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

MS-16

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

Thank you for your assistance.

/Joanne Marione, RSO

Yours truly,

Manager, Facilities & Administration

Cc:

M. Marin T. Matsuda

Encl.

FORM 540	RAD	IAC RESEARCH CORP.	S. SHIPP	YNLHOAT ONA BANK - RB		8/HP/P4	ALO MUMBER	- _T				Radi	OR
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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 4th 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 cm².

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

=		SERVICES INC	
SURVEY	S . CHEC	KS .TESTS	

RADIATION PROTECTION SURVEY

Facility: Seiko Corporation of America	Survey Date: November 19, 2008
Cosery Division	
Mahwah, NJ 07430	By: Wan & force
Survey Location: Repair Department	
Type of Survey: Radiation Level & Surface Cont	amination
Diagram of Su	rveyed Area
Exture D	Sink (y)
	ation level SAB
w. naw	3/1/5
	•
Survey Equipment Used/Date Calibrated: <u>Ludi</u>	um model 14C w/44-7 probe
O = Wipe Location <u>Calib</u>	rated: 8/26/08
△ = Air Sample Location	
= Other ()	
Radiation levels in mR/hr unless otherwise specific	ed
SAB = Same as ambient background of: 0.01 - 0.0	2 mR/hr

= > 100 dpm/100 cm² and cleaned to acceptable levels

=		SERVICES	
SURVEY	S . CHEC	KS . TESTS	

RADIATION PROTECTION SURVEY

Facility: Seiko Corporation of America	Survey Date: November 19, 2008
Coserv Division Mahwah, NJ 07430	By: Ola V. Jove.
Survey Location: Material Room	
Type of Survey: Radiation Level & Surfac	e Contamination
Diagram	of Surveyed Area
Sign Sign Sign Sign Sign Sign Sign Sign	66 67 68 69 90 90 90 90 90 90 90 90 90 90 90 90 90
Survey Equipment Used/Date Calibrated	: Ludlum model 14C w/44-7 probe
O = Wipe Location	Calibrated: 8/26/08
\triangle = 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 cm² and cleaned to acceptable levels

=		SERVICES	
SURVEY	S + C H E C	KS .TESTS	

RADIATION PROTECTION SURVEY

Facility: Seiko Corporation of America	Survey Date: November 19, 2008
Coserv Division	By: /lla I. Jone
Mahwah, NJ 07430	By: lee A. Jone
Survey Location: <u>Dummy Watch Storage Room/Prin</u>	ting Room U
Type of Survey: Radiation Level & Surface Contamin	nation
Diagram of Survey	red Area
<u> </u>	(F)
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all radiation	n level SAB
Survey Equipment Used/Date Calibrated: <u>Ludlum</u>	model 14C w/44-7 probe
O = Wipe Location <u>Calibrate</u>	sd: 8/26/08
△ = Air Sample Location	
= Other ()	
Radiation levels in mR/hr unless otherwise specified	
SAB = Same as ambient background of: <u>0.01 - 0.02 n</u>	ıR/hr

 $= > 100 \text{ dpm}/100 \text{ cm}^2$ and cleaned to acceptable levels

		SERVICES	
SURVEYS	- CHEC	KS .TESTS	

RADIATION PROTECTION SURVEY

Facility: Seiko Corporation of America	Survey Date: November 19, 2008									
Coserv Division	By: ala V. Jon									
Mahwah, NJ 07430	By: 0000									
Survey Location: Material Warehouse - Watch & Clock Dials/Hands Storage Area										
ype of Survey: Radiation Level & Surface Contamination										
Diagram	of Surveyed Area									
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all nadia	tion level SAB									
Survey Equipment Used/Date Calibrated	: Ludium model 14C w/44-7 probe									
O = Wipe Location	Calibrated: 8/26/08									
\triangle = Air Sample Location										
□ = Other ()										
Radiation levels in mR/hr unless otherwise	specified									
SAB = Same as ambient background of: 0.0	01 - 0.02 mR/hr									

 $= > 100 \text{ dpm}/100 \text{ cm}^2$ 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 ²	Sample #	dpm/100cm ²	Sample #	dpm/100cm ²	
1	47.7	26	62.1	51	-24.0	
2 3	57.3	27	-9.7	52	-24.0	
	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/100cm²

Recommended Clean-up Limit: 222 dpm/100cm²

Date: 11/19/08

President

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 ²	Sample #	dpm/100cm ²	Sample #	dpm/100cm ²	
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:

Ludium Model 2200 scaler with 44-7 detector

Background:

29.1 cpm

Efficiency Factor: 10.5 dpm/cpm

Minimum Detectable Activity:

192.3 dpm/100cm²

Recommended Clean-up Limit:

222 dpm/100cm²

By:

Alan H. Jones

President

Date: 11/19/08

Page: 6 of 6



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 cm².

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

SERVICES INC	
SURVEYS . CHECKS . TESTS	

171 Traver Road Pleasant Valley, NY 12569 RADIATION PROTECTION SURVEY

Facility: Seiko Corporation of America Coserv Division Mahwah, NJ 07430 Survey Location: Repair Department	Survey Date: October 23, 2008 By: Ola 7/.								
Type of Survey: Radiation Level & Surface Contamination									
Diagram of S	urveyed Area								
	(47) (48) (1) (45)								
	Arriare DO								
	leation level SAB								
Survey Equipment Used/Date Calibrated: <u>Lud</u>	lum model 14C w/44-7 probe								
\bigcirc = Wipe Location <u>Calid</u> \triangle = Air Sample Location	brated: 8/26/08								
Radiation levels in mR/hr unless otherwise specified									
SAB = Same as ambient background of: 0.02 - 0.0	03 mR/hr								

= > 222 dpm/100 cm² 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 ²	Sample #	dpm/100cm ²	Sample #	dpm/100cm ²
1	-12.0	26	37.2		
2 3	37.2	27	<i>-</i> 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		i I		
25	32.3				

^{*} This location was cleaned by worker and re-wiped

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/100cm²

Recommended Clean-up Limit:

222 dpm/100cm²

President

Date: 10/23/08

^{**} Same location after cleaning