



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 5, 2015

mb-microtec
ATTN: Timothy Brandon
1093 Ridge Road
Windsor, ME 04363

SUBJECT: SECOND REQUEST FOR ADDITIONAL INFORMATION REGARDING MB-MICROTEC AMENDMENT REQUEST TO EXEMPT DISTRIBUTION LICENSE

Dear Mr. Brandon,

The U.S. Nuclear Regulatory Commission (NRC) staff has reviewed your letter dated October 6, 2015, Agencywide Documents Access and Management System (ADAMS) Accession No. ML15280A061, which responds to our first request for additional information dated September 29, 2015 (ADAMS Accession No. ML15271A028). The staff has determined that additional information is needed. In order to continue our review, please address the issues listed below.

1. In our letter dated September 29, 2015, we requested a list of all the watch manufacturers and watch brands that are being distributed by mb-microtec under exempt distribution license 18-23712-01E. Also please provide the model number for each watch brand. In your response dated October 6, 2015, you provided a table that includes manufacturer's name, make, brand and model of watches that were distributed by mb-microtec in 2015. Please clarify the following information:
 - a. Please provide a list of all manufacturers mb-microtec has distributed watches for since your last inspection in 2011.
 - b. Please clarify what is the difference between make and brand.
 - c. You state that all models in the table are classified as mb-microtec model 100/1. Please note that is conflictive to have two models for the same watch. Please clarify if all watches are model 100/1 and the information in the table under "model" is a description that falls under model 100/1 (e.g. sub-model).
 - d. There are some brands and models that are missing in the table, please provide a table with all the requested information.
 - e. Please clarify the method of labeling of watches assemble by other manufactures besides mb-microtec.
 - f. Please confirm that mb-microtec (U.S.) periodically audits mb-microtec, ag (Switzerland), and describe the process and at what frequency do the audits occur.
2. Mb-microtec SSD registration certificate NR-0446-D-103-E authorizes the manufacturing of self-luminous timepieces model 100/1, 100/2, 100/3, 100/4 and 100/5 using mb-microtec tritium sealed sources model 400/1, 400/2 and 400/3. Mb-microtec's website contains information regarding the tritium sources used in watches. The website referred to the tritium sources reference numbers, such as T6045-1, T6040-1, T6080-1, etc. Please clarify what is the relationship, if any, between the reference numbers in mb-microtec website and the model numbers 400/1, 400/2 and 400/3.

Any correspondence regarding your application, should reference the control number specified below. Please submit the requested information within 30 days of the date of this letter. If we have not received complete information within 30 days of the date of this letter, we will consider your application as having been abandoned by you. This is without prejudice to the submission of a complete application.

Please be aware that upon your request, proprietary information submitted to the NRC may be withheld from public disclosure. To do this, you must follow the procedures in 10 CFR 2.390(b) including requesting withholding at the time the information is submitted and complying with the document marking and affidavit requirements set forth in 10 CFR 2.390 (b)(1).

In accordance with 10 CFR 2.390, a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

If you have any questions regarding the exempt distribution license, please contact me at (301) 415-6004 or email at Hector.Rodriguez-Luccioni@nrc.gov.

Sincerely,

/RA/ [Original Signed By]

Hector Rodriguez-Luccioni, Ph.D.
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal,
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

Docket No. 030-30433
Mail Control No. 588781

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Hector Rodriguez-Luccioni, Ph.D.
 Materials Safety Licensing Branch
 Division of Material Safety, State, Tribal,
 and Rulemaking Programs
 Office of Nuclear Material Safety
 and Safeguards

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DATE	10/27/15	11/02/2015	11/02/2015	11/ /2015	11/ /2015

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