



Successful Device Approvals

April 28, 2011

J. Bruce Carrico
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Dear Mr. Carrico:

I have client who is inquiring as to the possibility of NRC exempt approval of tritium markers for distribution under 10 CFR 32.14 and 10 CFR 32.15. They consist of 25mCi (0.925GBq) of tritium within a reinforced glass vial with a sturdy metal cover on each end, connected to a ring. Included are images for reference.

The proposed uses would be for equipment marking of flashlights, tents, backpacks, kit boxes, keys, etc. Users would be military, first responders, hunters, and campers.

The activity in these markers is lower than other tritium products currently on the market such as certain watches and compasses.

We are aware that tritium glowrings have previously been denied approval by the NRC as being a frivolous product, under the guidelines listed on page 4-3 of NUREG 1556, Vol 3., Revision 1. These markers are however quite different from glowrings or other similar products, due to their construction. The manufacturer maintains that these products will not be distributed as toys, novelties, or adornments, but for practical use in locating equipment in the dark in areas without electricity, in perhaps emergency situations.

**17 Norfolk Rd., Holbrook, MA 02343 USA Ph. 877.266.0794 (U.S.)
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As you are aware, in recent years the use of tritium in consumer products has diversified from compasses and watches and now includes map reading devices, knives, etc.

We understand that you are not able to confirm if a product will or will not receive NRC approval without complete applications for an exempt device registration and a distribution license, and we are only asking at this time for your opinion if the proposed product and uses would be within NRC requirements.

If you would like to have a meeting or a conference call to discuss this issue in further detail I am happy to do so. If you have any questions please call me at 781.767.2176 or email me at schapel@irsc-inc.com.

Sincerely,

A handwritten signature in blue ink that reads "Sean C. Chapel". The signature is written in a cursive style with a large initial "S".

Sean C. Chapel
President

cc: John Jankovich
Ujagar Bhachu

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