Daniel j. Evans, CHP 8 White Oak Road Ansonia, CT. 06401 June 25, 2015

Shirley Xu

Materials Safety Licensing Branch

Division of Material Safety, States, Tribal and Rulemaking Programs

Office of Nuclear Material Safety and Safeguards

Nuclear Regulatory Commission

## Subject:

Request for additional information correspondence dated June 16, 2015

## Dear Shirley Xu:

There were four points specified in your correspondence requesting additional infoamtion or clarification in relation our application for radioactive material distribution license for the purpose of importing and distributing LUMINOX brand watches. The wristwatches contain radioactive tritium for the purpose of creating a glow-in-the-dark watch face.

1. Please provide the model numbers you will be distributing and the maximum quantity of byproduct material in each model as required by 10 CFR 32.14(b)(1). Additionally, provide the sealed sources model number used in each watch model number and byproduct activity per hand and per dial for each watch model".

Information contained in our original application states maximum quantity of byproduct material and distribution of the material in the watch dial. I have included it here again for purpose of clarity.

| Byproduct Material | Sealed Source Model Number | Activity/Distribution |
|--------------------|----------------------------|-----------------------|
| Hydrogen -3        | Sealed Gaseous Tritium     | <25 mCi per timepiece |
| (Tritium)          | Light Sources (GTLS);      | 5 mCi per hand        |
|                    | (mb-microtec Models        | 15 mCi per dial       |
|                    | X00/A, X00B, and X00C)     |                       |

Reference Docket No. 030-38784 PLUS, LLC Distribution License Application Clarification Page 2

The model numbers for each watch are indicated in the detailed description of each watch as represented in the attachment to this letter. All the models use the sealed sources model numbers indicated in the table above.

2. "In your response dated May 18, 2015, ADAMS Accession No. ML15138A318, item No. 1, you stated that a description of each watch offered for sale is included in an attachment. There is no attachment to the response letter. 10 CFR 32.14(b)(2) requires the details of construction and design of each product. Please submit the details of construction and design of each individual model of the watches you plan to distribute."

I noted in our submission that the description of watches was not correctly labeled as an attachment and was instead included in the body of the submittal. A detailed description of each watch is again included here as a formal labeled attachment.

3. "In the same response letter mentioned above, item No. 2, you stated that the gaseous tritium vial, placed strategically along the watch face and hands, can be verified to have no leakage by visual inspection. 10 CFR 32.14(b)(3) and (d) requires that the method of containment or binding of the byproducts material in the product; and that the byproduct material be properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe the method of containment that will meet the requirements."

Each individual quantity of tritium gas is contained in an individual miniature glass container and placed strategically along the watch face or hands. The individual 'packets' are constructed of sturdy hardened glass vials. The entire watch face is then protected by a sturdy crystal bezel that resists cracking or scratching as you would naturally expect from a wristwatch. The watches are all verified water-resistant to various depths and are recognized as one of the sturdiest and most rugged wrist watches in the industry.

In the event of an individual failure of a vial, the uptake and corresponding whole body dose to the wearer could be computed as a scholastic exercise and have no relevance related to real world total body burden.

4. "In your response letter mentioned above, item No. 3, you stated that manufacturer "Luminox" is noted on watch face. 10 CFR 32.14(b)(6) requires that labeling or marking its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product.

Reference Docket No. 030-38784
PLUS, LLC Distribution License Application Clarification
Page 3

Since Plus LLC is the initial transferor, the labeling of the container will need to identify the initial transferor. Please submit a proposed label for the container (e.g. Drawing, imaging)."

PLUS, LLC will apply a label to the packaging container of the watch. The watch itself is clearly labeled as 'LUMINOX'. Please see attachment two for a visual example of the labeling of the package. The labeling of the watch itself can be identified in attachment one.

Sincerely,

Daniel j. Evans, CHP

Reference Docket No. 030-38784
PLUS, LLC Distribution License Application Clarification
Page 4

Attachment 1 - Details and Description of Each Product





## SENTRY 0200 SERIES, 43 MM

- A VINTAGE-INSPIRED CUSHION-SHAPED WATCH
- -PERFECT TIMEPIECE FOR SPORTING AND OUTDOOR ENTHUSIASTS

| Article | Case  | Dial        | Color | of light | tubes i  | n darkness      | Band/Color |
|---------|-------|-------------|-------|----------|----------|-----------------|------------|
|         |       |             | Bezel | Dial     | Dial     | Hand            |            |
|         |       |             | 1+11H | 3,5,7,9H |          | Hour/Min. 2/4/6 | /8&10/12   |
| 0201.SL | Black | Black/White | SLC3  | Orange   | Green    | Superluminous   | Black PU   |
| 0201.BO | Black | Black/Black | SLC3  | Orange   | Ice Blue | Superluminous   | Black PU   |
| 0215.SL | Black | Black/Red   | SLC3  | Orange   | Green    | Superluminous   | Black PU   |

### **Main Characteristics**

Origin

Always Visible

Size/Diameter

Water Resistance

Movement

Battery/Battery life

Case

Bezel

Case back Crystal

Crown

Height Weight Swiss Made

Constant glow for up to 25 years in any light condition

43mm

100 meters, 10 ATM, 330 feet, individually tested

Ronda 515 HH6 371/45 month

Carbon reinforced PC

Carbon reinforced PC, unidirectional turning bezel, at 12h fitted with colored light tube with sapphire crystal

Carbon reinforced PC

Mineral, especially hardened 316L stainless steel

14,06mm

60q

Standard band

FP.0200.20

Black PU strap with steel signature brushed buckle, 22mm

Standard Giftbox

GBO.L002

Eyewear signature box 160 x 70 x 40mm, black exterior, grey interior

Manual

GGM.L002.GMT



## ANU 4200 SERIES, 45 MM

- ANU = AUTHORISED FOR NAVY USE
- FIRST LINE GEAR FOR ELITE MARITIME COMMANDOS

| Article | Case      | Dial       | Color | of light | tubes i | n darknes | s     | Band/Color  |
|---------|-----------|------------|-------|----------|---------|-----------|-------|-------------|
|         |           |            | Bezel | Dial     | Dial    | Hand      |       |             |
|         |           |            |       | 12H      | 1-11H   | Hour/Min. | Sec.  |             |
| 4221    | Steel PVD | Black/Gray | Green | Orange   | Green   | Green     | Green | Black PU    |
| 4221.CW | Steel PVD | Black/Gray | Green | Orange   | Green   | Green     | Green | Black Nylon |

### Main Characteristics

Origin Swiss Made

Always Visible Constant glow for up to 25 years in any light condition

Size/Diameter 45mi

Water Resistance 200 meters, 20 ATM, 660 feet, individually tested

Movement RONDA 715 Lith HH6
Battery/Battery life CR2060 / 10 years \*

Case 316L stainless steel PVD black with crown protection

Bezel 316L stainless steel, unidirectional turning bezel, at 12h fitted with colored tube with

sapphire crystal

Case back 316L stainless steel

Crystal Sapphire glass, single antireflective coated Crown 316L stainless steel PVD black, screwed

Height 13mm

Weight

## Standard band

FP.8800.20 Black PU signature strap with black PVD steel brushed signature buckle, loop-lock, 23 mm

FN.4220.20 Black nylon strap with nylon web and black PVD brushed steel loops, 23 mm

Standard Giftbox

GBO.L001 Giftbox square, dark gray, 140 x 140 x 100 mm

Manual

GGM.L002.GMT Instruction Manual

<sup>\*</sup> Due to the additional weight of the LLTs on the watch hands, battery life may be shorter



## MODERN MARINER 6250 SERIES, 45MM

- NAUTICAL INSPIRED FEATURES
- 10 YEAR LITHIUM BATTERY
- LEATHER OR BRACELET BAND

| Article | Case        | Dial  | Color    | of light | tubes i  | n darknes | s        | Band/Color           |
|---------|-------------|-------|----------|----------|----------|-----------|----------|----------------------|
|         |             |       | Bezel    | Dial     | Dial     | Hand      |          |                      |
|         |             |       |          | 12H      | 1-11H    | Hour/Min. | Sec.     |                      |
| 6251    | Steel       | Black | Ice Blue | Ice Blue | Green    | Ice Blue  | Ice Blue | Black leather        |
| 6251.BO | Steel Black | Black | Ice Blue | Orange   | Ice Blue | Ice Blue  | Ice Blue | Black leather        |
| 6252    | Steel       | Black | Ice Blue | Ice Blue | Green    | Ice Blue  | Ice Blue | Steel bracelet       |
| 6252.BO | Steel Black | Black | Ice Blue | Orange   | Ice Blue | Ice Blue  | Ice Blue | Black Steel bracelet |
| 6265    | Steel       | Black | Ice Blue | Ice Blue | Green    | Ice Blue  | Ice Blue | Black leather        |

## **Main Characteristics**

Origin

Always Visible

Size/Diameter

Water Resistance

Movement Battery/Battery life

battery/battery ii

Case

Bezel

Case back

Crystal Crown

Height

Weight

Curies Mada

Constant glow for up to 25 years in any light condition

45mm

200 meters, 20 ATM, 600 feet, individually tested

Ronda 715 lith HH6

Lithium CR2016

316L stainless steel with crown protection

316L stainless steel, unidirectional turning bezel,

at 12h fitted with colored light tube with sapphire crystal

316L stainless steel, screwed

Sapphire glass, single antireflective coating

316L st.steel PVD black screwed

10mm 98g

### Standard band

FE.6250.20Q FE.6250.21Q FE.6250.22B FM.L.BRAC.6250

FM.LBRAC.6250.60

Black leather with black stitches, red lining, signature brushed buckle, 24mm
Black leather with red stitches, red lining, signature brushed buckle, 24mm
Black leather with d'grey stitches, IP black signature brushed buckle, 24mm
316L solid brushed steel bracelet, folded signature brushed buckle, 24mm

316L solid brushed steel bracelet IP black, folded signature brushed buckle, 24mm

## Standard Giftbox

GBO.L001

Giftbox square, grey, woven carbon fibre look at top 110 x 110 x 86 mm

### Manual

GGM.L002

Instruction Manual

Edition 03.13

LX\_Portrait Sheet 6250



## F-117 NIGHTHAWK™ 6400 SERIES 45 MM

- ORIGINAL F-117 NIGHTHAWK LICENSED BY LOCKHEED MARTIN
- -ESPECIALLY DESIGNED FOR US AIR FORCE PILOTS FLYING THE F-117 NIGHTHAWK STEALTH JETS
- THE CASE HAS A DETAILED ENGRAVING OF THE F-117 NIGHTHAWK STEALTH JET
- A LARGER, BOLDER, MORE ANGULAR DESIGN THEN 3400 SERIES

| Article | Case            | Dial        | Color    | of light | tubes    | in darkn  | ess      | Band/Color      |
|---------|-----------------|-------------|----------|----------|----------|-----------|----------|-----------------|
|         |                 |             | Bezel    | Dial     | Dial     | Hand      |          |                 |
|         |                 |             |          | 12H      | 1-11H    | Hour/Min. | Sec.     |                 |
| 6402    | Steel PVD Black | Black/White | Green    | Orange   | Green    | Green     | Green    | Steel PVD Black |
| 6402.BO | Steel PVD Black | Black/Black | Ice Blue | Orange   | Ice Blue | Ice blue  | Ice Blue | Steel PVD Black |

#### **Main Characteristics**

Origin Swiss Made

Always Visible Constant glow for up to 25 years in any light condition

Size/Diameter 45mm

Water Resistance 200 meters, 20 ATM, 660 feet, individually tested

Movement Ronda 715 HH6 LITHIUM
Battery/Battery life CR2016/10 years

CRZ010/10 years

Case 316L stainless steel PVD Black
Bezel 316L stainless steel PVD Black, unidirectional turn

316L stainless steel PVD Black, unidirectional turning bezel,

at 12h fitted with colored light tube with sapphire glass crystal

Case back 316L stainless steel PVD black, screwed
Crystal Sapphire, single antireflective coated
Crown 316L st. steel PVD black screwed

Height 12,38mm
Weight 102g

### Standard band

FM.L.BRAC.6400 316L solid stainless steel bracelet with folded signature buckle, all PVD black, 23mm

### Standard Giftbox

GBO.LOO1 Giftbox square, grey, woven carbon fibre look at top 110 x 110 x 86 mm

Manual

GGM.L002 Instruction Manual



## NAVY SEAL COLORMARK 7050 SERIES, 38 MM

| Article | Case  | Dial         | Color    | of light | tubes i  | n darkne: | SS       | Band/Color    |
|---------|-------|--------------|----------|----------|----------|-----------|----------|---------------|
|         |       |              | Bezel    | Dial     | Dial     | Hand      |          |               |
|         |       |              |          | 12H      | 1-11H    | Hour/Min. | Sec.     |               |
| 7051    | Black | Black/White  | Green    | Green    | Green    | Green     | Green    | Black PU      |
| 7051.BO | Black | Black/Black  | Ice Blue | Yellow   | Ice Blue | Ice Blue  | Ice Blue | Black PU      |
| 7065    | Black | Black/Pink   | Ice Blue | Ice Blue | Ice Blue | Green     | Green    | Black PU      |
| 7057.WO | White | White/Silver |          | Ice Blue | White    | White     | White    | White Silicon |

**Main Characteristics** 

Origin

Always Visible

Size/Diameter

Water Resistance

Movement

Battery/Battery life

Case\*

Bezel\*

Case back\*

Height

Weight \*7057.WO

Standard band

FP.7050.20 FP.7050.10

White

Standard Giftbox GBO.L002

Manual GGM.L002.GMT Swiss Made

Constant glow for up to 25 years in any light condition

38mm

200 meters, 20 ATM, 660 feet, individually tested

Ronda 505 HH6 371/56 months

Carbon reinforced PC

Carbon reinforced PC, unidirectional turning bezel,

at 12h fitted with colored light tube with sapphire crystal Carbon reinforced PC

Crystal Mineral, especially hardened

Crystal Mineral, especially nardened Crown 316L stainless steel

11,80mm 39g

fibreglass polymer reinforced

Black PU signature strap with steel brushed signature buckle, Loop-lock, 20mm

White Silicon signature strap with steel brushed buckle

Eyewear signature box 160x70x40mm, black exterior, grey interior





## RECON POINT MAN 8820 SERIES, 45 MM

- THIS WATCH IS A SIMPLE AND EFFICIENT NAVIGATION TOOL FOR LAND USE
- -IT CAN BE USED TO DETERMINE BEARINGS WHENEVER THE SUN IS VISIBLE
- -IT ALSO OFFERS A TACHYMETER SCALED TO MEASURE WALKING SPEEDS
- THE BEZEL'S COMPASS ROSE HELPS TO ESTABLISH THE WEARER'S POSITION AND ORIENTEERING

| Article | Case Di   | al    | Color  | of light | ubes in | darkness |        | Band/Color       |
|---------|-----------|-------|--------|----------|---------|----------|--------|------------------|
|         |           |       | Bezel  | Dial     | Dial    |          | Hand   |                  |
|         |           |       | 12H    | 1-11H    | Hour/Mi | n. Sec.  |        |                  |
| 8821.KM | PC Carbon | Black | Yellow | Ice Blue | Yellow  | Ice Blue | Yellow | Black PU         |
| 8822.MI | PC Carbon | Black | Yellow | Ice Blue | Yellow  | Ice Blue | Yellow | Black PU         |
| 8823.KM | PC Carbon | Black | Yellow | Ice Blue | Yellow  | Ice Blue | Yellow | Nato strap grey  |
| 8824.MI | PC Carbon | Black | Yellow | Ice Blue | Yellow  | Ice Blue | Yellow | Nato strap grey  |
| 8825.KM | PC Carbon | Black | Yellow | Ice Blue | Yellow  | Ice Blue | Yellow | Nato strap green |
| 8826.MI | PC Carbon | Black | Yellow | Ice Blue | Yellow  | Ice Blue | Yellow | Nato strap green |

### **Main Characteristics**

Origin Swiss Made

Always Visible Constant glow for up to 25 years in any light condition

Size/Diameter 45mm

Water Resistance 200 meters, 20 ATM, 660 feet, individually tested

Movement Ronda 515 HH6
Battery/Battery life 395/60 months
Case PC carbon reinforced

Bezel PC carbon reinforced, unidirectional turning bezel, at 12h 1xYellow LLT protected

by metalized sapphire glass window

Case back 316L stainless steel IP black

Crystal Sapphire, single antireflective coating

Crown 316L, steel, IP black, screwed

Height 13,10mm Weight 72g

Standard band

FP.3050.20.BPL 23mm, black PU signature strap with steel brushed signature buckle, Loop-lock FN.3900.80. 2 22mm, grey Nato signature strap with 2 brushed steel loops in front and

z zzmini, grey Nato signature strap with z brushed steel loops in front and

1 brushed steel loop in back

FN.3900.60.2 22mm, green Nato signature strap with 2 brushed steel loops in front and

1 brushed steel loop in back

FN.3900.80.3 22mm, grey Nylon signature strap with 2 brushed steel loops FN.3900.60.3 22mm, green Nylon signature strap with 2 brushed steel loops

Standard Giftbox

GBO.L014 Eyeware pouch for RECON, 170x80x85mm, black

Manual

GGM.L002.GMT Instruction Manual GGM.L019 Manuel RECON

Edition 04.14 LX\_Portrait Sheet 8820



## NAVY SEAL COLORMARK CHRONOGRAPH 3080 SERIES, 44 MM

- THE CRYSTAL IS HARDENED AND TEMPERED. HIGHLY SCRATCH RESISTANT
- -CASE, CASE BACK AND BEZEL ARE MADE OF MOLDED CARBON-REINFORCED POLYMER

| Article | Case  | Dial         | Color    | of light | tubes i  | n darknes | S        | Band/Color         |
|---------|-------|--------------|----------|----------|----------|-----------|----------|--------------------|
|         |       |              | Bezel    | Dial     | Dial     | Hand      |          |                    |
|         |       |              |          | 12H      | 1-11H    | Hour/Min. | Sec.     |                    |
| 3081    | Black | Black/White  | Green    | Green    | Ice Blue | Ice Blue  | Green    | Black PU           |
| 3081.BO | Black | Black/Black  | Ice Blue | Orange   | Ice Blue | Ice Blue  | Ice Blue | Black PU           |
| 3082    | Black | Black/White  | Green    | Green    | Ice Blue | Ice Blue  | Green    | PC/Carbon Bracelet |
| 3082.BO | Black | Black/Black  | Ice Blue | Orange   | Ice Blue | Ice Blue  | Ice Blue | PC/Carbon Bracelet |
| 3083    | Black | Black/Blue   | Yellow   | Yellow   | Ice Blue | Ice Blue  | Yellow   | Black PU           |
| 3089    | Black | Black/Orange | Orange   | Orange   | Ice Blue | Yellow    | Yellow   | Black PU           |

### **Main Characteristics**

Origin

Always Visible Size/Diameter

Water Resistance Movement

Battery/Battery life

Case Bezel

Case back Crystal Crown

Height Weight

Standard band

FP3050.20 FP.3050.23BPL

**Standard Giftbox** 

Manual

GBO.L002

GGM.L001 GGM.L014 Swiss Made

Constant glow for up to 25 years in any light condition

200 meters, 20 ATM, 660 feet, individually tested

Ronda 5030.D 395/54 months PC carbon reinforced

PC carbon reinforced, unidirectional turning bezel,

at 12h fitted with colored light tube with sapphire crystal.

PC carbon reinforced Mineral, especially hardened

316L stainless steel

14,60mm 65g

Black PU signature strap with steel brushed signature buckle, loop-lock, 23mm Black PC & 10% carbon reinforced bracelet with IP black signature buckle, 23mm

Eyewear signature box 160x70x40mm, black exterior, grey interior

Instruction Manual

Chrono Instruction Manual



## NAVY SEAL COLORMARK 3050 SERIES, 44 MM

| Article | Case  | Dial Dial     | Color    | of light | tubes i  | n darknes | i S      | Band/Color            |
|---------|-------|---------------|----------|----------|----------|-----------|----------|-----------------------|
|         |       |               | Bezel    | Dial     | Dial     | Hand      |          |                       |
|         |       |               |          | 12H      | 1-11H    | Hour/Min. | Sec.     |                       |
| 3051    | Black | Black/White   | Green    | Green    | Blue     | Green     | Green    | Black PU              |
| 3051.BO | Black | BlackIce Blue | Orange   | Ice Blue | Ice Blue | Ice Blue  | Ice Blue | Black PU              |
| 3052    | Black | Black/White   | Green    | Green    | Blue     | Green     | Green    | Black Polym.Bracelet  |
| 3052.BO | Black | BlackIce Blue | Orange   | Ice Blue | Ice Blue | Ice Blue  | Ice Blue | Black Polym. Bracelet |
| 3053    | Black | Black/Blue    | Yellow   | Yellow   | Blue     | Yellow    | Ice Blue | Black PU              |
| 3057.WO | White | White/Silver  | Ice Blue | Ice Blue | White    | White     | White    | White PU              |
| 3059    | Black | Black/Orange  | Orange   | Orange   | Yellow   | Yellow    | Green    | Black PU              |
| 3067    | Black | Black/Green   | Ice Blue | Ice Blue | Green    | Ice Blue  | Green    | Black PU              |

### **Main Characteristics**

Origin Swiss Made

Always Visible Constant glow for up to 25 years in any light condition

Size/Diameter 44mn

Water Resistance 200 meters, 20 ATM, 660 feet, individually tested

Movement RONDA 515 HH6
Battery/Battery life 395/60 months

Case PC carbon reinforced (white case/bezel/case back: PC glass-fibre reinforced)

Bezel PC carbon reinforced, unidirectional turning bezel,

at 12h fitted with colored light tube with sapphire crystal.

Case back PC carbon reinforced
Crystal Mineral, especially hardened

Crown 316L stainless steel

Height 13,88mm Weight 65g

#### Standard band

FP.3050.20

Black PU signature strap with steel brushed signature buckle, loop-lock, 23mm
FP.3050.10

White PU signature strap with steel brushed signature buckle, loop-lock, 23mm
FP.3050.23BPL

Black Polymer bracelet with IP black signature buckle, 23mm

#### Standard Giftbox

GBO.L002 Eyewear signature box 160x70 x40mm, black exterior, grey interior

### Manual

GGM.L002 Instruction Manual

Edition 03.14 LX\_Portrait Sheet 3050



## ORIGINAL NAVY SEAL 3000 SERIES, 43 MM

| Article | Case  | Dial         | Color    | of light | tubes i  | n darknes | S      | Band/Color |
|---------|-------|--------------|----------|----------|----------|-----------|--------|------------|
|         |       |              | Bezel    | Dial     | Dial     | Hand      |        |            |
|         |       |              |          | 12H      | 1-11H    | Hour/Min. | Sec.   |            |
| 3001    | Black | Black/White  | Green    | Orange   | Green    | Green     | Green  | Black PU   |
| 3001.BO | Black | Black/ Black | Ice Blue | Yellow   | Ice Blue | Ice Blue  | Yellow | Black PU   |
| 3003    | Black | Blue/White   | Green    | Orange   | Green    | Green     | Green  | Black PU   |

**Main Characteristics** 

Origin Swiss Made

Always Visible Constant glow for up to 25 years in any light condition

Size/Diameter 43m

Water Resistance 200 meters, 20 ATM, 660 feet, individually tested

Movement RONDA 515 HH6
Battery/Battery life 395/60 months

Case Carbon reinforced PC

Bezel Carbon reinforced PC, unidirectional turning bezel, at 12h fitted with colored tube with sapphire crystal

Case back Carbon reinforced PC
Crystal Mineral, especially hardened

Crystal Mineral, especially harden
Crown 316L stainless steel

Height 10,97mm Weight 46g

Standard band

FP.L.DPB Black PU strap with steel signature buckle, 22mm

FP.3000.21HPL Black PU strap with steel signature buckle in IP Gun plated, 22mm

Standard Giftbox

GBO.L002 Eyewear signature box 160x70x40mm, black exterior, grey interior

Manual

GGM.L002.GMT Instruction Manual



## ATACAMA FIELD CHRONOGRAPH ALARM 1940 SERIES, 45 MM

- -ATACAMA DESERT IN CHILE IS ONE OF THE DRIEST AREAS IN THE WORLD
- -RUGGED APPEAL TO CATCH THE FEELING OF THIS DESERT
- DISTRESSED LEATHER STRAPS AND ONE BRACELET VERSION

| Article | Case      | Dial         | Color | of light | tubes | in darkne | SS   | Band/Color       |
|---------|-----------|--------------|-------|----------|-------|-----------|------|------------------|
|         |           |              | Bezel | Dial     | Dial  | Hand      |      |                  |
|         |           |              |       | 12H      | 1-11H | Hour/Min. | Sec. |                  |
| 1941    | PVD Gun   | Black carbon |       | Orange   | Green | Green     |      | Black leather    |
| 1941.BO | PVD Black | Black carbon |       | Orange   | Blue  | Blue      |      | Black leather    |
| 1942    | PVD Gun   | Black carbon |       | Orange   | Green | Green     |      | Steel bracelet   |
| 1943    | PVD Gun   | Blue         |       | Orange   | Green | Green     |      | Grey leather     |
| 1945    | PVD Black | Black/Brown  |       | Orange   | Green | Green     |      | Brown leather    |
| 1947    | PVD Gun   | Ivory/Brown  |       | Orange   | Green | Green     |      | D. brown leather |

**Main Characteristics** 

Origin

Always Visible

Size/Diameter Water Resistance

Movement

Battery/Battery life

Case Bezel

Case back Crystal Crown

Height Weight Swiss Made

Constant glow for up to 25 years in any light condition

45mm

100 meters, 10 ATM, 330 feet, individually tested

RONDA 5130.D Chronograph Alarm

395/50 months

316L PVD black or PVD gun

316L PVD black or PVD gun, screwed, soundbox

Sapphire, single antireflective coated 316L PVD black or PVD Gun, screwed

13mm 80g

Standard band

FM.L.BRAC.1920.IPH FE.1920.20H.80RI FE.1920.20B.60RI FE.1920.71B.60RI FE.1920.72H.80RI FE.1920.80H.80RI 316L solid steel bracelet PVD Gun plated, with solid signature buckle, 26mm black leather, grey stitches, 2 PVD Gun brushed rivets and signature buckle, 26mm black leather, dark grey stitches, 2 PVD black brushed rivets and signature buckle, 26mm brown leather, d'brown stitches, 2 steel PVD black brushed rivets and signature buckle, 26mm dark brown leather, creamy stitches, 2 PVD gun brushed rivets and signature buckle, 26mm grey leather, dark grey stitches, 2 PVD gun brushed rivets and signature buckle, 26mm

**Standard Giftbox** 

GBO.L001

Giftbox square, grey woven carbon fibre look at top, size 110 x 110 x 84mm

Manual

GGM.L002.GMT GGM.L003



## ATACAMA FIELD DAY DATE 1920 SERIES, 45 MM

- -ATACAMA DESERT IN CHILE IS ONE OF THE DRIEST AREAS IN THE WORLD
- -RUGGED APPEAL TO CATCH THE FEELING OF THIS DESERT
- DISTRESSED LEATHER STRAPS AND ONE BRACELET VERSION

| Article | Case      | Dial         | Color | of light | tubes | n darkness |      | Band/Color       |
|---------|-----------|--------------|-------|----------|-------|------------|------|------------------|
|         |           |              | Bezel | Dial     | Dial  | Hand       |      |                  |
|         |           |              |       | 12H      | 1-11H | Hour/Min.  | Sec. |                  |
| 1921    | PVD Gun   | Black carbon |       | Orange   | Green | Green      |      | Black leather    |
| 1921.BO | PVD Black | Black carbon |       | Orange   | Blue  | Blue       |      | Black leather    |
| 1922    | PVD Gun   | Black carbon |       | Orange   | Green | Green      |      | PVD Gun          |
| 1923    | PVD Gun   | Blue         |       | Orange   | Green | Green      |      | D. Grey Leather  |
| 1925    | PVD Black | Black/Brown  |       | Orange   | Green | Green      |      | Brown leather    |
| 1927    | PVD Gun   | Ivory/Brown  |       | Orange   | Green | Green      |      | D. Brown leather |

**Main Characteristics** 

Origin

**Always Visible** 

Size/Diameter

**Water Resistance** 

Movement

Battery/Battery life

Case

Bezel

Case back

Crystal

Crown

Height

Weight

Swiss Made

Constant glow for up to 25 years in any light condition

45mm

200 meters, 20 ATM, 660 feet, individually tested

RONDA 517 Day-Date, HH6

395/50 months

316L PVD black or PVD gun

316L stainless steel PVD black or gun, screwed, sapphire crystal

Sapphire, single antireflective coated

316L PVD black or PVD Gun, screwed

13mm

80g

#### Standard band

FM.L.BRAC.1920.IPH FE.1920.20H.80RI FE.1920.20B.60RI FE.1920.71B.60RI FE.1920.72H.80RI

black leather, grey stitches, 2 PVD Gun brushed rivets and signature buckle, 26mm black leather, dark grey stitchs, 2 PVD black brushed rivets and signature buckle, 26mm brown leather, d'brown stitches, 2 steel PVD black brushed rivets and signature buckle, 26mm dark brown leather, creamy stitches, 2 PVD Gun brushed rivets and signature buckle, 26mm grey leather, dark grey stitches, 2 PVD Gun brushed rivets and signature buckle, 26mm

#### Standard Giftbox

FE.1920.80H.80RI

GBO.L001

Giftbox square, grey woven carbon fibre look at top, size 110 x 110 x 84mm

316L solid steel bracelet PVD Gun plated, with solid signature buckle, 26mm

#### Manual

GGM.L002.GMT



## FIELD AUTOMATIC DAY DATE 1800 SERIES, 43 MM

- AUTOMATIC DAY-DATE MOVEMENT
- SEE-THROUGH CASE BACKS TO VIEW THE MOVEMENT
- -SMOOTH BUFFALO LEATHER STRAPS

| Article | Case      | Dial  | Color | of light | tubes i  | n darkness     | Band/Color    |
|---------|-----------|-------|-------|----------|----------|----------------|---------------|
|         |           |       | Bezel | Dial     | Dial     | Hand           |               |
|         |           |       |       | 12H      | 1-11H    | Hour/Min. Sec. |               |
| 1801    | Steel     | Black |       | Orange   | Green    | Green          | Brown leather |
| 1801.BO | PVD Black | Black |       | Yellow   | Ice Blue | Ice Blue       | Black leather |

### **Main Characteristics**

Origin Swiss Made

Always Visible Constant glow for up to 25 years in any light condition

Size/Diameter 43m

Water Resistance 100 meters, 10 ATM, 330 feet, individually tested

Movement ETA 2878 Automatic Day-Date, HH5

Battery/Battery life

Case 316L stainless steel or PVD black

Bezel 316L stainless steel or PVD black, fix bezel

Case back 316L stainless steel or PVD black, screwed, sapphire crystal

Crystal Sapphire, single antireflective coated

Crown 316L stainless steel or PVD black, screwed

Height 13,3mm Weight 91g

### Standard band

FE.1800.20Q black leather, creamy stitches, steel brushed signature buckle, 23mm black leather, d'grey stitches, steel brushed signature buckle, 23mm

Standard Giftbox

GBO.L017 Black wooden box, black PU with red oval pillow for watch, size 240 x 140 x 97 mm

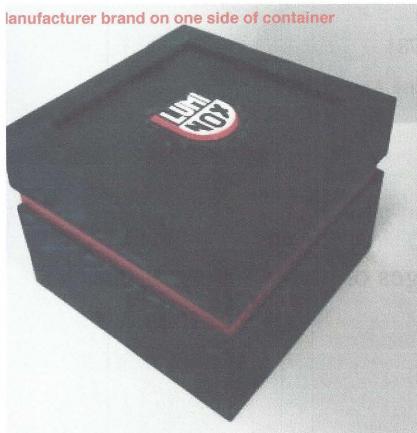
Manual

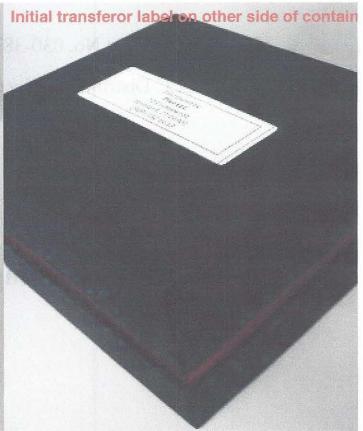
GGM.L002.GMT Instruction Manual GGM.L013 Automatic Manual

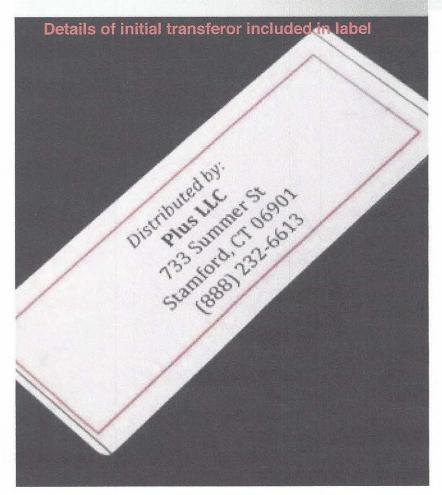
Reference Docket No. 030-38784

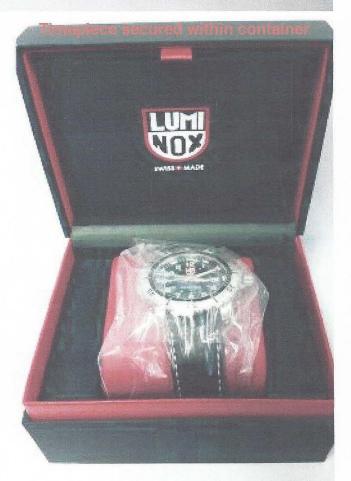
PLUS, LLC Distribution License Application Clarification

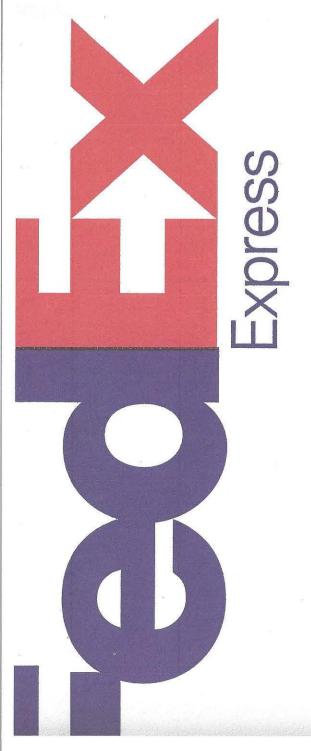
Attachment 2 – Images of Container with Labeling













ORIGIN ID:ZSMA (+00) (34-1090 LUZ MORALES LUXIM CORPORATION 3542 BASSETT STREET ACTWGT: 1.0 LB MAN CAD: 0338379/CAFE2807

SANTA CLARA, CA 95054 UNITED STATES US BILL SENDER

SHIRLEY XU

U.S. NUCLEAR REGULATORY COMMISSION MAIL STOP: T8E18 OFFICE OF NMSS

WASHINGTON DC 205550001

FedEx

Express

WED - 01 JUL AF

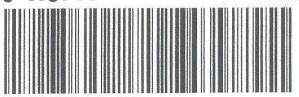
THU - 02 JUL AA

\*\* 2DAY \*\*

SC NSFA

TRK# 6096 6797 0950

20555 DC-US IAD



FID 5030252 30JUN15 COAA 537C1/R566/FF4

R1609 1 D 16:30 0050 07.02