ひろいー ココレビギ **OSRAM** SYLVANIA

Licensing Assistant Section Nuclear Materials Safety Branch US Nuclear Regulatory Commission, Region 1 475 Allendale Road King of Prussia, PA 19406-1415

Ref: License No. 20-30024-01

Gentlemen:

This is a request to amend the above license to add a new product line recently approved for distribution by amendment to our exempt distribution license number 20-30024-02E, copy enclosed. Please add the following to the license:

- 6. Byproduct Material

- B. Promethium 147
- 7. Chemical/Physical Form 8. Maximum Amount
 B. Electroplated promethium B. 40 millicuries per
 in a sealed glass capsule 6 facility and 160 millicuries total

The new product is a compact fluorescent lamp utilizing promethium-147 in the glow starter bottle, instead of krypton-85. The lamp, Type BFT-15, is manufactured by Toshiba Lighting & Technology, Tokyo, Japan and is imported by OSRAM SYLVANIA, Inc. for distribution in this country.

The promethium is in elemental form and is electroplated on the electrode of the vacuum sealed glow starter bottle in each lamp. The promethium is coated with electroplated nonradioactive nickel. The maximum quantity of Pm-147 authorized per lamp is 500 nanocuries.

The proposed use is the same as for our licensed products containing krypton-85. There are no procedural changes affecting radiation protection. As with our lamps containing krypton-85, the new lamp, either individually or in bulk quantities, does not present a radiation hazard to workers. The maximum measured radiation level, at one centimeter from a lamp containing promethium-147, cannot be distinguished from ambient background.

If there are any questions on the above or enclosed or if you require additional information please contact me at the address or telephone number shown below. telephone extension is 6642. I may also be reached at (914) 635-8698.

Enclosed is a check for the amendment fee in the amount of \$360.

Very Truly Yours,

Alan H. Jones

Corporate Radiation Safety Officer

Enclosure

cc: P. Feltri, Danvers, MA R. Gray, Danvers, MA

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OSRAM SYLVANIA INC. 201 Charles Street Maybrook, NY 12543 Telephone (914) 427-5599