

SUPERIOR UV TECHNOLOGIES

(Solar Elements)
17 Centerview Drive
Shelton, CT 06484

06-23969-01
03037784

Q-5
MS-16

2008 JUL 28 AM 8:24

RECEIVED
REGION I

Division of Nuclear Materials Safety
US Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

July 24, 2008

Dear Betsy Ullrich,

This letter is in your response for your request dated July 16, 2008 for additional information regarding our application, control # 142490. First and foremost thank you for your guidance and time the other day. I will reference your points 1-10 below:

1. I understand that Superior UV Technologies as the initial importer will be considered by the NRC to be the initial manufacture/distributor and will be responsible for insuring our devices meet NRC requirements and that our company complies with NRC requirements.
2. We have setup a meeting this Tuesday July 29, 2008.
3. I agree that the authorized quantity will be "not to exceed 0.120 microcuries per lamp and 400 microcuries total."
4. Please see attached for a complete list of our products listed by 6 digit model number.
5. I confirm that we do not perform any gas filling but only receive finished lamps containing krypton-85.
6. I Robert Klem will be the RSO. I have completed a Radiation Safety Awareness course. See attached certificate. I am located at 17 Centerview Drive in Shelton, CT 06484. Nobody else will be authorized to handle the material.
7. Nobody else is employed by Superior UV Technologies and nobody else will be handling the licensed materials in any way.
8. I have developed a basic radiation safety program. See attached. I have also enclosed Radium's ISO certificate.
9. Superior UV Technologies will transport our licensed devices in accordance with DOT requirements. Our understanding is that there are

142490

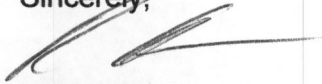
NMSS/RGNI MATER.ALS-002

no DOT requirements on sealed devices containing krypton-85 with a concentration at or below 2.7 microcuries per gram.

10. If Superior UV Technologies receives damaged devices we will dispose of them with an authorized radioactive broker.

I believe I have enclosed all the necessary information. Should there be any additional information needed I will address it at once. Thank you for your assistance and time.

Sincerely,



Robert Klem
Member
Superior UV Technologies
robertk@superioruv.com



SKU #	Item #	Description
100915	BSE400W+/230V/CI	400-500w 230v clip-in
100916	BSE400W+/230V/WL	400-500w 230v wire lead
100917	BSE500W/230V/PI	300-500w 230v plug-in
100918	BSE610W/230V/BL	610w 230v blade
100919	BSE630W/230V/PN	630w 230v pin
100920	BSE620W/230V/SB	620w 230v step base
100921	BSE650W/230V/PI	500-650w 230v plug-in
100922	BSE600W/230V/WL	500-650w 230v wire lead
100922b	BSE600W/230V/WL	500-650w 230v wire lead XL
100923	BSE700W/230V/PI	600-700w 230v plug-in
100924	BSE800W/230V/CI	800w 230v clip-in
100925	BSE1000W/230V/PI	800-1000w 230v plug-in
100926	BSE1000W/230V/WL	800-1000w 230v wire lead
100927	BSE1000W/380V/WL	1000-1200w 380v wire lead
100928	BSE1000W/230V/SB	1000-1400w 230v step base
100061	BSE1400W/230V/WL	1400w 230v wire lead
100929	BSE1510W/230V/BL	1510w 230v blade
100930	BSE1530W/230V/PN	1530w 230v pin
100931	BSE2000W/230V/WL	2000w 230v wire lead
100932	BSE2000W/380V/WL	2000w 380v wire lead
100932b	BSE2000W/380V/WL	2000w 380v wire lead XL

ORDERING INFORMATION

Phone: (888) LAMPS-123
Local #: (917) 699-8739
Fax: (800) 732-0522
Email: sales@superioruv.com

Certificate of Training

Awarded To

Robert Klem

Recognizing completion of 1 hour of specialized instruction in

Radiation Safety Awareness

July 22, 2008

Presented By

Radiation Safety Academy

A Division of Dade Moeller & Associates

481 N. Frederick Avenue Ste. 302

Gaithersburg, MD 20877



Alan Fellman Ph.D, CHP
Division Manager

SUPERIOR UV TECHNOLOGIES
17 Centerview Drive
Shelton, CT 06484

Radiation Safety Program

This program will be monitored by Robert Klem who is the RSO for Superior UV Technologies. He may be contacted 24 hours a day at (917) 699-8739.

No employees or other individual shall be permitted to handle the HID lamps in anyway until they have completed and passed a Radiation Safety Awareness program. In addition no person shall handle the HID lamps until they are instructed in the proper packing and handling techniques by the RSO.

All devices will be clearly marker as "contains kr-85".

All storage area will be appropriately marked "These lamps contain krypton-85 and are not to be handled except by authorized personnel". In addition all storage areas will be marked "In case of emergency contact Robert Klem (917) 699-8739".

Superior UV Technologies will annually review the NRC regulations and renew the licenses to ensure compliance.

Superior UV Technologies will conduct monthly inventory counts and submit an annual report of transfers to the NRC.

Superior UV Technologies will maintain records of all purchases and sales of licensed devices.

Superior UV Technologies will meet no less then once annually with our manufacture, Radium to review their quality controls and make sure they maintain their ISO certification.

In the event of an Emergency involving damage or fire to the inventory of HID lamps the RSO will contact the Radiation Safety Academy @ 301-990-6006 to asses the appropriate response and action. The academy will provide any necessary oversight, personnel and procedures in regards to our licensed products in an emergency.



DET NORSKE VERITAS

MANAGEMENT SYSTEM CERTIFICATE

Certificate No.: 13861-2007-AE-GER-TGA

This is to certify that

Radium Lampenwerk GmbH

**Dr.-Eugen-Kersting-Str. 6
51688 Wipperfürth**

has been found to conform to the Management System Standards

ISO 14001:2004 and ISO 9001:2000

This Certificate is valid for the following product or service ranges:

**Development, production and sales of
tungsten filament, gas discharge and UV/IR lamps**

Initial Certification date:

25.10.2001

This Certificate is valid until:

20.12.2010

*The audit has been performed under the
supervision of*

Thomas Ring
Lead Auditor



TGA-ZM-04-92-00
TGA-ZM-04-92-60

Place and date:

Essen, 20.12.2007

for the Accredited Unit:

DNV ZERTIFIZIERUNG UND UMWELTGUTACHTER GMBH

Nikolaus Kim
Management Representative

Lack of fulfilment of conditions as set out in the Certification Agreement may render this Certificate invalid.

DNV Zertifizierung und Umweltgutachter GmbH, Schnieringshof 14, 45329 Essen, Tel: +49 201 7296 300 Fax: +49 201 7296 333 - www.dnv.de/zertifizierung