



May 27, 2015

United States Nuclear Regulatory Commission

Washington, DC, 20555-0001

Att: Mr. Hector Rodriguez-Luccioni, Ph. D.

Subject: Response to request for additional information regarding Lumondi Inc exempt distribution license renewal application (Licensee #04-23929-01E)

Mr. Rodriguez,

Please see below and attached, answers and supporting documents for Questions 1-4:

1. *Please provide the model numbers you will be distributing under your exempt distribution license no. 04-23923-01E and the maximum quantity of byproduct material in each model as required by 10 CFR 32.14(b)(1):*

Attached you will find a listing of each model # watch in our line with the amount of tritium material used in each watch (25 milicurie). (Schedule A)

I have also attached the last Transfer report that we filed for 2014, which gives a summary by watch series of how many items containing byproduct material were distributed from our warehouse facility for the year ending 2014. (Schedule B)

2. *As required by 10 CFR 32.14(b)(2) please provide a detailed description of the construction and design of each product:*

All of our watches are made up of the following base components:

1. Dial (fitted with tritium markers)
2. Hour, Minute and Second Hand (fitted with tritium markers)
3. Case (Made of polymer or steel)

4. Case back
5. Movement (engine of the watch) either Swiss Quartz or Swiss Automatic
6. Crystal made of glass (Hardened Mineral Glass or Sapphire Crystal)
7. Bezel (used on our dive watches to track elapsed time)
8. Crown (used to adjust time/date)
9. Strap or Bracelet

The movement (engine of the watch) is inserted into the case body and the case back is applied to the back of the watch.

Tritium tubes are applied by hand to an adhesive backing, which is used to affix the tubes to the dial and hour, minute and second hand of the watch. A robot arm is then used to affix these hands to the center post of the watch ensuring proper clearance of the hands (due to the height of the tubes).

The crystal is applied to the top of the watch, sealing the inner workings. The bezel is compressed onto the top of the watch head. The crown is now inserted to test the function of the movement.

This watch head is then pressure tested for water resistance.

After passing of this test, the strap or bracelet is applied and the watch is put aside in a test room to check for watch movement / timing accuracy.

3. *As required by 10 CFR 32.14(b)(3) please provide the method of containment or binding of the byproduct material in the product:*

The tubes that we use have been manufactured and purchased from MB Microtec (Bern, Switzerland). These tubes are made from borosilicate glass and have been filled with phosphor powder and byproduct material under vacuum and then laser sealed. We apply these tubes to the hands and dials of our watches with an adhesive strip or glue, which holds them in place.

4. *As required by 10 CFR 32.14(b)(6) please provide the proposed method of labeling or marking the container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product:*

All of our watches have our license transfer/import # engraved on the case back of the watch (1GBq H-3 LX/MBM).

In addition, the dials of all of our watches have the symbol T25 to designate a total activity level of less than 1 GBq.

I hope that this answers/completes our License Renewal Application.

Sincerely,

A handwritten signature in black ink, appearing to read "Max W. Robertson", with a horizontal line extending to the right.

Max W. Robertson

Director of U.S. Operations

Radiation Safety Officer

Lumondi Inc. **DBA** Luminox Watch Company

415-455-9500 ext 108

Maxluminox@aol.com



Schedule A

EFFECTIVE 4/1/2015

2015 WATCH PRICE LIST

ACCOUNT _____
BUYER _____
LOCATION _____
TO ORDER: FAX 415-482-8215 OR EMAIL SALES@LUMINOXUSA.COM

P.O.# _____
PHONE _____
SHIP METHOD _____

DATE _____
TERMS _____
SHIP DATE _____
REP _____

Table with columns: QTY, MODEL, DIAL/MARKINGS, CASE, STRAP / BRACELET, UPC CODE, H3 content. Rows include series like ANU (AUTHORIZED FOR NAVY USE) CHRONOGRAPH 4240 SERIES - 45mm, ANU (AUTHORIZED FOR NAVY USE) 4200 SERIES - 45mm, ORIGINAL NAVY SEAL 3000 SERIES - 43mm, 25TH ANNIVERSARY 3050 SERIES - 44mm, 25TH ANNIVERSARY SOG KNIFE SET - 44mm, NAVY SEAL COLORMARK 3050 SERIES - 44mm, NAVY SEAL COLORMARK 7050 SERIES - 38mm, NAVY SEAL COLORMARK CHRONOGRAPH 3080 SERIES - 44mm, NAVY SEAL STEEL COLORMARK 3150 SERIES - 44mm, NAVY SEAL STEEL COLORMARK CHRONOGRAPH 3180 SERIES - 44mm.



2015 WATCH PRICE LIST

EFFECTIVE 4/1/2015

QTY	MODEL	DIAL/MARKINGS	CASE	STRAP / BRACELET	UPC CODE	H3 content
MODERN MARINER AUTOMATIC 6500 SERIES - 45mm						
	6502	BLK/SILVER	STEEL	STEEL BRACELET	7-46469-65021-8	25 millicurie
	6502 BO	BLK/DK GRAY	BLK PVD STEEL	BLK PVD STEEL BRACELET	7-46469-65022-5	25 millicurie
MODERN MARINER 6250 SERIES - 45mm						
	6251 BO	BLK/DK GRAY	BLK PVD STEEL	BLK LEATHER STRAP W/ GRAY STITCHING	7-46469-62512-4	25 millicurie
	6252	BLK/WHIT	STEEL	STEEL BRACELET	7-46469-62521-6	25 millicurie
	6252 BO	BLK/BLK	BLK PVD STEEL	BLK PVD STEEL BRACELET	7-46469-62522-3	25 millicurie
	6265	BLK/WHIT	STEEL	BLK LEATHER STRAP W/ RED STITCHING & LINING	7-46469-62651-0	25 millicurie
MODERN MARINER 7250 SERIES - 38mm						
	7251 BO	BLK/DK GRAY	BLK PVD STEEL	BLK LEATHER STRAP W/ DK GRAY STITCHING	7-46469-72512-1	25 millicurie
	7252 BO	BLK/DK GRAY	BLK PVD STEEL	BLK PVD STEEL BRACELET	7-46469-72522-0	25 millicurie
	7257	MOP/GRAY	STEEL	WHITE LEATHER STRAP W/ GRAY STITCHING	7-46469-72570-1	25 millicurie
	7258	MOP/GRAY	STEEL	STEEL BRACELET	7-46469-72580-0	25 millicurie
SCOTT CASSELL SPECIAL EDITIONS - 44mm						
NEW	3955 SET	YELLOW/BLK	PC CARBON	NATO STRAP, PU STRAP, EXT. COMPASS	7-46469-39553-9	25 millicurie
	3059 SET	ORANGE/BLK	PC CARBON	1 x FASTSTRAP, PU & NATO STRAPS, EXT. COMPASS	7-46469-30543-9	25 millicurie
	1526	BLK/YELLOW/WHIT	BLK PVD STEEL	INTEGRATED PU STRAP, WET SUIT EXTENSION	7-46469-15261-3	25 millicurie
DEEP DIVE AUTOMATIC 1500 SERIES - 44mm						
	1511	BLK/WHIT	BLK PVD STEEL	INTEGRATED PU STRAP, WET SUIT EXTENSION	7-46469-15113-8	25 millicurie
	1512	BLK/WHIT	STEEL	INTEGRATED PU STRAP, WET SUIT EXTENSION	7-46469-15121-0	25 millicurie
	1513	BLUE/WHIT	STEEL	INTEGRATED PU STRAP, WET SUIT EXTENSION	7-46469-15131-9	25 millicurie

P-38 LIGHTNING™ AUTOMATIC 9400 SERIES - 44mm						
	9401	BLK/IVORY	STEEL	BLK LEATHER	7-46469-94011-1	25 millicurie
P-38 LIGHTNING™ VALJOUX AUTOMATIC CHRONOGRAPH 9460 SERIES - 44mm						
	9461	BLK/IVORY	STEEL	BLK LEATHER	7-46469-94611-3	25 millicurie
P-38 LIGHTNING™ 9420 SERIES - 44mm						
	9421	BLK/IVORY	STEEL	BLK LEATHER	7-46469-94211-5	25 millicurie
P-38 LIGHTNING™ CHRONOGRAPH 9440 SERIES - 44MM						
	9441	BLK/IVORY	STEEL	BLK LEATHER	7-46469-94411-9	25 millicurie
F-117 NIGHTHAWK™ 6400 SERIES - 45mm						
	6402	BLK/WHIT	BLK PVD STEEL	BLK PVD STEEL BRACELET	7-46469-64020-2	25 millicurie
	6402 BO	BLK/BLK	BLK PVD STEEL	BLK PVD STEEL BRACELET	7-46469-64022-6	25 millicurie
F-22 RAPTOR™ 9270 SERIES - 44mm						
	9272	BLK/SILVER	BLK PVD TITANIUM	BLACK PVD TITANIUM BRACELET	7-46469-92720-4	25 millicurie
	9278	BLK/SILVER	BLK PVD TITANIUM	BLK LEATHER STRAP W/ RED STRIPE	7-46469-92780-8	25 millicurie
F-35 LIGHTNING II™ 9380 SERIES - 45mm						
	9382	BLK/ORANGE	STEEL	STEEL BRACELET	7-46469-93820-0	25 millicurie
	9388	BLK/ORANGE	STEEL	BLK LEATHER STRAP W/ ORANGE STITCHING	7-46469-93880-4	25 millicurie



2015 WATCH PRICE LIST

EFFECTIVE 4/1/2015

QTY	MODEL	DIAL/MARKINGS	CASE	STRAP / BRACELET	UPC CODE	H3 content
TONY KANAAN CHRONOGRAPH 1100 SERIES - 44mm						
	1101	BLK/YELLOW	PC CARBON	BLK SILICONE STRAP	7-46469-11011-8	25 millicurie
	1105	YELLOW/BLK	PC CARBON	BLK SILICONE STRAP	7-46469-11051-4	25 millicurie
TONY KANAAN CHRONOGRAPH 1140 SERIES - 44mm						
	1142	BLK/BLK	BLK PVD STEEL	BLK LEATHER STRAP W/ WHITE STRIPES	7-46469-11425-3	25 millicurie
	1143	WHT/BLK	BLK PVD STEEL	BLK LEATHER STRAP W/ WHITE STRIPES	7-46469-11435-2	25 millicurie
FIELD VALJOUX AUTOMATIC CHRONOGRAPH 1860 SERIES - 48mm						
	1861.BO	BLK/DK GRAY	BLK PVD STEEL	BLK LEATHER STRAP W/ DK GRAY STITCHING	7-46469-18612-0	25 millicurie
FIELD AUTOMATIC DAY DATE 1800 SERIES - 43mm						
	1801	BLK/IVORY	STEEL	DK BROWN LEATHER STRAP W/ IVORY STITCHING	7-46469-18011-1	25 millicurie
	1801.BO	BLK/DK GRAY	BLK PVD STEEL	BLK LEATHER STRAP W/ DK GRAY STITCHING	7-46469-18012-8	25 millicurie
ATACAMA FIELD CHRONOGRAPH ALARM 1940 SERIES - 45mm						
	1941	BLK CARBON/GRAY	GUN PVD STEEL	BLK LEATHER STRAP W/ WT STITCHING	7-46469-19411-8	25 millicurie
	1941.BO	BLK/DK GRAY	BLK PVD STEEL	BLK LEATHER STRAP W/ DK GRAY STITCHING	7-46469-19412-5	25 millicurie
	1942	BLK CARBON/GRAY	GUN PVD STEEL	GUN PVD STEEL BRACELET	7-46469-19421-7	25 millicurie
	1943	BLUE/GRAY	GUN PVD STEEL	GRAY DISTRESSED LEATHER STRAP	7-46469-19431-6	25 millicurie
	1945	BLK/TAN	BLK PVD STEEL	GOLDEN TAN DISTRESSED LEATHER STRAP	7-46469-19451-4	25 millicurie
	1947	IVORY/BROWN	GUN PVD STEEL	BROWN LEATHER STRAP W/ IVORY STITCHING	7-46469-19471-2	25 millicurie
ATACAMA FIELD DAY DATE 1920 SERIES - 45mm						
	1921	BLK CARBON/GRAY	GUN PVD STEEL	BLK LEATHER STRAP W/ WT STITCHING	7-46469-19211-4	25 millicurie
	1921.BO	BLK/DK GRAY	BLK PVD STEEL	BLK LEATHER STRAP W/ DK GRAY STITCHING	7-46469-19212-1	25 millicurie
	1922	BLK CARBON/GRAY	GUN PVD STEEL	GUN PVD STEEL BRACELET	7-46469-19221-3	25 millicurie
	1923	BLUE/GRAY	GUN PVD STEEL	GRAY DISTRESSED LEATHER STRAP	7-46469-19231-2	25 millicurie
	1925	BLK/TAN	BLK PVD STEEL	GOLDEN TAN DISTRESSED LEATHER STRAP	7-46469-19251-0	25 millicurie
	1927	IVORY/BROWN	GUN PVD STEEL	BROWN LEATHER STRAP W/ IVORY STITCHING	7-46469-19271-8	25 millicurie
BLACK OPS CARBON 8800 SERIES - 45mm						
	8802	GRAY/BLK	PC CARBON	SIGNATURE PU STRAP	7-46469-88021-9	25 millicurie
	8815	BLK/GRAY	PC CARBON	SIGNATURE PU STRAP	7-46469-88151-3	25 millicurie
	8817.GO	BLK/OLIVE	PC CARBON	OLIVE NATO STRAP	7-46469-88172-8	25 millicurie
RECON TEAM LEADER CHRONOGRAPH SET 8840 SERIES - 48mm						
NEW	8841.KM.SET	BLK/WHT/YELLOW	PC CARBON	LEADER PU STRAP & GRAY WEBBING STRAP	7-46469-88411-8	25 millicurie
NEW	8842.MI.SET	BLK/WHT/YELLOW	PC CARBON	LEADER PU STRAP & GRAY WEBBING STRAP	7-46469-88422-4	25 millicurie
RECON POINT MAN 8820 SERIES - 45mm						
	8821.KM	BLK/WHT/ORANGE	PC CARBON	SIGNATURE PU STRAP	7-46469-88210-7	25 millicurie
	8822.MI	BLK/WHT/ORANGE	PC CARBON	SIGNATURE PU STRAP	7-46469-88220-6	25 millicurie
	8823.KM	BLK/GRAY/BLUE	PC CARBON	GRAY NATO STRAP	7-46469-88231-2	25 millicurie
	8824.MI	BLK/GRAY/BLUE	PC CARBON	GRAY NATO STRAP	7-46469-88241-1	25 millicurie
	8825.KM	BLK/OLIVE/YELLOW	PC CARBON	OLIVE NATO STRAP	7-46469-88251-0	25 millicurie
	8826.MI	BLK/OLIVE/YELLOW	PC CARBON	OLIVE NATO STRAP	7-46469-88261-9	25 millicurie
RECON NAV SPC - 46mm						
	8831.KM	BLK/WHT/GRN	PC CARBON	NAV SPC PU STRAP W/COMPASS	7-46469-88311-1	25 millicurie
	8832.MI	BLK/WHT/GRN	PC CARBON	NAV SPC PU STRAP W/COMPASS	7-46469-88321-0	25 millicurie
SENTRY 0200 SERIES - 43MM						
	0201.SL	BLK/WHT/GRN	PC CARBON	SIGNATURE PU STRAP	7-46469-02010-3	25 millicurie
	0201.BO	BLK/BLK	PC CARBON	SIGNATURE PU STRAP	7-46469-02012-7	25 millicurie
	0215.SL	BLK/RED/GRN	PC CARBON	SIGNATURE PU STRAP	7-46469-02150-6	25 millicurie



2015 WATCH PRICE LIST

QTY	MODEL	DIAL/MARKINGS	CASE	STRAP / BRACELET	UPC CODE	H3 content
SXC/XCOR PILOT PROFESSIONAL TITANIUM ANALOG DIGITAL 5240 SERIES - 45.5mm						
	5241	BLK/WHITE	TITANIUM	BLK LEATHER STRAP W/ GRAY STITCHING	7-46469-52411-3	25 milicurie
SXC STEEL GMT 5120 SERIES - 45.5mm						
	5121.GN	BLK/GRAY	GUN PVD STEEL	DK GRAY CORDURA STRAP W/ BLUE STITCHING	7-46469-51211-0	25 milicurie
	5127	BLK/GRAY	STEEL & BLK PVD STEEL	BLK LEATHER STRAP W/ RED STITCHING	7-46469-51271-4	25 milicurie
SXC PC CARBON GMT 5020 SERIES - 45.5mm						
	5021	BLK/WHT	DK GRAY PC CARBON	DARK GRAY SIGNATURE PU STRAP	7-46469-50211-1	25 milicurie
	5021.GN	BLK/GRAY	DK GRAY PC CARBON	DARK GRAY SIGNATURE PU STRAP	7-46469-50212-8	25 milicurie
	5023	BLUE/WHT	DK GRAY PC CARBON	DARK GRAY SIGNATURE PU STRAP	7-46469-50231-9	25 milicurie
	5027	BLK/WHT	DK GRAY PC CARBON	DARK GRAY SIGNATURE PU STRAP	7-46469-50271-5	25 milicurie

WALL CLOCK - 40cm						
	A.BIG.40	BLK/WHT	PLASTIC ABS	NA	7-46469-00040-2	25 milicurie
COMPASS - FITS 23mm STRAP						
	FAC.COMP.23	BLK/GRN	BLK POLYCARBON	SLIDES ONTO 22MM & 23MM STRAPS	7-46469-88323-4	25 milicurie

US ONLY MODELS NOT SHOWN IN 2015 CATALOG

SCOTT CASSELL SPECIAL EDITION - 44mm						
	3054.SET	DK BLUE/WT	PC CARBON	2 FASTSTRAPS, 1 PU STRAP, EXTENDER, COMPASS	7-46469-30541-5	25 milicurie
NAVY SEAL COLORMARK 3050 SERIES - 44mm						
	3055.LM	YELLOW/BLK	PC CARBON	SIGNATURE PU STRAP	7-46469-30552-1	25 milicurie
	3059.GG	ORANGE/BLK	PC CARBON	SIGNATURE PU STRAP	7-46469-30592-7	25 milicurie
	3063.LM	KHAKI/BLK	PC CARBON	SIGNATURE PU STRAP	7-46469-30632-0	25 milicurie
BLACK OPS CARBON 8800 SERIES - 45mm						
	8809.GG	ORANGE/BLK	PC CARBON	SIGNATURE PU STRAP	7-46469-88091-2	25 milicurie
	8813.LM	KHAKI/BLK	PC CARBON	SIGNATURE PU STRAP	7-46469-88132-2	25 milicurie
	8819.GG	BLK/ORANGE	PC CARBON	SIGNATURE PU STRAP	7-46469-88191-9	25 milicurie
FIELD DAY DATE 1820 SERIES - 42mm						
	1822	BLK/WHT	STEEL	STEEL BRACELET	7-46469-18222-1	25 milicurie
	1827	IVORY/BLK	STEEL	BROWN LEATHER STRAP W/IVORY STITCHING	7-46469-18272-6	25 milicurie
	1828	BLK/WHT	STEEL	BLK LEATHER STRAP W/IVORY STITCHING	7-46469-18282-5	25 milicurie

Schedule B



January 8, 2015

ATTN: Document Control Desk/Exempt Distribution

Director, Office of Nuclear Material Safety and Safeguards

U.S. Nuclear Regulatory Commission

Washington, DC 20555-0001

RE: Licensee # 04-23929-01E

2014 Transfer Reporting of items for use under 10 CFR 30.15 specifically
(1) Timepieces or hands or dials containing not more than the following specified quantities of byproduct material and not exceeding the following specified levels of radiation:

(i) 25 millicuries of tritium per timepiece

To Whom It May Concern,

Please find for your review the 2014 report of items containing by-product material that were distributed from our warehouse facility for the year ending 2014.

Sincerely,

A handwritten signature in black ink, appearing to read "Max W. Robertson", with a horizontal line extending to the right.

Max W. Robertson
Director of U.S. Operations
Radiation Safety Officer
Lumondi Inc. **DBA** Luminox Watch Company
415-455-9500 ext 32
Maxluminox@aol.com

Series Name	Units Distributed
0200 series	2,647
1180 series	484
1500 series	160
1800 series	243
1820 series	1,643
1900 series	2,360
3000 series	3,685
3040 series	709
3050 series	15,209
3080 series	3,022
3150 series	1,792
3180 series	702
3400 series	5
4220 series	2,084
5020 series	1,306
5121 series	598
6250 series	784
6400 series	124
6500 series	297
7050 series	2,906
7250 series	445
8150 series	321
8400 series	235
8800 series	3,975
8820/30 series	2,376
9080 series	98
9200 series	119
9380 series	202
9440 series	596

49,127

Total Units (watches) Distributed	49,127
mCi T gaseous tritium content per unit	25 mCi

Total Tritium Distribution 2014: 1,228,175 mCi