



Philips Lighting Company
Corporate Environmental Affairs

September 13, 2011

Ms Shirley Xu
Nuclear Regulatory Commission
FSME/MSSA/LB
Mail Stop: T8E24
Washington, D.C. 20555-0001

Ms Xu,

This is a follow-up to your request for more information related to our license renewal application dated July 27, 2011. Specifically, Philips is addressing the four requests made in your letter of August 10, 2011

Please note in assembling the information to address your first request, Philips has identified two additional modifications it would like to incorporate into its license renewal application. These two requests are detailed in the response below.

REQUEST #1: State Possession and Use Licenses (10 CFR 30.33)

The State-issued Possession and Use licenses for the facilities listed on license 29-20609-02E are attached (see Attachment *State Licenses*). These include the States of California, New York, Tennessee, and Pennsylvania only.

It should be noted that the Pennsylvania license has an expiration date of September 30, 2011. A copy of the State's acknowledgement on the timely submission of a renewal application for this license is also attached.

Please remove the Salina, Kansas location from the distribution license. At some point in the past, this facility was added to the distribution license. However, a Possession and Use license was never obtained for this facility. The facility has never possessed or used byproduct materials covered under license 29-20609-02E, nor has the facility ever been involved in the distribution of these materials. The facility does maintain a State-issued license for the Possession and Use of a sealed source device for manufacturing process monitoring, but this is not relevant to the distribution license.

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Also, in Section 7 of the license, **please change the physical form for Tritium (Hydrogen-3) to reflect Gas adsorbed on metallic substrate**. This description of the physical form is consistent with documentation previously provided and also imparts consistency with the description of the material's physical form as designated on the State-issued Possession and Use licenses.

REQUEST #2: Product Related Information (10 CFR 32.14)

It should be noted that the products distributed under license 29-20609-02E are all lighting products that contain less than 15 nanoCuries of H-3 or less than 260 nanoCuries of Kr-85. Currently the product portfolio constitutes of approximately 1200 individual products containing byproduct material. A partial product listing is attached, indicating the byproduct material and activity level for each product (see *Attachment 2.1* - please note, for proprietary reasons the product codes in the attachment have been obscured to prevent disclosure of product-specific competitive information). The intent of this listing is to demonstrate the volume of relevant products and their representative byproduct content.

It is not practical to address each of these products individually to satisfy 10 CFR 32.14. However, these products can be grouped into primary product families: MSR/MSD, HPA/HPM, QL, and MHC/CDM type products (note these are product family designations used within the Lighting industry). First, for the purposes of understanding general product components and descriptions *Attachment 2.2* is provided. All products are similar in materials, design, and construction to those represented in *Attachment 2.2*.

In general ,the byproduct material is added to these lighting products to improve their starting, or light-up, performance. This in turn yields lighting products with improved energy efficiency and longer life.

Attached are numerous documents that were originally submitted to the NRC, to incorporate various product families into the distribution license. Current practice related to designs, materials, construction, and manufacturing and testing processes are still as reflected in these documents.

Therefore, the following documents should provide the information necessary to satisfy 10 CFR 32.14. These documents are arranged chronologically and combined into a single attachment (see *Attachment Product Information*).

1986-06-18 Amendment Request
1988-05-26 Amendment Request
1988-09-29 Amendment Request
1989-09-06 Amendment Request
1991-04-08 Amendment Request
1992-10-02 Amendment Request
1993-01-12 Amendment Request

Philips would like to emphasize however, that any references in these attached documents with respect to product labeling, and/or package labeling, should be superceded by the specific request made in its license renewal application, dated July 27, 2011.

REQUEST #3: Product Related Information (10 CFR 32.15)

Please refer to the documents cited and listed under **REQUEST #2** for pertinent information.

REQUEST #4: Latest Material Transfer Report (10 CFR 32.16)

Attached is the most recent Material Transfer Report, dated January 13, 2011 (see Attachment *Material Transfer Report*). This report covers material transfers during the calendar year 2010.

I hope you find the information provided to be adequate and satisfactory for the purposes of addressing your questions. Should you have any additional questions, or require additional information, please do not hesitate to contact me directly via e-mail (dean.weeks@philips.com).

Best regards,

A handwritten signature in blue ink, appearing to read 'D. Weeks', with a long horizontal stroke extending to the right.

Dean Weeks
Director – Projects Engineering & Environmental

att.