SRB TECHNOLOGIES, INC.
2580 Landmark Drive
Winston-Salem, NC 27103
Tel: (336) 659-2610
Fax: (336) 768-7720
Web: www.srbtechnologies.com

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March 30, 2010 (10:00am)

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

March 29, 2010

Secretary
U.S. Nuclear Regulatory Commission
Washington,
DC 20555-0001
Attn: Rulemaking and Adjudications Staff

Dear Commissioners,

SRB Technologies, Inc. appreciates the opportunity to comment on Docket # NRC-2009-0547.

We are a manufacturer and distributor of self-luminous exit signs and posses Radioactive Material License Numbers 034-0534-01 & 034-0534-02 issued by the State of North Carolina.

Looking at the request of the Petitioner, we would make the following comments:

1. "The labeling should be in several locations on the sign, with larger font".

SRBT exit signs have two labels on each sign; one on the outside frame and the other affixed inside the sign, so that should the frame be separated from the main body of the assembly, then a label is still visible within the sign. Font size is not specified by the regulations.

2. "An expiration date should be distinctly legible to a fire or building inspector without taking down the sign".

SRBT exit signs have an Underwriters Laboratory label affixed to the frame which clearly shows the replacement date of the sign. However, it should also be noted that a replacement date of a sign does not fall under the jurisdiction of the NRC.

3. "The radiation trefoil should be displayed on the front and back of advertisements"

Template = SECY-067

DS10

We feel this is not a valid comment as an advertisement does not contain radioactive material. If a trefoil is applied to brochure etc. it may imply that the brochures actually contain radioactive material.

The Petitioner also states that Photoluminescent technology offers an alternative technology for places without electricity. This is not the case as Photoluminescent signs require an external electrical light source to energize them and this light source must illuminate the sign at all times in which a building is occupied.

SRB Technologies share the petitioners concerns that tritium exit signs are disposed of in a proper manner and we spend considerable time and resources informing users and potential users of the correct method of disposal.

It should be noted that we have never been contacted by any landfill organization informing us that an SRB Technologies exit sign has been discarded at their facility.

Once again, we appreciate the opportunity to comment on the petition.

Sincerely,

Brian G. Pullen
President

Rulemaking Comments

From: Brian Pullen [brian@srbtechnologies.com]
Sent: Monday, March 29, 2010 8:17 PM
To: Rulemaking Comments
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