

Appendix 8

Certification of Application/License Review  
for Part 32 Exempt Distribution Licenses

Amendment No.: NEW Mail Control No.: 022630  
License No.: 04-23959-01E Expiration Date: 2017  
Docket No.: 030-37553 Program Code: 03251  
Licensee Name: Solar Planet Inc., dba SUPRA TECHNOLOGIES  
Address: 986 Salvador Ave.  
Napa, CA 94558  
Action Type: New License   
New License/Licensee Renewal   
Product Transfer Report   
Amendment   
Termination

I certify that I have reviewed the licensee's request dated 9/24/07, as supplemented by any letters referenced in the license and in accordance with guidance provided by the Office of Nuclear Material Safety and Safeguards, appropriate Standard Review Plans and regulations, and the attached checklist.

REVIEWER	DATE
<u>A. Kirkwood</u>	<u>10/29/07</u>
REVIEWED BY	DATE
<u>A. Kirkwood</u>	<u>11/05/07</u>
PERSON SIGNING THE LICENSE	DATE

GENERAL COMMENTS: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Mail Control No.: 022630

32.14: CERTAIN ITEMS (30.15)

(a) Applicant satisfied general requirements in 30.33, 10 CFR Part 30 ✓

COMMENTS: CA Lic. No. 7669-28, expires 9/22/07

(b) Applicant submits sufficient information regarding product pertinent to evaluation of potential radiation exposure, including: \_\_\_\_\_

COMMENTS: \_\_\_\_\_

1. Chemical and physical form and maximum quantity of BPM in each product ✓

COMMENTS: Kr-85, 120 nCi (0.120 uCi), gas  
4.440 kilobecquerels

2. Details of construction and design of product ✓

COMMENTS: Picture diagram of typical product  
(H10) UV lamps

3. Method of containment or binding of BPM in product ✓

COMMENTS: Gas sealed in glass tube (lamps). Only  
pre-packaged product sold in US.

4. Procedures for prototype testing to demonstrate that the material will not become detached from the product or that BPM will not be released under severe conditions ✓

COMMENTS: Product in existence for ~30 yrs. Radium  
is a Osram Sylvania subsidiary - German manufacturer  
Same products distributed by US NRC Licensee?

5. Results of prototype testing N/A

COMMENTS: \_\_\_\_\_

6. Quality control procedures to be followed in the fabrication, and the quality control standards the product will be required to meet (§32.15) ✓

COMMENTS:

Need translation from German  
Gas certificate translated in 10/24/07, e-mail

- 7. Proposed method of labeling or marking each unit, except for timepieces or hands or dials containing H-3 or Pm-147 and it's container with the identification of the manufacturer or initial transferor and the BPM

COMMENTS:

Need labeling methods. See 10/24/07  
e-mail

- 8. For products with limits specified in 30.15, the radiation level and method of measurement

COMMENTS:

Need method of radiation level  
measurement See 10/29/07

- 9. Any additional information, studies, and tests regarding product safety

COMMENTS:

- (c) Each product will contain no more than the quantity of BPM specified for that product in 30.15

COMMENTS:

120 nCi (4.44 kilobecquerels)  
See gas supplier certification

32.14(1): Timepieces

Tritium is considered properly bound if no visible flaking and the total loss of H-3 does not exceed 5% of total H-3 when subjected to the following tests:

COMMENTS:

- 1. Vibration tests

COMMENTS:

- 2. Bending of hands or pointers over cylinder

COMMENTS:

3. Immersion tests \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

**32.40: Schedule A - Lock Illuminators**

Prototype testing for automobile lock illuminators must consist of the following tests: \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

1. 100 hours of accelerated weathering \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

2. Dropped onto concrete or iron from 3 feet 100 times \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

3. Vibration tests \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

4. Immersion in 30 inches of water for 24 hours to include a pressure (bubble) test \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_

5. After each test, must be examined for evidence of physical damage \_\_\_\_\_

COMMENTS: \_\_\_\_\_  
\_\_\_\_\_