Daniel J. Evans, Certified Health Physicist
Simple Smart Safety, LLC
8 White Oak Road
Ansonia, CT. 06401
203-906-8047
sss@simplesmartsafety.com

Representing
PLUS,LLC
Jay Gupta, Director
733 Summer Street, Suite 506
Stamford, Connecticut 06901

May 18, 2015

Shirley Xu
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal and Rulemaking Programs
Office of Nuclear Material Safety and Safeguards

Reference
Docket No. 030-38784
Mail Control No. 585157

Dear Shirley Xu:

Please review attached response to your follow up questions related to distribution license application submitted October 28 of last year. If further clarification or information is required - please contact Daniel Evans and information will be provided promptly.

Sincerely,

Daniel J. Evans, Certified Health Physicist

ENCLOSURE

1. Submit the details of construction and design of each product;

   A description of each watch offered for sale is included. (See attachment)

2. The method of containment or binding of the byproduct material in the product;

   The watch utilizes gaseous tritium (H_2 Molecule made up of H^3 Atoms) contained inside miniature glass vials placed strategically along the watch face and hands to provide the illumination. Verification that the tritium is contained and no leakage has occurred is best done visually by verification that the 'glow' is still present at each location.

3. The proposed method of labeling or marking each unit, except timepieces or hands or dials containing tritium, and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product.

   Each watch is marked on face "25 mci" indicating that each timepiece is less than the 25 mci trigger point associated with 10CFR 30.15. Manufacturer 'Luminox' is also noted on watch face.

Note: T 25. Indicates that the watch contains Tritium 'T'. Less than 25 millicuries.

4. The radiation level and the method of measurement;

On contact reading with watch face using a Ludlum Model 12 and a 44-9 Geiger Mueller probe indicates no detectable above background in counts per minute (cpm). This is the expected result based on activity, energy and type of radiation emitted by the isotope contained. (Tritium). Tritium is a pure Beta emitter. The maximum energy of the emitted radiation is a low energy particle 18 kev. The average energy is about 1/3 of this amount - 5.7 kev. This type of radiation and low energy is not sufficient to exit the glass vial that contains the hydrogen gas and the watch face. The radioactive hydrogen contained in the watch is very difficult to detect using normal radiation detection instruments. Verification that the radioisotope is present and contained is best done visually by verification the 'glow' is present at all prescribed locations along the watch face.

5. Provide distribution methods when using internet service providers, e.g. Amazon, eBay.

Distribution will consist of Amazon/Ebay taking the orders, but all stock and all shipments will originate from 733 Summer Street, Stamford, CT. This will be done in order to comply with the requirement for a receipt QA program which will take place upon receipt of watches to the United States from overseas shipping/manufacturing. The QA inspections will also take place at this physical address.