

mb-microtec

self activated illumination

November 10, 2015

Hector Rodriguez-Luccioni
Licensing Branch Division of Materials Safety and State Agreements
Office of Federal and State Materials
and Environmental Management Programs
United States Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: RAI-2

Dear Mr. Rodriguez, In regard to your request for additional information in response to mb microtec's request for amendment to its distribution license 18-23712-01E, Docket Number: 030-30433,

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 18-23712-01 E. 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.*

mb microtec response:

- a. The manufacturers for which mb microtec has imported since 2011 are:
 - i. Bonding
 - ii. Vostok
 - iii. Frederique Constant
 - iv. Hingtex
 - v. Solar
 - vi. Zeittechnik Fink
 - vii. Spearmark
 - viii. Keytime
 - ix. ITS Time Ltd

- b. Make is the company for which the watch is made, and brand is the family of watches made. For instance, Bonding manufactures watches for Armourlite. Armourlite then may have more than one brand (or family) of watch, such as Isobrite.
- c. You are correct: 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. To the best of our knowledge, there are no brands for Deep Blue and Frederique Constant; therefore these columns were left blank.
- e. All manufacturers label the watch back with mb-microtec. The watches also contain labels of H-3, T-25 (or T-100 as appropriate), and/or a trefoil. The labels are consistent with the information included in the SSD for the watches.
- f. mb microtec (USA) does periodically audit mb microtec ag. The process is to review documentation, processes, quality checks, testing, etc. and verify that they meet the NRC's requirements. The frequency is approximately every 2-3 years.

2. *Mb-microtec SSD registration certificate NR-0446-D-1 03-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.*

mb microtec response: There is no direct correlation between the model numbers (400/1, etc.) and the reference numbers (T6045-1, etc).

I trust this information suffices to answer your questions. However, if you have further questions, please contact me at tbrandon@diligistics.com.

Sincerely,



Timothy Brandon
RSO for mb microtec USA