout the world and are extremely rugged. Extensive testing performed on these sights has shown that, when significant damage is caused to the metal housing, the tritium light source may, in fact, crack. In such a case, there is an immediate loss of brightness but no immediate escape of the gas outside of the metal housing into which it has been sealed. Under normal conditions, there is very low risk of contamination involved in opening packages and visually inspecting the sights in the dark to verify that they are all glowing. This is our standard procedure for all shipments received.

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b) Every two months, routine wipe test surveys (10 wipes in all) will be made of the warehouse (receiving table, storage shelves, light switch and door handle), loading area (ramp and cart/dolly) and office (desk and telephone). Since it is not economically feasible to maintain a liquid scintillation counter in-house, the samples will be sent to a laboratory for analysis. One or both of the following two companies, licensed to provide this service, will be used. RSA Laboratories (Hebron, Ct) or AME, Inc (Orangeburg, NY).

c) If there is evidence of degradation of package integrity such that the gun sights contained might possibly be damaged, the package will be set aside on the stainless steel table, and a wipe test will be made within three hours of receipt. The wipe sample will be sealed in a 20mL scintillation vial and shipped by overnight courier to Radiation Safety Associates, Inc., 19 Pendleton Drive, Hebron, CT (NRC License 06-30007-01) for immediate analysis by liquid scintillation counting. Radiation Safety Associates, Inc. would be notified by telephone that the sample is in transit, and they have committed to analyze the sample immediately upon receipt and to report the results to us by telephone and fax or e-mail. The damaged package will remain isolated until the results of the wipe test are received.

3. Regarding the connection between Octal Corporation, Klein & Hill and Meprolight:
We have rented warehouse and office space from Octal Corporation and have been granted unrestricted access to the facility on a 24-hour a day basis. A letter from Octal confirming this is attached herein. Klein & Hill serves as Meprolight's Corporate Office, and Mr. Reuven Klein of that firm is Secretary of the Board of Directors of Meprolight.

4. We acknowledge the error in the "Emergency Procedures – Damage or Fear of Contamination" in Item 10.e of the application. These instructions will be revised to state that packages must be assessed for contamination levels and must be marked and labeled according to DOT regulations. With regard to their transportation, since the probability of such incidents is quite low, and considering the requirements for transporting such items as normal form/unsealed tritium, we are presently negotiating with the above companies to provide additional services that will cover these instances. The procedures will clearly state the actions to be taken based on the outcome of those negotiations.

I hope that this information is sufficient for your needs and look forward to successful completion of the licensing process.

Sincerely,

Brad Fisher
Operations Manager

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OCTAL CORPORATION
125 Galway Place, Unit B
Teaneck, New Jersey 07666
Tel: (201) 862-1010
Fax: (201) 862-9100

4 April 2005

MEPROLIGHT, Inc.
C/O Klein & Hill
521 Fifth Avenue, 24th Floor
New York, NY 10175

ATTENTION: Mr. Brad Fisher

SUBJECT: Access to MEPROLIGHT Facilities

Dear Mr. Fisher,

In continuation to the agreement between MEPROLIGHT, Inc and OCTAL Corporation, MEPROLIGHT will operate a receiving and distribution facility located within the warehouse and distribution facility of the OCTAL Corporation. The MEPROLIGHT facility will include a separate (lock controlled) 200 square foot storage area within the larger OCTAL warehouse area and an additional 270 square feet of office space in the administrative portion of the OCTAL facility.

OCTAL Corporation agrees to allow 24 hour a day, 7 day a week access to the MEPROLIGHT facility by MEPROLIGHT personnel and their visitors. During normal working hours, MEPROLIGHT and/or their visitors will be admitted to OCTAL and the MEPROLIGHT facilities via the main entrance, through the receptionist.

Under this agreement, access to MEPROLIGHT during other than normal working hours will be via the main entrance with keys supplied to MEPROLIGHT for that purpose. It is understood that, as much as possible, off-hour visits should be reported in advance to avoid potential security problems.

Sincerely,

Dani Bar-David
President

EARNSHAW ENVIRONMENTAL, INC.

RSO Certification

Kerry R. Kinder

HAS SUCCESSFULLY COMPLETED A RADIATION SAFETY OFFICER COURSE

Subjects included were:

RSO Duties and Responsibilities
Radiation Quantities and Units
Regulatory Requirements
Dose/Shielding Requirements
Accidents/Storage
Biological Effects of Radiation/Risk
Transportation
Dosimetry
ALARA
Radiation Detection and Measurement
Operating and Emergency Procedures
Radioactive Waste Management
Record Keeping

Date of Training: 5/16/00
Location: Atlanta, GA
Certificate Number: 1011

Instructor: Keith Earnshaw, Ph.D.
Earnshaw Environmental, Inc.
11739 Pacesferry Dr.
Raleigh, NC 27614