Silvania Electric, O: n Corporation L&L300 Products, Inc.: has a license 030-33084 OSRAM 040-08075 31-235/5-01E 030-33084 SYLVA 578-1088 030-22294 03214 SYLVA elred: 7-31-76 Expires: 3/31/96 L&L300 February 8, 1993



February 8, 1993

20-30024-01

Licensing Assistant Section Nuclear Materials Safety Branch US Nuclear Regulatory Commission, Region 1 030-34371 475 Allendale Road King of Prussia, PA 19406-1415

Gentlemen:

Enclosed is our application for a radioactive materials license for certain OSRAM SYLVANIA INC. facilities in nonagreement states. Four separate points of possession are involved. Three are located in Region 1 and one is in Region 3. The proposed licensed activity is to receive and store products containing radioactive material for transfer to persons who are exempt from licensing requirements, pursuant to 10 CFR 32.15. These products are manufactured or imported by OSRAM Corporation, Montgomery, NY for exempt distribution under its USNRC License No. 31-23515-01E and transferred to OSRAM SYLVANIA, Inc.

OSRAM SYLVANIA INC. is a corporation recently formed as a result of the purchase of the entire stock of GTE Products Corporation by OSRAM Acquisition Corporation together with Siemens Corporation. It is expected that within a few months OSRAM Corporation's North American operations, located in Maybrook and Montgomery, New York will be merged into OSRAM SYLVANIA, Inc. At that time an amendment to OSRAM Corporation's USNRC "E" license will be requested to reflect the change.

Please direct all correspondence concerning this application to the undersigned, currently located at 110 Braken Road, Montgomery, New York 12549.

Enclosed is a check for the application fee in the amount of \$540.

Very Truly Yours,

Centre Non

Deirdre J. Wilson Regulatory Compliance Officer

Enclosures

Depart Fred Sciences La Brit

OSHAM SYLVATILA INC. 100 Endicott Street. Darvers MA 01923. Telephone (508) 777-1900.

117739 FEB A .

## OFFICIAL RECORD COPY ML 10

NRC FORM 313 U.S. NUCLEAR REGU	LATORY COMMISSION	APPROVED BY OMB NO. 3150 0120	
(† 122). 19 (1 ⊫ 20) 122 - 133 14 197) aventek:			
APPLICATION FOR MATERIAL LICENSE		RECORDS MANAGEMENT BRANCH (MNBB 7714- U.S. NUCCHAR REGULATORY COMMISSION, WASHINGTON DC 2055 AND TO THE PAPERWORK REDUCTION PHOJECT (3150 0120), DEFICE OF MANAGE MENT AND BUDGET, WASHINGTON, DC 20203	
INSTRUCTIONS SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR D THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW		FOR COMPLETING APPLICATION. SEND TWO COPIES OF	
APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH	IF YOU ARE LOCATED	N	
DIVISION OF INCUSTRIAL AND MEDICAL NUCLEAR SAFETY OFICE OF NUCLEAR MATHNIA: SAFETY AND SAFEGUARDS U.S. NUCLEAR NEOLATORY COMMISSION WASHINGTON: DC ZRAN	ILLINOIS INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO MATEHIALS LICENSING SECTION U.S. NUCLEAR REGULATORY COMMISSION, REGION III		
ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS	GLEN ELLYN, IL 60127	ATORY COMMISSION REGION III	
I TOUR ARE LOCATED IN	ARKANSAS, COLORAD	O, IDAHO, KANSAS, LOUISIANA, MONTANA, NEBRASKA	
FORMECTICUT DELAWARE DISTRICT DE COLUMBIA MAINE MARVLDAND. MASBACHUBETTS NEW HAMPSHIRE, NEW JERSEY, NEW YORK, PENNSYLVANIA, HHODE ISLAND DR VERMONT, SEND APPLICATIONS TO	NEW MEXICO, NORTH DAKOTA, OKLAHOMA, SOUTH DAKOTA, TEXAS, UTAH, OR WYDMING, SEND APPLICATIONS TO MATERIAL RADIATION PROTECTION SECTION U S NUCLEAR REGULATORY COMMISSION, REGIUM IV 611 RYAN, PLAZA DRIVE, SUITE 400 APLINGTON, TX 70011 800 ALASKA, ARIZONA, CALIFORNIA, HAWAII, NEVEDA, OHEGON, WASHINGTON		
(1/1%);14/2 А5315ТАНЧ 54С 1104 ЧЛЛСЦЕАН МАЧЕНАЦ5 SAFETT ВНАНСН ЧЛЛСЦЕАН НЕОЦАТОНЧ СОМИЛ5510А (НЕОГОН) ЧЛА ЦЕНСАЦЕ КЛАО РЛАССЕ РАЦБЯА РА 19645 1415			
ALABAMA FLORIDA GEORGIA, KENTUCKY, MIBBISSIPPI, NORTH CAROLINA	AND US TERRITORIES	AND PUBSESSIONS IN THE PACIFIC, SEND APPLICATIONS	
PUERTO RICO, BUUTH CARDLINA, TENNESSEE, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, BEND APMICATIONS TO HUCLEAR M., CHIALS SAFETY SECTION U.S. NUCLEAR REGULATORY COMMISSION, REGION II	NJCLEAR MATEHIALS SAFETY SECTION U.S. HUCLEAR REGULATORY COMMISSION REGION V 1450 MARIA LANI MALNUT CREEN, CA SHRE SEE		
- A STANTIA STREET & 7, SUITERNIE - ATLANTA GA 1012 - PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLE	! 1		
MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURIS	DICTIONS		
- THIS IS ARE APPLICATION FOR ICRece appropriate item)	2 NAME AND MAILING ADDRESS OF APPLICANT <i>finclut<del>es</del> Zip Code:</i>		
A NEW LICENSE B AMENOMENT TO LICENSE NUMBER	OSRAM SYLVANIA INC.		
" RENEWAL OF LICENSE NUMBER	100 Endicott Street		
,	Danvers	s, MA 01923	
- NAME OF PERSON TO HE CONTACTED ABOUT THIS APPLICATION		TELEPHONE NUMBER	
Alan H. Jones		(914) 635-8698	
. IBM/T ITEMS 5 THROUGH IT ON B 5 + IT PAPER. THE TYPE AND SCOPE OF INFORMATIO HADIOACTIVE MATERIAL	N TO BE PROVIDED IS DESCR	IRED IN THE LICENSE APPLICATION GUIDE	
Heliosoft and Toolar			
a fearing and mean multiple to chemical and or physical form, and comparing mount of a flood to consistent of any one time.	6 PURPOSEISI FOR WH	ICH LICENSED MATERIAL WILL BE USED	
		ICH LICENSED MATERIAL WILL BE USED	
WETER WEITER (WALLES ALSON SHELL FOR RADIATION SAFETY PROGRAM AND THEIR		DUALS WORKING IN OR FREQUENTING RESTRICTRED AREAS	
WERE WELE (WANNAME) IT BUY ONE THE NOTISTOLIALISE RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR THAINING AND FEREE SYCE	B TRAINING FOR INDIVID 10 RADIATION SAFETY P	DUALS WORKING IN OR FREQUENTING RESTRICTRED AREAS	
AFEE WE THE FROM THE AND CHETCHAL FRECUPING THIS CENTIFICATION ON BEHALF OF THE	B THAINING FOR INDIVID 10 RADIATION SAFETY P 12 LICENSEE FEES (See Th FEE CATEGORY 3P ALL STATEMENTS AND REPRI- 14 APPLICANT NAMED IN 175	DUALS WORKING IN OR FREQUENTING RESTRICTALD AREAS ROGRAM II CFR 1/0 and Section 1/2:311 AMOUNT ENCLOSED I 540 ISENTATIONS MADE IN THIS APPLICATION ARE M 2 CERTIFY THAT THIS APPLICATION IS	
AF-F WE LE FRANKET BEAN OF THE MUNICULATION RESPONSIBLE FOR BADIATION SAFETY PROGRAM AND THEIR THANKET AND FREE SCE TACE, "FES AND EDUPMENT TACE," INS AND EDUPMENT TO AS'E MARAGEMEN" TO THE HIGHLIGHT MUNICULAR TO THE APPLICANT WITH TELE IN CODE OF FEDERAL REGULATION ON REHALF OF TH MEASING THE COMMENT WITH TELE IN CODE OF FEDERAL REGULATION ON REHALF OF TH MEASING THE COMMENT TO THE RES' OF THE REQULATION ON REHALF OF TH MEASING THE COMMENT WITH TELE IN CODE OF FEDERAL REGULATION ON REHALF OF TH MEASING THE COMMENT TO THE RES' OF THE REQULATION ON REHALF OF TH MEASING THE COMMENT TO THE RES' OF THE REQULATION OF REHALF OF TH MEASING THE COMMENT TO THE RES' OF THE REQULATION ON REHALF OF TH	B THAINING FOR INDIVID 10 RADIATION SAFETY P 12 LICENSEE FEES (See T FEE CATEGORY 3P ALL STATEMENTS AND REPRI- 14 APPLICANT NAMED IN IT- 15 22 0.3 M SA AND IMINAL OFFICE TO MARE A Y	DUALS WORKING IN OR FREQUENTING RESTRICTRED AREAS ROGRAM G CFR 120 and Section 120 200 I AMOURT J ENCLOSED I 540 ESENTATIONS MADE IN THIS APPLICATION APE IN 2 CERTIFY THAT THIS APPLICATION IS THAT ALL INFORMATION CONTAINED HEREIN.	
AF-F WE TO FRANCE AND AND AND AND THE APPLICANT UNDERSTANDS THAT AND AND THERE AND AND THERE THAT AND AND THERE AND	B THAINING FOR INDIVID 10 RADIATION SAFETY P 12 LICENSEE FEES (See T FEE CATEGORY 3P ALL STATEMENTS AND REPRI- 14 APPLICANT NAMED IN IT- 15 22 0.3 M SA AND IMINAL OFFICE TO MARE A Y	DUALS WORKING IN OR FREQUENTING RESTRICTRED AREAS ROGRAM G CFR 120 and Section 120 200 I AMOURT J ENCLOSED I 540 ESENTATIONS MADE IN THIS APPLICATION APE IN 2 CERTIFY THAT THIS APPLICATION IS THAT ALL INFORMATION CONTAINED HEREIN.	
MET WE LE FRANKET IT ANY ONE THE MUNUTIONALIS. BESPONSIBLE FOR BADIATION SAFETY PROGRAM AND THEIR THANNING AND ERFERNING FACS, THES AND EDUPMENT I SETTICATION MUNUTION THE SECONDARY THE APPLICANT UNDERSTANDS THAT I SETTICATION MUNUTION THE SECONDARY THE APPLICANT UNDERSTANDS THAT I SETTICATION OF THE APPLICANT THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CENTIFICATION ON BEHALF OF TH PHERAPIC IN COMPACT TO THE SECONDARY OF ADDIES CENTIFICATION ON BEHALF OF TH PHERAPIC IN COMPACT TO THE SECONDARY OF ADDIES AND BELLION IN ANY OF AND COMPACT TO THE SECONDARY OF ADDIES AND BELLION IN ANY OFFICIES CONFIDENTS WITH THE FRANCOMEDGE AND BELLIONS IN ANY OFFICIES CONFIDENTS OF THE UNITED STATES AS TO ANY MATTER WITH	B THAINING FOR INDIVID 10 RADIATION SAFETY P 12 LICENSEE FEES (See T 12 LICENSEE FEES (See T 14 LICENSEE FEES (See T 14 LICENSEE FEES (See T 15 LICENSEE FEES (See T 15 JURISDICTION 15 JURISDICTION 15 JURISDICTION TITLE SOB REGU	DUALS WORKING IN OR ERECULENTING RESTRICTIED AREAS ROGPAM	
Met we te promoter a any one the Minumpitation allow and the angle of	B THAINING FOR INDIVID 10 RACIATION SAFETY P 12 LICENSEE FEES (Son T FEE CATEGORY 3P ALL STATEMENTS AND PEPE 14 APPLICANT NAMED IN IT 15 32 30, 34 35, AND 40 AND 14 INTS JURISDICTION TITLE	DUALS WORKING IN OR ERECULENTING RESTRICTIED AREAS ROGPAM	
Met we te provide te any one the Minutolialis. BISPOASIBLE FOR BADIATION SATETY PROGRAM AND THIR THANKLIAND FREE SCI TATS, THE AND FREE SCI TATS, THE AND FREE SCI TATS, THE AND FREE SCI TATS, THE AND FREE SCI THE APPLICANT WHEN THE APPLICANT UNDERSTANDS THAT I B SING UPLON THE APPLICANT THE APPLICANT AND ANY OBJECTS, FREE UTING, THIS CENTIFICATION ON BEHALF OF TH PHEFARTE SCICAL TO THE REST OF THE MOVIED OF AND BELLS WARNING TO COMMENT WITH TITLE TO CODE OF FEDERAL REGULATION ON BEHALF OF TH PHEFARTE SCICAL TO THE REST OF THE UNITED BEAT TO BEHALF OF TH WARNING, TA US & SECTION TOT AT OF ANY OF THE UNITED STATES AS TO ANY MATTER WITH WARNING THE CERTIFYING (HAICEN WARNING CERTIFYING (HAICEN WITH THE OF THE AND COMMENTATION AND THE UNITED STATES AS TO ANY MATTER WITH WARNING CERTIFYING (HAICEN TYPED PRINTED NAME MILLIANT AND SUMMED TO THE AND THE UNITED STATES AS TO ANY MATTER WITH WARNING CERTIFYING (HAICEN TYPED PRINTED NAME MILLIANT AND SUMMED TO THE SUMMED AND THE UNITED STATES AS TO ANY MATTER WITH WARNING CERTIFYING (HAICEN TYPED PRINTED NAME	B THAINING FOR INDIVID 10 RADIATION SAFETY P 12 LICENSET FEES (See T 12 LICENSET FEES (See T 14 APPLICANT NAMED IN IT: 15 20 34 36 AND 40 AND 14 APPLICANT NAMED IN IT: 15 JURISDICTION TITLE SOB REGU OFF I	DUALS WORKING IN OR ERECULENTING RESTRICTIED AREAS ROGPAM	
Met we te promoter a any one the Minumpitation allow and the angle of	B THAINING FOR INDIVID 10 RADIATION SAFETY P 12 LICENSET FEES (See T 12 LICENSET FEES (See T 14 APPLICANT NAMED IN IT: 15 20 34 36 AND 40 AND 14 APPLICANT NAMED IN IT: 15 JURISDICTION TITLE SOB REGU OFF I	DUALS WORKING IN OR ERECULENTING RESTRICTIED AREAS ROGPAM	
MARK DE LE LEADERST DE ANG LA LEADERST PROGRAM AND THEIR THANNES AND EREST SET TATS, THE AND EREST SET TATS, THE AND EREST SET TATS, THE AND EDURATEST TATS, THE AND EDURATEST THANKS AND	B THAINING FOR INDIVID 10 RADIATION SAFETY P 12 LICENSET FEES (See T 12 LICENSET FEES (See T 14 APPLICANT NAMED IN IT: 15 20 34 36 AND 40 AND 14 APPLICANT NAMED IN IT: 15 JURISDICTION TITLE SOB REGU OFF I	DUALS WORKING IN OR FREQUENTING RESTRICTRED AREAS ROGRAM IF CFR 170 and Section 170 211 I AMOUNT I ENCLOSED & 540 ISENTATIONS MADE IN THIS APPLICATION APE M 2 CERTIFY THAT THIS APPLICATION IS THAT ALL INFORMATION CONTAINED HEREIN VILLEFULLY FALSE STATEMENT OR REPRESENTATION I DATE LATORY COMPLICATION 2/8/93 CER	
Methodical is in spannant of any one in a Ministrictical is in SPOASHIE FOR RADIA TION SATETY PROGRAM AND THEIR THANKIE AND FREE SEE TACE, THES AND EDUPMENT TACE, THES AND EDUPMENT TO ASS'E MARAGEMENT TO HAVE CATTON WAN OF CONTINUES IN BURNAME THE APPLICANT UNDERSTANDS THAT I RECENT OF AND ANY OFFICIAL FREE UTING, THIS CENTIFICATION ON REHALF OF TH PREFEARTER STORMETS WITH TELE VO CODE OF FEDERAL REGULATIONS PARTS 3 IS THE AND CORRECT TO THE REST OF THE UNDERSTANDED THAT IS MARAGEMENT OR AGENCY OF THE UNDERSTANDED AND BELTH MARAGEMENT OF AGENCY MARAGEMENT OF AGENCY OF THE OFFICIAL AND THE AGENCY MARAGEMENT OFFICIAL AGENCY MARAGEMENT OFFICIAL AGENCY MARAGEMENT OFFICIAL AGENCY MARAGE	B THAINING FOR INDIVID 10 RADIATION SAFETY P 12 LICENSET FEES (See T 12 LICENSET FEES (See T 14 APPLICANT NAMED IN IT: 15 20 34 36 AND 40 AND 14 APPLICANT NAMED IN IT: 15 JURISDICTION TITLE SOB REGU OFF I	DUALS WORKING IN OR ERECULENTING RESTRICTIED AREAS ROGPAM	

1 + 1

į

ÓSRAM SYLVANIA INC. 100 Endicott Street Danvers, MA 01923 License Application Attachment A Page: 1 of 4

Item 3 - Addresses Where Licensed Material Will be Possessed

- (1) 105 Andover Street Danvers, MA 01923
- (2) 3950 Venture Court Columbus, OH 43228
- (3) 7485 Industrial Boulevard Allentown, PA 18106
- (4) 215 Beaver Drive Dubois, PA 15801

Item 5 - Radioactive Material

- a. Element and mass number: Krypton-85
- b. Chemical and/or physical form: gas
- c. Maximum amount possessed at any one time:

100 millicuries at each licensed facility, for a total of 400 millicuries

Item 6 - Purpose For Which Licensed Material Will be Used

Krypton-85 is used as a filling gas in glow switches and arc tubes incorporated into compact fluorescent lamps, metal halide discharge lamps and lamp starters as an aid in starting and/or operation.

These lamps and starters are manufactured or imported by OSRAM Corporation, pursuant to USNRC License No. 31-23515-01E (Attachment B), for distribution to persons exempt from licensing.

Each facility listed in Item 3, above, is a distribution warehouse where the licensed finished product, prepackaged in individual packages and overpacked in larger cartons, will be received from OSRAM Corporation. The product will stored intermingled with nonradioactive products in accordance with normal consumer product warehouse procedures, pending further distribution to customers.

There will be no routine handling of the finished product other than in the prepackaged state. In many instances outer cartons will be relabelled and shipped to customers or secondary distribution warehouses without being opened. When necessary, outer cartons will be opened and the packaged product removed to fill smaller orders.

A computerized inventory system will track licensed product to insure that the license limit is not exceeded.

OSRAM SYLVANIA INC. 100 Endicott Street Danvers, MA 01923 lioactive Materials License Application Attachment A Page: 2 of 4

Item 7 - Individuals Responsible For Radiation Safety Program and Their Training

For the reasons detailed in Item 10, below, there is no need for a radiation safety program or special training for the persons involved. However, at each warehouse facility the individuals shown below will be responsible for compliance with USNRC regulations and the conditions of the radioactive material license:

- (1) 105 Andover Street Danvers, MA 01923 Responsible person: John Tucker, manager
- (2) 3950 Venture Court Columbus, OH 43228 Responsible person: Bill Rudge, manager
- (3) 7485 Industrial Boulevard Allentown, PA 18106 Responsible person: Claude Mickle, manager
- (4) 215 Beaver Drive Dubois, PA 15801 <u>Responsible person</u>: Jim Hardon, foreman

The above individuals will receive the following written information prior to assuming their responsibilities:

- 1. Overview of responsibilities;
- 2. Regulatory and license requirements;
- 3. Inventory requirements pertaining to the license limit;
  - a. Activity limit;
  - b. Limit in terms of number of items;
- 4. Pertinent information on products containing radioactive material;
- 5. Name and phone number of corporate contact for questions or information pertaining to the license, regulations or the licensed product.
- 6. Copies of the license, applicable regulations and "Notice to Employees" (Form NRC-3).

Item 8 - Training For Individuals Working In or Frequenting Restricted Areas

Not applicable, no areas within the facilities listed in Item 3, above, are restricted per 10 CFR 20.3(a)(14).

OSRAM SYLVANIA INC.

100 Endicott Street Danvers, MA 01923 Radioactive Materials License Application Attachment A Page: 3 of 4

## Item 9 - Facilities & Equipment

The following is a description of each facility listed in Item 3, above:

168,000 square feet

24 hours by ADT

Full sprinkler system

(1) 105 Andover Street Danvers, MA 01923 (508) 750-2910

Warehouse Capacity:177,915 square feetFire protection:Full sprinkler systemSecurity & fire monitoring:24 hours by ADT

(2) 3950 Venture Court Columbus, OH 43228 (614) 777-8500

> Warehouse Capacity: Fire protection: Security & fire monitoring:

(3) 7485 Industrial Boulevard Allentown, PA 18106 (215) 481-0393

Warehouse Capacity:201,600 square feetFire protection:Full sprinkler systemSecurity & fire monitoring:24 hours by ADT

(4) 215 Beaver Drive Dubois, PA 15801 (814) 375-5680

Warehouse Capacity:69,200 square feetFire protection:Full sprinkler systemSecurity & fire monitoring:24 hours by ADT

## Item 10 - Radiation Safety Program

Because of the form and quantity of the radioactive materia ivolved and the fact that the license exempt product containing the material will only be received and handled prepackaged in boxes, there is no need for a radiation safety program, including personnel monitoring and radiation surveys. The average Krypton-85 activity per lamp or starter model is 43 nanocuries, with a current licensed limit of 175 nanocuries. The maximum radiation level at one centimeter from an unpackaged lamp is 0.015 mrem/hr, with 0.012 mrem/hr measured at the surface of the individual lamp carton. The whole body radiation level in the vicinity of bulk cartons of such lamps is not distinguishable from ambient background.

OSRAM SYLVANIA INC. 100 Endicott Street Danvers, MA 01923 License Application Attachment A Page: 4 of 4

Item 11 - Waste Management

Due to the nature of the operation, there will be no radioactive waste normally generated. In the unlikely event of the breakage of a lamp, the extremely small quantity of krypton gas would quickly dissipate to the large volume atmosphere of the warehouse. However, occasionally lamps may be returned as defective. These lamps will be collected in an appropriate and labelled container and disposed of through a licensed radioactive waste disposal service pursuant to the applicable provisions of 10 CFR Parts 20 & 61.