

# SEIKO CORPORATION OF AMERICA

December 2, 2008  
Via Federal Express Overnight Service

Docket No. 03016033  
Control No. 142853

License No. 29-29080-01

Dennis R. Lawyer  
US Nuclear Regulatory Commission  
Commercial and R&D Branch  
Division of Nuclear Materials Safety  
Region I  
475 Allendale Road  
King of Prussia, PA 19406-1415

J-6  
MS-16

RECEIVED  
REGISTRY  
2008 DEC -3 AM 10:05

SUBJECT: SEIKO CORPORATION OF AMERICA, RESPONSE TO REQUEST FOR ADDITIONAL  
INFORMATION CONCERNING APPLICATION FOR AMENDMENT TO LICENSE,  
CONTROL NO. 142853

Dear Mr. Lawyer,

In response to your phone call of November 20, 2008 regarding Points 3a and 3b of your  
November 3, 2008 letter, I would like to add the following:

3a. I have no knowledge, nor do any current employees have any knowledge, of Seiko Corporation of America utilizing alternate disposal procedures, i.e., burying any waste or disposing of radioactive waste in the sanitary sewerage system, nor incinerating any waste. We did not generate any animal tissue waste. Liquid scintillation cocktails were used in our California location where we distributed and repaired our Jean Lassale line of watches. Our Jean Lassale line used Tritium for luminosity. Tritium was removed from our license in Amendment No. 3 dated May 6, 1998. We discontinued this product line in 1991 and closed the California location where we repaired the watches in 1996. The decommissioning was performed by PWN Environmental and they also arranged removal and disposal of the waste.  
I am enclosing copies of disposal records for our New Jersey location where we possessed and distributed PM-147.

3b. We have records of wipes from 1990 to present for our 1111 Macarthur Blvd., Mahwah, NJ location. I am enclosing two current reports. These reports include drawings of areas in the building where PM-147 might be found and specify the wipe locations. We never had any restricted areas and all of our product was manufactured outside of the US. We have records related to the provision of financial assurance for our California location, but none for New Jersey or any other state.

Please advise me of any further requirements in order to terminate this license. You may reach me at 201-512-3006 or [jmarione@seikousa.com](mailto:jmarione@seikousa.com)

Thank you for your assistance.

Yours truly,  
  
Joanne Marione, RSO  
Manager, Facilities & Administration

Cc: M. Marin  
T. Matsuda  
Encl.

FORM 540		RADIAC RESEARCH CORP.		SHIPPER'S NAME AND FACILITY BEINO CORP. OF AMERICA 1111 MacArthur Blvd. MAYFIELD, NJ 07054		SHIPPER'S I.D. NUMBER NA <input type="checkbox"/> COLLECTOR <input type="checkbox"/> PROCESSOR		7. FORM 540 AND 540A FORM 541 AND 541A FORM 542 AND 542A ADDITIONAL INFORMATION		PAGE 1 OF 1 PAGE(S) 1 PAGE(S) None PAGE(S) None PAGE(S)		8. MANIFEST NUMBER (Use this number on all correspondence pages) 10034-R	
UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST SHIPPING PAPER				US EPA ID No. NA		SHIPMENT NUMBER		9. CONTAINER - Name and Facility RADIAC RESEARCH CORP. 261 KENT AVENUE BROOKLYN, NY 11211		CONTACT JOSEPH SPEKTOR TELEPHONE (Include Area Code) 718 863 - 2233		DATE 9-17-08	
1. EMERGENCY TELEPHONE NUMBER (800) 424 - 8300 (Include Area Code)				CONTACT JOANNE MARONE		TELEPHONE NUMBER (Include Area Code) 201-828-5730		SIGNATURE - Authorized consignee acknowledging waste received <i>Ken Fort</i>		TD. CERTIFICATION This is to certify that the herein named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation. This also certifies that this material is classified, packaged, marked, and labeled and is in proper condition for transportation and disposal as described in accordance with the requirements of 10 CFR Parts 20 and 61, or equivalent state regulations.		DATE 9-17-08	
2. IS THIS AN "EXCLUSIVE USE" SHIPMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO				3. TOTAL NUMBER OF PACKAGES IDENTIFIED ON THIS MANIFEST 203300		4. CARRIER - Name and Address RADIAC RESEARCH CORP. 261 KENT AVE. BROOKLYN, NY 11211 Truck # <i>RP22213</i> Trailer #		EPA ID NUMBER NY000172261		SHIPPING DATE 9/16/08		TELEPHONE (Include Area Code) 718 863 - 2233	
5. DOES EPA REGULATED WASTE REQUIRE A MANIFEST ACCORDING TO THIS REGULATION? If "Yes," provide Manifest Number <i>203300</i>				EPA MANIFEST NUMBER 203300		CONTACT HECTOR MARTOS		SIGNATURE - Authorized carrier acknowledging waste received <i>Hector A. Martos</i>		DATE 9/16/08		AUTHORIZED SIGNATURE <i>Joanne Marone</i>	
11. U.S. DEPARTMENT OF TRANSPORTATION DESCRIPTION (including proper shipping name, hazard class, UN ID number, and any additional information)				12. DOT LABEL "RADIOACTIVE"		13. TRANSPORT INDEX		14. PHYSICAL AND CHEMICAL FORM		15. INDIVIDUAL RADIONUCLIDES		16. TOTAL PACKAGE ACTIVITY MBq	
Radioactive material, Type A package, 7, UN 2915				White-I		NA		SOLID OXIDE		Pu-247		3.2180E+03 (8.7000E+01)	
17. DAW - COMPACTIBLE - WATCH COMPONENTS (DIALS, HANDS, FACES)												NA	
												30 LBS; 1.35 FT3	
												10034-01	
												TYPE A PACKAGE	

<p><b>Note 1:</b> Describe/Describe Codes. For each disposal waste requiring a disposal in approved treatment/evaluation site, the material code must be identified by "OP".</p> <p>1. Wooden Box or Crate 2. Metal Box 3. Plastic Drum or Pail 4. Metal Drum or Pail 5. Metal Tank or Liner 6. Concrete Tank or Liner 7. Polyethylene Tank or Liner 8. Fiberglass Tank or Liner</p> <p>9. Demolition 10. Gas Cylinder 11. PPE, Unpackaged Waste 12. Unpackaged Components 13. High Integrity Container 14. Other, Describe in Item 6, or additional page 15. Other, Describe in Item 6, or additional page</p>	<p><b>Note 1A:</b> Process Requested</p> <p>SR Corrosion SR Sludge Refining DI Direct Incineration SI Solid Incineration D Decom O Other in Other Material M Material T Trans-Ship L Liquid for Incineration O Oil for Incineration O Other (describe)</p>	<p><b>NOTE 2:</b> Waste Descriptor Codes. (Choose up to three which pertain to this waste.)</p> <p>20. Chemical 21. Inorganic (or Ash) 22. Soil 23. Gas 24. Oil 25. Aqueous Liquid 26. Fiber Media 27. Mechanical Filtr 28. EPA or State Hazardous</p> <p>29. Demolition Rubble 30. Gas/Liquid Exchange Media 31. Arsenic Exchange Media 32. Mixed Bed Ion Exchange Media 33. Contaminated Equipment 34. Organic Liquid (except pH) 35. Oil/Water or Leachate 36. Sealed Source/Device 37. Paint or Plating</p>	<p><b>NOTE 2A:</b> Disposal/Disposition Site</p> <p>B Barrerall Waste Management E Emeritus R Richmond, WA PR Process and Return O Other</p>	<p><b>Notes:</b> Solidification and Stabilization Matrix Code. (Choose up to three which pertain to your waste. For each material, the disposal site and stability requirements, the material code must be followed by "SS" and the SS code for the disposal site must also be identified in Item 13. Code 100=NONE REQUIRED)</p> <p>Solidification 01 Cement 02 Concrete 03 Bitumen 04 Vinyl Ester Resins 05 Other, Describe in Item 13, or additional page 100. None Required</p>
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November 19, 2008

Ms. Joanne Marione  
Seiko Corporation of America  
1111 Macarthur Boulevard  
Mahwah, NJ 07430

Dear Joanne:

Enclosed is a copy of my November 2008 monthly survey report, which was sent today to Carlos Pulley of Coserv-Mahwah. This month, in addition to the survey of the repair shop, the 4<sup>th</sup> quarter survey of certain other storage and handling areas was also performed.

You will note that this month there were no wipe results over the recommended clean-up limit and no radiation levels over ambient background.

If there are any questions on the reports, please let me know. I have also enclosed my invoice.

Sincerely,



Alan H. Jones  
President

Enclosures

November 19, 2008

Mr. Carlos Pulley  
Coserv Division  
Seiko Corporation of America  
1111 Macarthur Boulevard  
Mahwah, NJ 07430

Dear Carlos:

Enclosed are the results of my Radiation Protection Survey of the Repair Department for the month of November 2008 performed on November 19, 2008. It consisted of a radiation level survey of use and storage locations and a wipe survey of surfaces in the same areas for removable contamination.

The results of the radiation survey revealed no eye or whole body radiation levels over ambient background. The results of the wipe survey showed no surface with removable surface contamination levels over the recommended limit of 222 dpm/100 cm<sup>2</sup>.

If there are any questions on the above or enclosed please contact me at (845) 635-8698. Thank you for your cooperation.

Sincerely,



Alan H. Jones  
President

Enclosure

171 Traver Road  
Pleasant Valley, NY 12569

# **RADIATION PROTECTION SURVEY**

**Facility:** Seiko Corporation of America

Coserv Division

Mahwah, NJ 07430

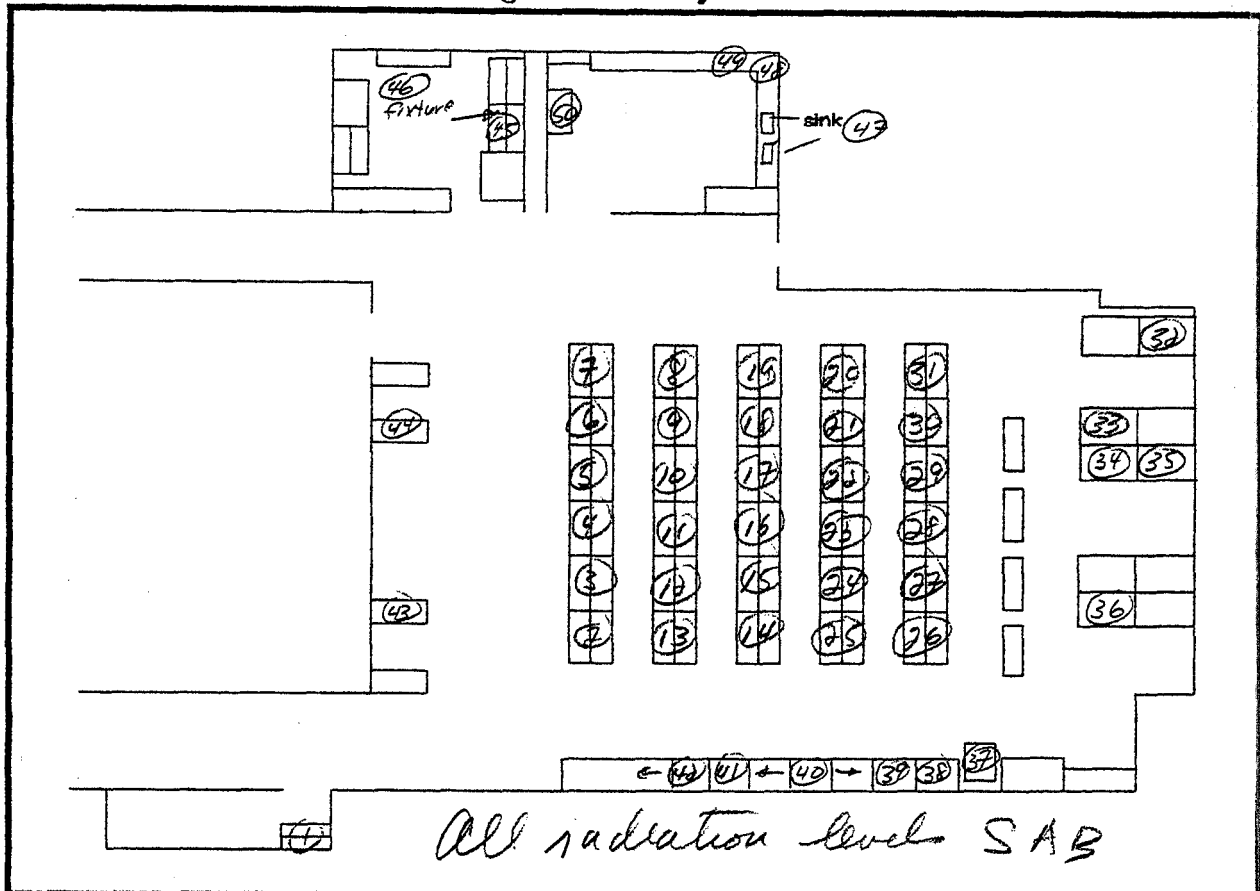
**Survey Date:** November 19, 2008

**By:** Alan R. Jones

**Survey Location:** Repair Department

**Type of Survey:** Radiation Level & Surface Contamination

**Diagram of Surveyed Area**



**Survey Equipment Used/Date Calibrated:** Ludlum model 14C w/44-7 probe

○ = Wipe Location

Calibrated: 8/26/08

△ = Air Sample Location

□ = Other ( )

Radiation levels in mR/hr unless otherwise specified

SAB = Same as ambient background of: 0.01 - 0.02 mR/hr

= > 100 dpm/100 cm<sup>2</sup> and cleaned to acceptable levels

171 Traver Road  
Pleasant Valley, NY 12569

# **RADIATION PROTECTION SURVEY**

Facility: Seiko Corporation of America  
Coserv Division  
Mahwah, NJ 07430

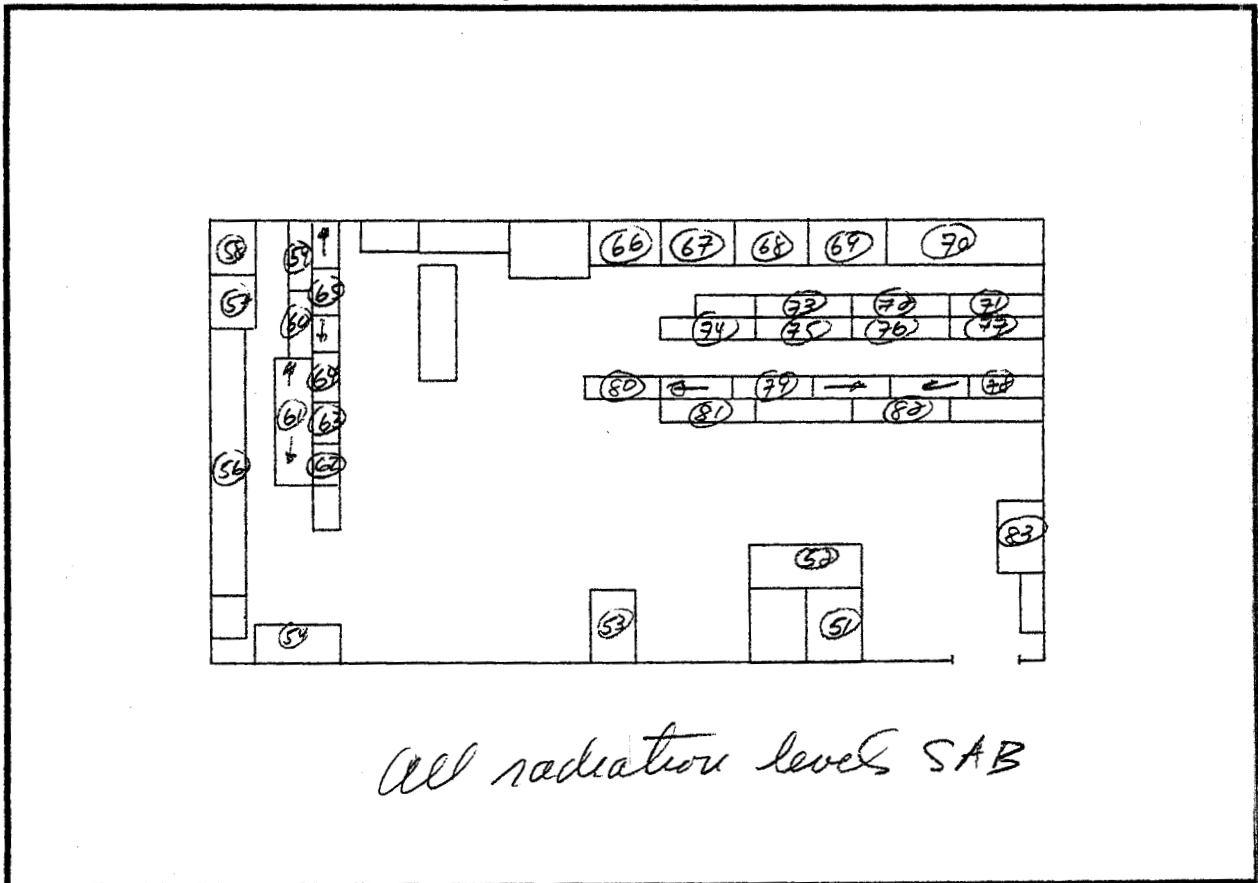
Survey Date: November 19, 2008

By: Alan D. Jones

Survey Location: Material Room

Type of Survey: Radiation Level & Surface Contamination

**Diagram of Surveyed Area**



Survey Equipment Used/Date Calibrated: Ludlum model 14C w/44-7 probe

○ = Wipe Location

Calibrated: 8/26/08

△ = Air Sample Location

□ = Other ( )

Radiation levels in mR/hr unless otherwise specified

SAB = Same as ambient background of: 0.01 - 0.02 mR/hr

= > 100 dpm/100 cm<sup>2</sup> and cleaned to acceptable levels

171 Traver Road  
Pleasant Valley, NY 12569

# **RADIATION PROTECTION SURVEY**

Facility: Seiko Corporation of America  
Coserv Division  
Mahwah, NJ 07430

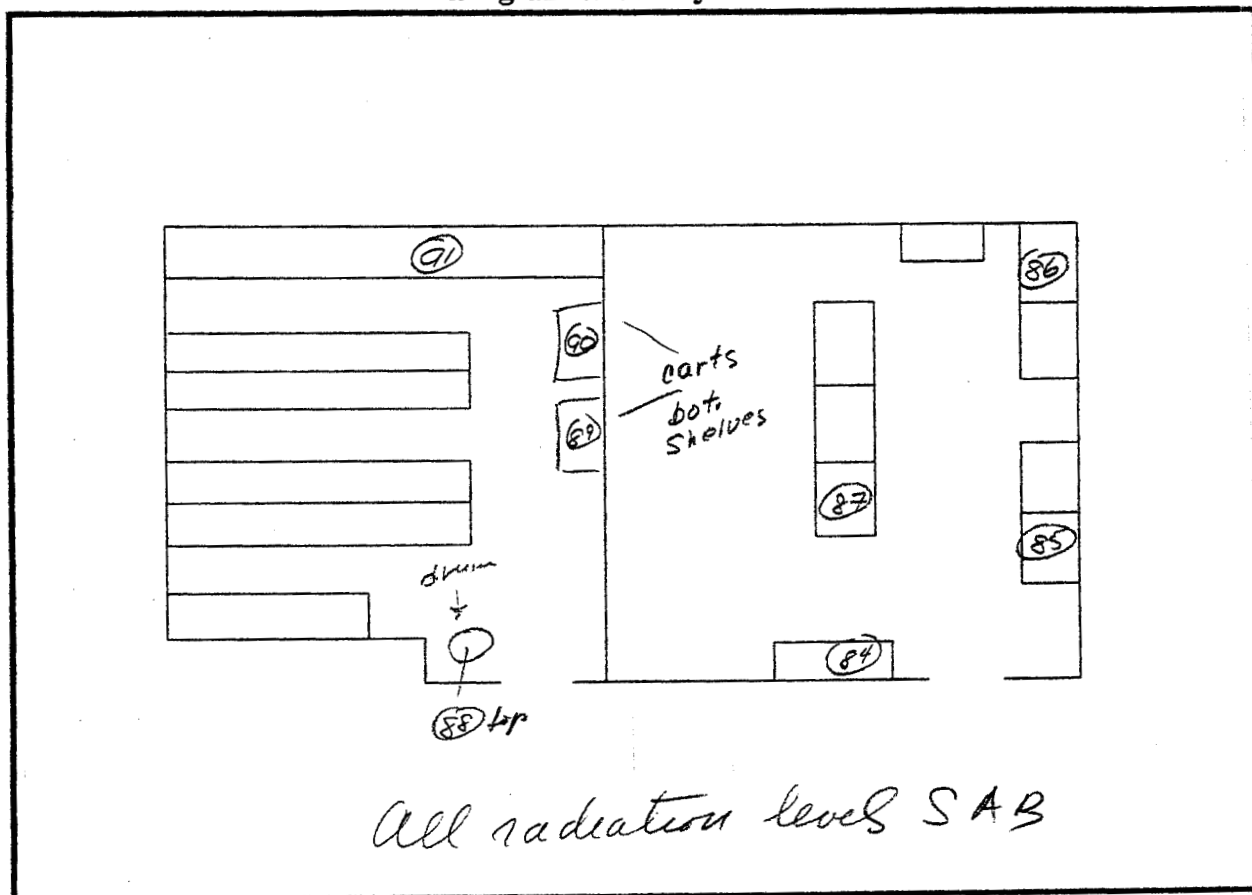
Survey Date: November 19, 2008

By: Alta H. Jones

Survey Location: Dummy Watch Storage Room/Printing Room

Type of Survey: Radiation Level & Surface Contamination

**Diagram of Surveyed Area**



Survey Equipment Used/Date Calibrated: Ludlum model 14C w/44-7 probe

○ = Wipe Location

Calibrated: 8/26/08

△ = Air Sample Location

□ = Other ( )

Radiation levels in mR/hr unless otherwise specified

SAB = Same as ambient background of: 0.01 - 0.02 mR/hr

= > 100 dpm/100 cm<sup>2</sup> and cleaned to acceptable levels



171 Traver Road  
Pleasant Valley, NY 12569

# **RADIATION PROTECTION SURVEY**

**Facility:** Seiko Corporation of America  
Coserv Division  
Mahwah, NJ 07430

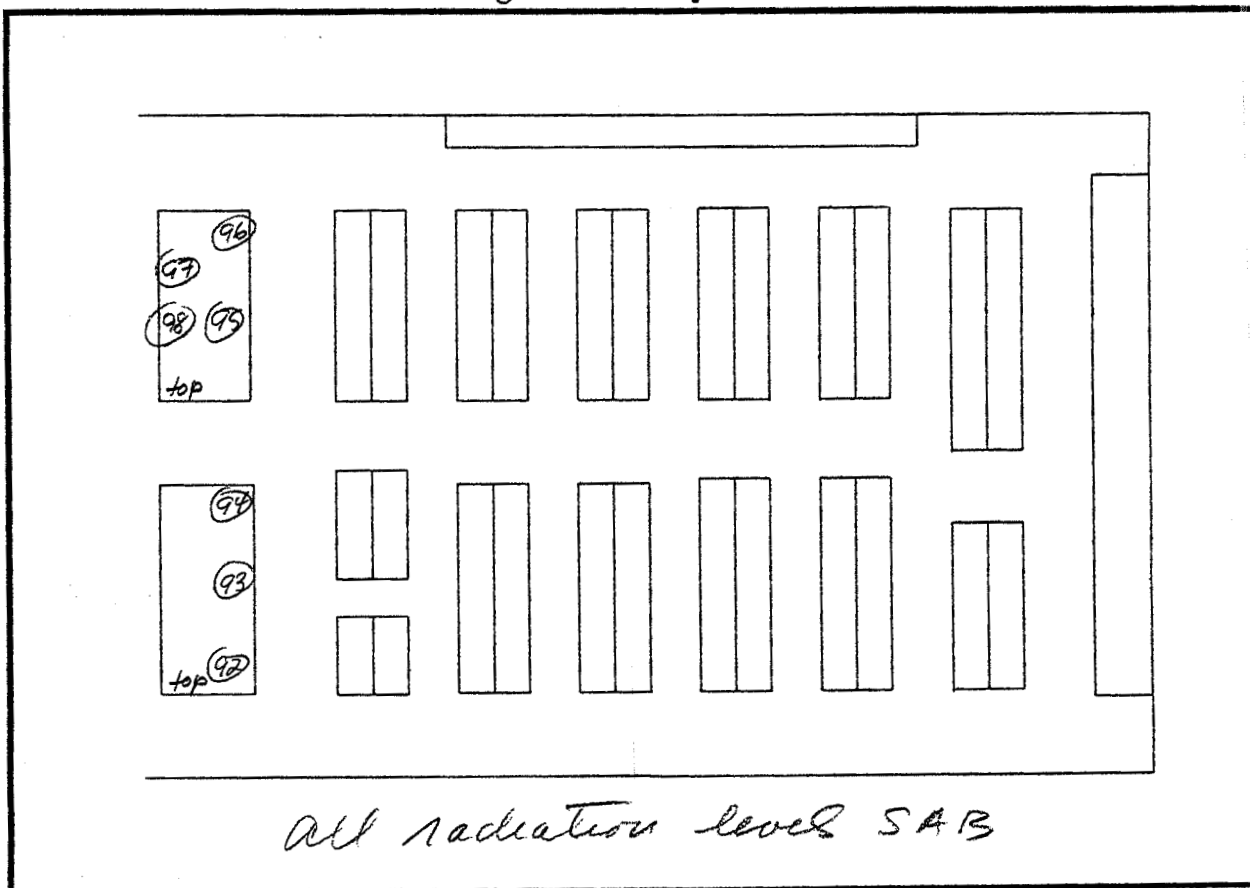
**Survey Date:** November 19, 2008

**By:** Alan H. Jones

**Survey Location:** Material Warehouse - Watch & Clock Dials/Hands Storage Area

**Type of Survey:** Radiation Level & Surface Contamination

**Diagram of Surveyed Area**



**Survey Equipment Used/Date Calibrated:** Ludlum model 14C w/44-7 probe

○ = Wipe Location

Calibrated: 8/26/08

△ = Air Sample Location

□ = Other ( )

Radiation levels in mR/hr unless otherwise specified

SAB = Same as ambient background of: 0.01 - 0.02 mR/hr

= > 100 dpm/100 cm<sup>2</sup> and cleaned to acceptable levels

# WIPE SAMPLE ANALYSIS REPORT

**Customer:** Coserv Division  
Seiko Corporation of America  
1111 Macarthur Boulevard  
Mahwah, New Jersey 07430

**Date Collected:** 11/19/08

**By:** Alan Jones  
SCT Services, Inc.  
171 Traver Road  
Pleasant Valley, NY 12569

**Contact:** Carlos Pulley

**Location:** Repair Department & other use/storage areas

**Results:**

Sample #	dpm/100cm <sup>2</sup>	Sample #	dpm/100cm <sup>2</sup>	Sample #	dpm/100cm <sup>2</sup>
1	47.7	26	62.1	51	-24.0
2	57.3	27	-9.7	52	-24.0
3	14.2	28	-14.4	53	9.5
4	28.6	29	33.4	54	-4.9
5	57.3	30	42.9	55	-33.6
6	14.2	31	-43.1	56	-0.1
7	-0.1	32	38.2	57	-4.9
8	38.2	33	4.7	58	-52.7
9	-9.7	34	-4.9	59	57.3
10	33.4	35	23.8	60	81.2
11	14.2	36	23.8	61	38.2
12	47.7	37	-14.4	62	14.2
13	19.0	38	52.5	63	19.0
14	-33.6	39	4.7	64	28.6
15	-9.7	40	23.8	65	-0.1
16	-14.4	41	14.2	66	42.9
17	62.1	42	86.0	67	100.3
18	66.8	43	4.7	68	-86.2
19	-47.9	44	14.2	69	-33.6
20	-47.9	45	-33.6	70	81.2
21	23.8	46	62.1	71	9.5
22	86.0	47	62.1	72	42.9
23	33.4	48	4.7	73	-14.4
24	90.8	49	71.6	74	52.5
25	-9.7	50	-14.4	75	-14.4

**Wipes Analyzed For:** beta-gamma vs. Pm-147 std.

**Instrument:** Ludlum Model 2200 scaler with 44-7 detector

**Background:** 29.1 cpm **Efficiency Factor:** 10.5 dpm/cpm

**Minimum Detectable Activity:** 192.3 dpm/100cm<sup>2</sup>

**Recommended Clean-up Limit:** 222 dpm/100cm<sup>2</sup>

**By:** Alan H. Jones  
Alan H. Jones  
President

**Date:** 11/19/08

# WIPE SAMPLE ANALYSIS REPORT

**Customer:** Coserv Division  
Seiko Corporation of America  
1111 Macarthur Boulevard  
Mahwah, New Jersey 07430

**Date Collected:** 11/19/08

**By:** Alan Jones  
SCT Services, Inc.  
171 Traver Road  
Pleasant Valley, NY 12569

**Contact:** Carlos Pulley

**Location:** Repair Department & other use/storage areas

**Results:**

Sample #	dpm/100cm <sup>2</sup>	Sample #	dpm/100cm <sup>2</sup>	Sample #	dpm/100cm <sup>2</sup>
76	9.5				
77	14.2				
78	42.9				
79	119.4				
80	-33.6				
81	-0.1				
82	-0.1				
83	52.5				
84	-0.1				
85	81.2				
86	76.4				
87	-9.7				
88	23.8				
89	-0.1				
90	23.8				
91	47.7				
92	-9.7				
93	33.4				
94	9.5				
95	4.7				
96	-33.6				
97	28.6				
98	-43.1				

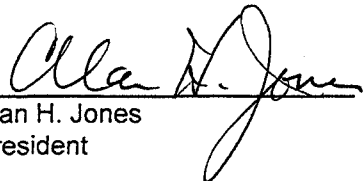
**Wipes Analyzed For:** beta-gamma vs. Pm-147 std.

**Instrument:** Ludlum Model 2200 scaler with 44-7 detector

**Background:** 29.1 cpm **Efficiency Factor:** 10.5 dpm/cpm

**Minimum Detectable Activity:** 192.3 dpm/100cm<sup>2</sup>

**Recommended Clean-up Limit:** 222 dpm/100cm<sup>2</sup>

**By:**   
Alan H. Jones  
President

**Date:** 11/19/08

October 23, 2008

Ms. Joanne Marione  
Seiko Corporation of America  
1111 Macarthur Boulevard  
Mahwah, NJ 07430

Dear Joanne:

Enclosed is a copy of my October 2008 monthly survey report, which was sent today to Carlos Pulley of Coserv-Mahwah. You will note that this month there were no wipe results over the recommended clean-up limit and no radiation levels over ambient background.

If there are any questions on the reports, please let me know. I have also enclosed my invoice.

Sincerely,



Alan H. Jones  
President

Enclosures

October 23, 2008

Mr. Carlos Pulley  
Coserv Division  
Seiko Corporation of America  
1111 Macarthur Boulevard  
Mahwah, NJ 07430

Dear Carlos:

Enclosed are the results of my Radiation Protection Survey of the Repair Department for the month of October 2008 performed on October 23, 2008. It consisted of a radiation level survey of use and storage locations and a wipe survey of surfaces in the same areas for removable contamination.

The results of the radiation survey revealed no radiation levels over ambient background. The results of the wipe survey showed no removable surface contamination levels over the recommended limit of 222 dpm/100 cm<sup>2</sup>.

If there are any questions on the above or enclosed please contact me at (845) 635-8698. Thank you for your cooperation.

Sincerely,



Alan H. Jones  
President

Enclosure

171 Traver Road  
Pleasant Valley, NY 12569

# **RADIATION PROTECTION SURVEY**

Facility: Seiko Corporation of America  
Coserv Division  
Mahwah, NJ 07430

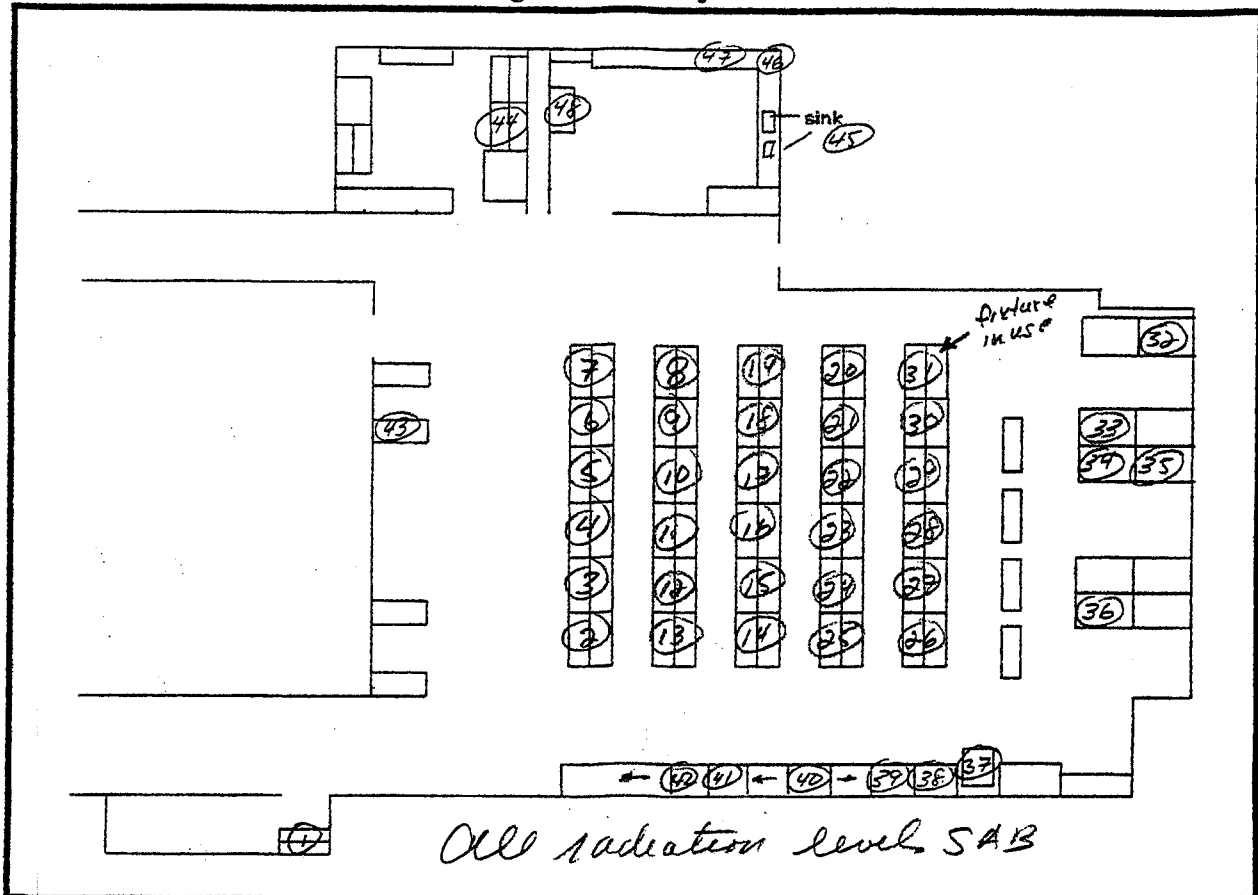
Survey Date: October 23, 2008

By: Alan V. Jones

Survey Location: Repair Department

Type of Survey: Radiation Level & Surface Contamination

**Diagram of Surveyed Area**



Survey Equipment Used/Date Calibrated: Ludlum model 14C w/44-7 probe

○ = Wipe Location

Calibrated: 8/26/08

△ = Air Sample Location

□ = Other ( )

Radiation levels in mR/hr unless otherwise specified

SAB = Same as ambient background of: 0.02 - 0.03 mR/hr

= > 222 dpm/100 cm<sup>2</sup> and cleaned to acceptable levels

# WIPE SAMPLE ANALYSIS REPORT

**Customer:** Coserv Division  
Seiko Corporation of America  
1111 Macarthur Boulevard  
Mahwah, New Jersey 07430

**Date Collected:** 10/23/08

**By:** Alan Jones  
SCT Services, Inc.  
171 Traver Road  
Pleasant Valley, NY 12569

**Contact:** Carlos Pulley

**Location:** Repair Department

**Results:**

Sample #	dpm/100cm <sup>2</sup>	Sample #	dpm/100cm <sup>2</sup>	Sample #	dpm/100cm <sup>2</sup>
1	-12.0	26	37.2		
2	37.2	27	-7.1		
3	-56.3	28	-12.0		
4	-26.8	29	37.2		
5	17.5	30	27.4		
6	-31.7	31	-2.2		
7	66.8	32	-31.7		
8	-66.2	33	-36.6		
9	52.0	34	42.1		
10	42.1	35	-80.9		
11	-41.5	36	2.8		
12	-31.7	37	52.0		
13	-2.2	38	-16.9		
14	47.1	39	-12.0		
15	32.3	40	37.2		
16	-16.9	41	-7.1		
17	22.4	42	-7.1		
18	37.2	43	-26.8		
19	-61.2	44	-7.1		
20	-51.4	45	-7.1		
21	-16.9	46	-12.0		
22	91.4	47	-56.3		
23	-2.2	48	12.6		
24	-2.2				
25	32.3				

\* This location was cleaned by worker and re-wiped

\*\* Same location after cleaning

**Wipes Analyzed For:** beta-gamma vs. Pm-147 std.

**Instrument:** Ludlum Model 2200 scaler with 44-7 detector

**Background:** 30.2 cpm **Efficiency Factor:** 10.8 dpm/cpm

**Minimum Detectable Activity:** 201.4 dpm/100cm<sup>2</sup>

**Recommended Clean-up Limit:** 222 dpm/100cm<sup>2</sup>

**By:** Alan H. Jones  
Alan H. Jones  
President

**Date:** 10/23/08