

**From:** [MaxRLuminox@aol.com](mailto:MaxRLuminox@aol.com)  
**To:** [Reber, Eric](mailto:Reber_Eric)  
**Subject:** Re: Request for revised 2014 exempt distribution report Lumondi  
**Date:** Thursday, March 12, 2015 12:08:33 PM  
**Attachments:** [2014 Tritium Distribution Report revised.doc](#)

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Mr. Rieber,

Please see attached, which we will forward in hard copy to the office address in your email.

1. 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 2013." **Please confirm whether the year "2013" was an error.**

**Yes, this was an error that was corrected in a follow-up email to Mr. Munoz.**

2. Usage/transfer statement has been updated to identify timepieces/watches as the product containing 25 millicuries being transferred.

3. Lumondi Inc is the corporate name; however we do business as the Luminox Watch Company. I have included this in my signature to avoid future confusion.

On a side note, I wanted you to know that I attempted to return your phone calls last month but if I am not mistaken the phone never went to a voice mail.....just rang & rang. Hopefully this is corrected.

Have a great day.

Max W. Robertson  
Director of U.S. Operations  
Luminox Watch Company  
415-455-9500 X 108  
415-634-2716 (fax)  
415-720-3590 (m)  
[www.luminox.com](http://www.luminox.com)

In a message dated 3/12/2015 7:30:21 A.M. Pacific Daylight Time, Eric.Reber@nrc.gov writes:

Dear Mr. Robertson,

I've reviewed your exempt distribution report dated January 8, 2015.

Please revise and resubmit your report to indicate that the products are transferred for use under 10 CFR 30.15, giving the specific paragraph designation (for example, 10 CFR 30.15(a)(8) for electron tubes), or equivalent regulations of an Agreement State. Your letter dated January 8, 2015 included the sentence "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 2013." Please confirm whether the year "2013" was an error.

Further information about the requirements that apply to annual reports of exempt distribution can be found in the attached Regulatory Issue Summary.

The name of the licensee on License No. 04-23929-01E is Lumondi, Inc. The cover letter of your report dated January 8, 2015 indicated that you are employed by Luminox Watch Company and it was written on Luminox stationary. In your response, please explain the relationship between Lumondi and Luminox.

A hard copy of your revised report should be addressed and sent to:

ATTN: Document Control Desk/Exempt Distribution  
Director, Office of Nuclear Material Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

If you have any questions, please feel free to contact me.

Regards,

Eric

Eric H. Reber  
General Engineer/Project Manager  
Materials Safety Licensing Branch  
Division of Material Safety, State, Tribal, and Rulemaking Programs  
US Nuclear Regulatory Commission  
Washington, DC 20555-0001  
Tel: +1 (301) 415-5608  
Office: T-8i04

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