

From: Anthony Kirkwood
To: leif vasstrom
Date: 10/02/2007 10:25:51 AM
Subject: RE: Supra Technologies HID lamps - Request For Additional Information

October 2, 2007

Mail Control No. 022630

Solar Planet, Inc., dba
SUPRA TECHNOLOGIES
ATTN: Mr. Leif Vasstrom,
Principal
986 Salvador Avenue
Napa, California 94558

**SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT
DISTRIBUTION LICENSE**

Dear Mr. Vasstrom:

This refers to your Application for Material License, NRC Form 313, dated September 24, 2007. In order to continue our review we find we need additional information as detailed in the following questions:

1) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Your letter dated September 24, 2007, with Enclosures, did not fully describe the construction and design of the product. Please submit:

- a) The dimensions and thickness of the quartz arc tube and the dimensions of the lamp its contained in.
- b) The materials used to fasten the quartz arc tube to the lamp.

2) Title 10, Code of Federal Regulations, Section 32.14(b)(3) [10 CFR 32.14(b)(3)] requires the method of containment or binding of the byproduct material in the product. In addition, 10 CFR 32.14(d)(1) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Your letter did not describe how the quartz arc tube is secured to the lamp fixture, such that it cannot become dislodged during normal usage. Please describe how the quartz arc tube is attached to the lamp body, such that, the byproduct material is securely contained in the product.

3) Title 10, Code of Federal Regulations, Section 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. You included in your letter manufacturers procedures, however, since they were in German, we could not review them. Please provide procedures in English describing tests, procedures, and results of testing performed on the lamp with the krypton-85 quartz arc tube installed to demonstrate that the byproduct material will not become detached from the product.

4) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. Your letter did not describe any labeling. Please submit drawings showing the locations of, and the wording to be used on each unit, such that, the initial distributor and the byproduct material are both indicated.

5) Title 10, Code of Federal Regulations, Section 32.14(c) requires that each product will contain no more than the quantity of byproduct material specified for that product in §30.15. You indicated in your letter that Radium ensures that the quantity of byproduct material specified for that product in §30.15, will not be

exceeded. Please provide procedures describing the measurement method and the frequency and method of calibration of the measurement device(s) Radium uses to ensure that the quantity of byproduct material specified for your product will not be exceeded.

6) Title 10, Code of Federal Regulations, Section 32.15(a)(1) requires that each person licensed under §32.14 shall maintain quality assurance practices in the manufacture of the part or product, and the installation of the part into the product. Please provide Radium's quality control procedures for the manufacture of the quartz arc tube and installation of the quartz arc tube into the lamp including procedures for testing and manufacturing check points during the manufacturing process, especially in regards to the installation of the quartz arc tube into the lamp.

7) You indicated in your application dated September 24, 2007, two addresses. Will both addresses be distribution points for your product? Which address should be the mailing address for Nuclear Regulatory Commission license communications.

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you and void the active control for your exempt distribution license. This action would be without prejudice to the re-submission of another application with the required information.

In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If you have any questions, please feel free to contact me at (301) 415-6140 or via electronic mail: www.ask@nrc.gov.

Sincerely,

/RA/

Anthony S. Kirkwood, Health Physicist,
State Agreements and Industrial
Safety Branch
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

Docket No. 030-37553
Mail Control No. 022630

CC: Duncan White; Linda Eusebio; Maureen Moriarty

Mail Envelope Properties (470254EF.D30 : 13 : 34940)

Subject: RE: Supra Technologies HID lamps - Request For Additional Information
Creation Date Tue, Oct 2, 2007 10:25 AM
From: Anthony Kirkwood

Created By: ASK@nrc.gov

Recipients	Action	Date & Time
covad.net lvasstrom (leif vasstrom)	Transferred	10/02/07 10:26 AM
nrc.gov LME CC (Linda Eusebio)	Delivered Opened	10/02/07 10:25 AM 10/02/07 11:09 AM
nrc.gov MXM1 CC (Maureen Moriarty)	Delivered Opened	10/02/07 10:26 AM 10/02/07 10:32 AM
nrc.gov ADW CC (Duncan White)	Delivered Opened	10/02/07 10:25 AM 10/02/07 12:15 PM
Post Office	Delivered	Route covad.net nrc.gov nrc.gov nrc.gov

Files	Size	Date & Time
MESSAGE	7228	Tuesday, October 2, 2007 10:25 AM
TEXT.htm	6886	

Options

Auto Delete: No
Expiration Date: None
Notify Recipients: No
Priority: Standard
ReplyRequested: No
Return Notification: None

Concealed Subject: No

Security:

Standard

To Be Delivered:

Immediate

Status Tracking:

Delivered & Opened