



4625 W JEFFERSON BVD, LOS ANGELES, CA 90016
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December 2, 2011

RE: Petition for Regulation to amend NRC Regulation 10 CFR 32.14, 32.15, and 32.22(b).

Secretary, Rulemaking
U.S. Nuclear Regulatory Commission (NRC)
11555 Rockville Pike
Rockville, MD 20852

We hereby file a petition for regulation to amend NRC Regulation 10 CFR 32.14, “Certain items containing byproduct material; requirements for license to apply or initially transfer,” and 32.15, “Certain items containing byproduct material” to include illumination markers containing tritium, as well as 10 CFR 32.22(b), Self-luminous products containing tritium, krypton-85 or promethium-147: Requirements for license to manufacture, process, produce, or initially transfer,” to include illumination markers containing tritium.

The purpose of use these illumination markers will be for equipment such as kit boxes, flashlights, tents, backpacks, keys, etc. Users of the product would include military, first responders, hunters, and campers.

Previous justification provided by the NRC for past denial of approval of such products indicated that the end uses of the product could not be reasonably foreseen. **We believe that the primary consideration in approval should be the potential radiation doses to members of the public under normal use and accident conditions, and that these doses are within regulatory limits.** This statement is consistent with the Presidential Executive Order on Scientific Integrity issued on March 9, 2009, which states that government policies must be based upon scientific determinations.

Enclosed are radiation dose calculations which verify that under 10 CFR 32.23 and 32.24 during expected use and accident conditions, doses to users of marker devices containing 25 mCi H-3 would be below regulatory limits, based on the NUREG-1717 methodology.

We are aware that under the NRC Consumer Policy Statement dated March 16, 1965, 30FR 3462 (in revision) questions regarding the potential frivolous use of radioactive material are required to be addressed. Illumination markers are sold in other countries, have a practical benefit, and help military personnel recover lost items, help first



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responders locate tagged equipment cases at night, assist hunters find lost items, and help lost campers find their tents. We would consider an example of frivolous use to be jewelry containing radioactive material for illumination, as there is no direct benefit associated with it.

The use of Gaseous Tritium Light Sources (GTLS) over the past generation, replacing painted radioluminescent materials, has greatly reduced the potential for the consumer to come into contact with any radioactive material. The markers proposed to be distributed by Campco use an Mb Microtec registered source, NY-1271-S-101-S.

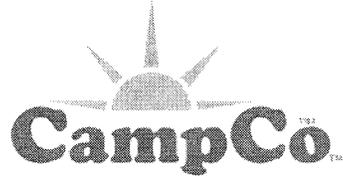
Enclosed are photographs of illumination markers displaying how they are used. Their use market will be similar to gunsights containing tritium, which are sold in sporting goods stores.

Illumination markers are of sturdy construction and have been accidentally run over by cars before and still retained their integrity. Upon amendment of this regulation we would apply for an exempt device registration and distribution license confirming the safety of these products for commercial distribution.

If you have any questions please call me at 310-466-5068 or 323-766-2555

Sincerely,

Sandra Blanco
on behalf of Motti M Slodowitz
President / CEO



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Images of illumination markers:

