

September 29, 2014

Eastern Distribution Center

2460 Brodhead Road
Bethlehem, PA 18020

Mr. Dennis R. Lawyer
Health Physicist
Commercial and R & D Branch
Division of Nuclear Safety
United States Nuclear Regulatory Commission
Region I
2100 Renaissance Boulevard, Suite 100
King of Prussia, PA 19406

B1. 2

2014 SEP 30 14:00

1030-34371

Dear Mr. Lawyer:

Following is a request for termination of **NRC License 20-30024-03, with and expiration date of 31 July, 2023**, issued to OSRAM Sylvania for a facility located at Royal industrial Park Building C, Road No. Barrio Palmas, Catano, Puerto Rico. This site is no longer possessing or distributing from this warehouse. Product (electron and arc tubes containing ⁸⁵Kr) have been removed from the warehouse. There is no new product coming into the warehouse containing ⁸⁵Kr in the future. The inventory records retained by OSRAM Sylvania indicate that nothing has come into the warehouse and that all in house product has been shipped to customers. With that, please delete this site license. We will, of course, update the E-Distribution license associated with this activity. Once we receive the termination letter from you, we will submit an amendment to NRC in Washington, DC, to remove this site from the E-Distribution license.

A copy of an inventory report is attached for you review. You will find that there is no inventory record for the Catano, PR site in that there is no longer inventory present.

If you have questions regarding this request, please feel free to contact either myself, or our radiation consultant, Susan Engelhardt, President, Engelhardt & Associates, Inc. (contact information is listed below).

David Davies 610-317-3402
Sue Engelhardt 262-227-2341

Dave.Davies@sylvania.com
sengelhardt@wi.rr.com

Thank you for your attention to this request.

Sincerely,


David Davies
OSRAM Sylvania
Head of NAFTA Warehouse Network

cc Susan Engelhardt, President, CEO, Engelhardt & Associates, Inc
 Christopher LoRusso, OSRAM Sylvania, OSRAM Sylvania, Corporate
 Samuel Almodovar, Controller, CPA, OSRAM Sylvania (Puerto Rico)

585011

OSRAM
SYLVANIA
NMSS/RGNI MATERIALS-002



Inter-Office Memo

Osram Sylvania
Logistics Finance
100 Endicott Street
Danvers, MA 01923
Telephone (978) 777-1900

Date: September 3, 2014

Subject: **Krypton 85 Inventory Report**

From: Bei Chen

To: Sue Engelhardt - Engelhardt & Associates, Inc
Dave Davies – Bethlehem (EDC)
Ben Byarlay (MDC) & (SYL)
DeNeen Straughter – Ontario (WDC)
Samuel Almodovar – San Juan (EGV)

Sue,

Attached is the Krypton 85 Inventory Report for August 2014 for the Distribution Centers. If a location or naed does not appear it means that there was no inventory to report. Please contact me if you have any questions in regards to this report at 978-750-2369.

Warehouse Managers,

Please review your locations portion of this report and maintain and file accordingly.

Thanks,

Bei

Cc: Ann Marie Zimmerman, Steve Kelly, Al Lelis

OSRAM
SYLVANIA

ALLOWABLE MILLICURIE BY LOCATION

03-Sep-14

LOCATION	MILLICURIE TOTAL-KRYPTON
BETHLEHEM (EDC)	MAXIMUM 100 MILLICURIES
ONTARIO (WDC)	MAXIMUM 100 MILLICURIES
SAN JUAN PR (EGV)	MAXIMUM 10 MILLICURIES
VERSAILLES (MDC)	MAXIMUM 100 MILLICURIES
VERSAILLES (VER)	

Groups by DC - Krypton Report - August 2014

Plant	Item	Minor Desc	Millicurie	Inventory Units	Total Millicurie
EDC					
	DULUX	S11W, D13W, D10	0.00000378	1,180	0.0044604
	DULUX	S13W, DD9W, DD	0.0000135	396	0.005346
	DULUX	S5W, S7W, S9W	0.00000756	2,776	0.02098656
	HQI-DE	HQI-DE 70W/WD	0.00001663	886	0.01473418
	HQI-SE	HQI-SE 150W/WD	0.00002376	30,250	0.71874
	HSD	HSD 200, HSD 25	0.0000433	134	0.0058022
	HSD	HSD400, HSD575	0.0001053	121	0.0127413
	HSR	HSR 400	0.0000459	202	0.0092718
	HSR	HSR 575/2, 1200/2	0.0001053	854	0.0899262
	HTI	HTI 150	0.0000056	21,111	0.1182216
	HTI	HTI 152	0.0000197	38	0.0007486
	HTI	HTI 300W/DX	0.0000608	112	0.0068096
	HTI	HTI 705W/SE	0.0000608	3,997	0.2430176
	MC	MC150	0.0000371	1,652	0.0612892
	MC	MC70	0.0000113	157	0.0017741
	MCP	MCP39	0.0000068	4,179	0.0284172
	MCP	MCP70	0.0000113	754	0.0085202
Subtotal for EDC :				68799	1.35080674

Plant	Item	Minor Desc	Millicurie	Inventory Units	Total Millicurie
MDC					
	DULUX	S11W, D13W, D10	0.00000378	10	0.0000378
	DULUX	S13W, DD9W, DD	0.0000135	5	0.0000675
	DULUX	S5W, S7W, S9W	0.00000756	190	0.0014364
	HQI-DE	HQI-DE 70W/WD	0.00001663	840	0.0139692
	HQI-SE	HQI-SE 150W/WD	0.00002376	4,467	0.10613592
	HTI	HTI 150	0.0000056	540	0.003024
	HTI	HTI 705W/SE	0.0000608	151	0.0091808
	MC	MC150	0.0000371	341	0.0126511
	MC	MC39	0.0000068	59	0.0004012
	MC	MC70	0.0000113	114	0.0012882
	MCP	MCP39	0.0000068	664	0.0045152
	MCP	MCP70	0.0000113	375	0.0042375
Subtotal for MDC :				7756	0.15694482

Plant	Item	Minor Desc	Millicurie	Inventory Units	Total Millicurie
WDC					
	DULUX	S11W, D13W, D10	0.00000378	267	0.00100926
	DULUX	S13W, DD9W, DD	0.0000135	378	0.005103
	DULUX	S5W, S7W, S9W	0.00000756	1,243	0.00939708
	HQI-DE	HQI-DE 70W/WD	0.00001663	1,030	0.0171289
	HQI-SE	HQI-SE 150W/WD	0.00002376	1,046	0.02485296
	HSD	HSD 200, HSD 25	0.0000433	60	0.002598
	HSR	HSR 575/2, 1200/2	0.0001053	77	0.0081081
	HTI	HTI 150	0.0000056	437	0.0024472
	HTI	HTI 152	0.0000197	49	0.0009653
	HTI	HTI 300W/DX	0.0000608	16	0.0009728
	HTI	HTI 705W/SE	0.0000608	756	0.0459648
	MC	MC150	0.0000371	1,539	0.0570969
	MC	MC39	0.0000068	11	0.0000748
	MC	MC70	0.0000113	232	0.0026216
	MCP	MCP39	0.0000068	408	0.0027744
	MCP	MCP70	0.0000113	1,125	0.0127125
Subtotal for WDC :				8674	0.1938276

Plant	Item	Minor Desc	Millicurie	Inventory Units	Total Millicurie
			Grand Total :	85229	1.70157916

Groups (Total) - Krypton Report - August 2014

03-Sep-14

Item	Minor Desc	Millicurie	Inventory Units	Total Millicurie
DULUX	S11W, D13W, D10W, D18W	0.00000378	1,457	0.00550746
DULUX	S13W, DD9W, DD13W	0.0000135	779	0.0105165
DULUX	S5W, S7W, S9W	0.00000756	4,209	0.03182004
HQI-DE	HQI-DE 70W/WDX	0.00001663	2,756	0.04583228
HQI-SE	HQI-SE 150W/WDX	0.00002376	35,763	0.84972888
HSD	HSD 200, HSD 250	0.0000433	194	0.0084002
HSD	HSD400, HSD575	0.0001053	121	0.0127413
HSR	HSR 400	0.0000459	202	0.0092718
HSR	HSR 575/2, 1200/2	0.0001053	931	0.0980343
HTI	HTI 150	0.0000056	22,088	0.1236928
HTI	HTI 152	0.0000197	87	0.0017139
HTI	HTI 300W/DX	0.0000608	128	0.0077824
HTI	HTI 705W/SE	0.0000608	4,904	0.2981632
MC	MC150	0.0000371	3,532	0.1310372
MC	MC39	0.0000068	70	0.000476
MC	MC70	0.0000113	503	0.0056839
MCP	MCP39	0.0000068	5,251	0.0357068
MCP	MCP70	0.0000113	2,254	0.0254702
Grand Total :			85229	1.70157916

NAEDs by DC - Krypton Report - August 2014

03-Sep-14

Plant	Naed	Description	Millicurie	Inventory Units	Total Millicurie
EDC					
	20312	CF7DSE827 50/CS 1/	0.00000756	2,226	0.01682856
	20390	GCF7DSG23SEOF 1	0.00000756	550	0.004158
	20608	STUDIOLINE55W560	0.00000378	1,180	0.0044604
	20644	CF26DDE835ECOB	0.0000135	396	0.005346
	54078	HTI150W 90V 12/CS	0.0000056	117	0.0006552
	54079	HTI152W 95V 12/CS	0.0000197	38	0.0007486
	54102	HSR40060 67V 10/C	0.0000459	6	0.0002754
	54115	HSR57560 95V 10/C	0.0001053	46	0.0048438
	54116	HSR57572 95V 10/C	0.0001053	808	0.0850824
	54129	HSD575W724ARXS	0.0001053	121	0.0127413
	54141	HTI1200WSEXS 100	0.0000608	20	0.001216
	54170	4ArXS HSD 250W60	0.0000433	34	0.0014722
	54202	HTI1200WD760SHA	0.0000608	150	0.00912
	54202	HTI1200WD760SHA	0.0000608	640	0.038912
	54221	HTI700W75P28LOKI	0.0000608	27	0.0016416
	54225	HTI1500W60P50LOK	0.0000608	195	0.011856
	54229	HTI700W75P50LOKI	0.0000608	82	0.0049856
	54241	HTI400WD375 SHAR	0.0000459	73	0.0033507
	54242	HTI700WD475 SHAR	0.0000608	618	0.0375744
	54243	4ArXS HSD 250W80	0.0000433	29	0.0012557
	54268	HTI1200WD760 SHA	0.0000608	170	0.010336
	54269	HTI1200WD775 SHA	0.0000608	330	0.020064
	54282	HTI700WD460SHAR	0.0000608	150	0.00912
	54297	HTI250WD580BABY	0.0000608	7	0.0004256
	54298	HTI300WD557BABY	0.0000608	13	0.0007904
	54299	HTI300WD565BABY	0.0000608	99	0.0060192
	54311	HSD150W704ARXS	0.0000433	71	0.0030743
	54313	HMI575WDXS 10/CS	0.0000608	148	0.0089984
	54319	HTI1500WD760SHA	0.0000608	689	0.0418912
	54326	HTI1500WD760SHA	0.0000608	480	0.029184
	54359	HTI575WD556BABY	0.0000608	14	0.0008512
	54360	HTI400W60P28LOKI	0.0000459	123	0.0056457
	54385	HTI1000WPSLOKIT	0.0000608	150	0.00912
	54396	HTI1500W60P50M3	0.0000608	114	0.0069312
	55086	EMH150WSE70 10/C	0.00002376	38	0.00090288
	55087	EMH250WSE80 10/C	0.00002376	107	0.00254232

Plant	Naed	Description	Milllicurie	Inventory Units	Total Milllicurie
EDC					
	57028	EMH575WDE60 10/C	0.00002376	72	0.00171072
	57029	EMH575WDE75 10/C	0.00002376	67	0.00159192
	64160	MC100T6UG12830 1	0.0000371	222	0.0082362
	64170	MS175CPSBUONLY	0.00002376	10,153	0.24123528
	64171	MS175PSBUONLYM	0.00002376	1,855	0.0440748
	64359	MC150T75G12U830	0.0000371	2	0.0000742
	64361	MC70T6UG12830 12/	0.0000113	72	0.0008136
	64741	MCP150UMED830 P	0.0000113	248	0.0028024
	64749	MCP70PAR38USP83	0.0000113	280	0.003164
	64750	MCP70PAR38UFL83	0.0000113	226	0.0025538
	64793	MC70T6DE830 12/C	0.0000113	37	0.0004181
	64794	MC150T75DE830 12/	0.0000371	237	0.0087927
	64815	MS175PSBUONLY 1	0.00002376	1,635	0.0388476
	64816	MS175CPSBUONLY	0.00002376	16,323	0.38783448
	64836	M70UMED 20/CS 1/S	0.00001663	886	0.01473418
	64860	MCP20PAR20U830F	0.0000068	965	0.006562
	64862	MC70UMED830 12/C	0.0000113	48	0.0005424
	64864	MC100UMED830 12/	0.0000371	1,166	0.0432586
	64866	MC150UMED830 12/	0.0000371	25	0.0009275
	64879	MCP20PAR30LNU83	0.0000068	1,973	0.0134164
	64880	MCP39PAR30LNU83	0.0000068	3	0.0000204
	64898	MCP39PAR30LNU94	0.0000068	1,238	0.0084184
	69000	HTIS3512 85V 10/CS	0.0000608	13	0.0007904
	69043	MC15TFUGU65830 1	0.0000056	20,994	0.1175664
Subtotal for EDC :				68799	1.35080674

Plant	Naed	Description	Millicurie	Inventory Units	Total Millicurie
MDC					
	20312	CF7DSE827 50/CS 1/	0.00000756	149	0.00112644
	20312	CF7DSE827 50/CS 1/	0.00000756	1	0.00000756
	20312	CF7DSE827 50/CS 1/	0.00000756	40	0.0003024
	20644	CF26DDE835ECOB	0.0000135	5	0.0000675
	20702	FPC22830 12/CS 1/S	0.00000378	10	0.0000378
	54225	HTI1500W60P50LOK	0.0000608	15	0.000912
	54268	HTI1200WD760 SHA	0.0000608	2	0.0001216
	54268	HTI1200WD760 SHA	0.0000608	9	0.0005472
	54269	HTI1200WD775 SHA	0.0000608	8	0.0004864
	54282	HTI700WD460SHAR	0.0000608	8	0.0004864
	54319	HTI1500WD760SHA	0.0000608	109	0.0066272
	64170	MS175CPSBUONLY	0.00002376	254	0.00603504
	64170	MS175CPSBUONLY	0.00002376	39	0.00092664
	64171	MS175PSBUONLYM	0.00002376	20	0.0004752
	64171	MS175PSBUONLYM	0.00002376	6	0.00014256
	64171	MS175PSBUONLYM	0.00002376	458	0.01088208
	64171	MS175PSBUONLYM	0.00002376	11	0.00026136
	64193	MCP70UMED940PB	0.0000113	5	0.0000565
	64194	MCP70CUMED940P	0.0000113	13	0.0001469
	64325	MC39T6UG1294012/	0.0000068	45	0.000306
	64337	MC150T75UG12940	0.0000371	1	0.0000371
	64337	MC150T75UG12940	0.0000371	10	0.000371
	64359	MC150T75G12U830	0.0000371	3	0.0001113
	64359	MC150T75G12U830	0.0000371	2	0.0000742
	64361	MC70T6UG12830 12/	0.0000113	106	0.0011978
	64363	MC39T6UG12830 12/	0.0000068	1	0.0000068
	64363	MC39T6UG12830 12/	0.0000068	1	0.0000068
	64741	MCP150UMED830 P	0.0000113	338	0.0038194
	64741	MCP150UMED830 P	0.0000113	3	0.0000339
	64749	MCP70PAR38USP83	0.0000113	15	0.0001695
	64750	MCP70PAR38UFL83	0.0000113	1	0.0000113
	64793	MC70T6DE830 12/C	0.0000113	2	0.0000226
	64794	MC150T75DE830 12/	0.0000371	99	0.0036729
	64815	MS175PSBUONLY 1	0.00002376	23	0.00054648
	64815	MS175PSBUONLY 1	0.00002376	25	0.000594
	64815	MS175PSBUONLY 1	0.00002376	17	0.00040392
	64815	MS175PSBUONLY 1	0.00002376	189	0.00449064
	64815	MS175PSBUONLY 1	0.00002376	26	0.00061776

Plant	Naed	Description	Millicurie	Inventory Units	Total Millicurie
MDC					
	64816	MS175CPSBUONLY	0.00002376	3,399	0.08076024
	64836	M70UMED 20/CS 1/S	0.00001663	840	0.0139692
	64860	MCP20PAR20U830F	0.0000068	65	0.000442
	64862	MC70UMED830 12/C	0.0000113	6	0.0000678
	64864	MC100UMED830 12/	0.0000371	5	0.0001855
	64864	MC100UMED830 12/	0.0000371	6	0.0002226
	64866	MC150UMED830 12/	0.0000371	215	0.0079765
	64879	MCP20PAR30LNU83	0.0000068	265	0.001802
	64880	MCP39PAR30LNU83	0.0000068	24	0.0001632
	64898	MCP39PAR30LNU94	0.0000068	310	0.002108
	68842	MC20TFUG65830 12/	0.0000056	7	0.0000392
	69043	MC15TFUGU65830 1	0.0000056	533	0.0029848
	69044	MC39TFUGU65930 1	0.0000068	12	0.0000816
	Subtotal for MDC :			7756	0.15694482

Plant	Naed	Description	Millicurie	Inventory Units	Total Millicurie
WDC					
	20312	CF7DSE827 50/CS 1/	0.00000756	1,243	0.00939708
	20608	STUDIOLINE55W560	0.00000378	256	0.00096768
	20644	CF26DDE835ECOB	0.0000135	378	0.005103
	20702	FPC22830 12/CS 1/S	0.00000378	11	0.00004158
	54079	HTI152W 95V 12/CS	0.0000197	49	0.0009653
	54115	HSR57560 95V 10/C	0.0001053	77	0.0081081
	54225	HTI1500W60P50LOK	0.0000608	184	0.0111872
	54242	HTI700WD475 SHAR	0.0000608	61	0.0037088
	54243	4ArXS HSD 250W80	0.0000433	60	0.002598
	54269	HTI1200WD775 SHA	0.0000608	42	0.0025536
	54282	HTI700WD460SHAR	0.0000608	19	0.0011552
	54282	HTI700WD460SHAR	0.0000608	1	0.0000608
	54299	HTI300WD565BABY	0.0000608	16	0.0009728
	54319	HTI1500WD760SHA	0.0000608	449	0.0272992
	55086	EMH150WSE70 10/C	0.00002376	10	0.0002376
	64170	MS175CPSBUONLY	0.00002376	22	0.00052272
	64171	MS175PSBUONLYM	0.00002376	591	0.01404216
	64193	MCP70UMED940PB	0.0000113	1	0.0000113
	64361	MC70T6UG12830 12/	0.0000113	9	0.0001017
	64361	MC70T6UG12830 12/	0.0000113	15	0.0001695
	64363	MC39T6UG12830 12/	0.0000068	8	0.0000544
	64363	MC39T6UG12830 12/	0.0000068	3	0.0000204
	64741	MCP150UMED830 P	0.0000113	87	0.0009831
	64749	MCP70PAR38USP83	0.0000113	830	0.009379
	64750	MCP70PAR38UFL83	0.0000113	207	0.0023391
	64793	MC70T6DE830 12/C	0.0000113	41	0.0004633
	64793	MC70T6DE830 12/C	0.0000113	8	0.0000904
	64794	MC150T75DE830 12/	0.0000371	32	0.0011872
	64794	MC150T75DE830 12/	0.0000371	6	0.0002226
	64815	MS175PSBUONLY 1	0.00002376	24	0.00057024
	64815	MS175PSBUONLY 1	0.00002376	115	0.0027324
	64816	MS175CPSBUONLY	0.00002376	284	0.00674784
	64825	MC70TCUG85930 90	0.0000113	112	0.0012656
	64825	MC70TCUG85930 90	0.0000113	15	0.0001695
	64836	M70UMED 20/CS 1/S	0.00001663	1,030	0.0171289
	64860	MCP20PAR20U830F	0.0000068	2	0.0000136
	64860	MCP20PAR20U830F	0.0000068	4	0.0000272
	64862	MC70UMED830 12/C	0.0000113	32	0.0003616

Plant	Naed	Description	Millicurie	Inventory Units	Total Millicurie
WDC					
	64864	MC100UMED830 12/	0.0000371	1,476	0.0547596
	64866	MC150UMED830 12/	0.0000371	25	0.0009275
	64879	MCP20PAR30LNU83	0.0000068	240	0.001632
	64880	MCP39PAR30LNU83	0.0000068	18	0.0001224
	64880	MCP39PAR30LNU83	0.0000068	113	0.0007684
	64898	MCP39PAR30LNU94	0.0000068	31	0.0002108
	69043	MC15TFUGU65830 1	0.0000056	437	0.0024472
		Subtotal for WDC :		8674	0.1938276

Plant	Naed	Description	Millicurie	Inventory Units	Total Millicurie
WDC					
Grand Total :				85229	1.70157916

This is to acknowledge the receipt of your letter application dated

09/29/2014, and to inform you that the initial processing which includes an administrative review has been performed.

20-30024-03 (termination)
☒ There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 585011.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.