

From: O' HalloranTom <Tom.Ohalloran@Luma-Group.com>
Sent: Friday, November 20, 2015 4:22 PM
To: Reber, Eric
Subject: [External_Sender] RE: RE: RE: Request for report of exempt transfers in 2015; Luma America Corp; License No. 04-23924-01E; License Termination Request
Attachments: Luma America Corp_Material Transfer Report_2015.pdf

Hello Eric,
Attached is a copy of the transfer report.
Thanks, Tom

From: Reber, Eric [<mailto:Eric.Reber@nrc.gov>]
Sent: Thursday, November 19, 2015 2:32 PM
To: O' HalloranTom
Subject: RE: RE: RE: Request for report of exempt transfers in 2015; Luma America Corp; License No. 04-23924-01E; License Termination Request

Hello Tom,

Sending a scan to me will be sufficient.

I look forward to receiving your report.

Regards,
Eric

From: O' HalloranTom [<mailto:Tom.Ohalloran@Luma-Group.com>]
Sent: Thursday, November 19, 2015 5:31 PM
To: Reber, Eric <Eric.Reber@nrc.gov>
Subject: [External_Sender] RE: RE: Request for report of exempt transfers in 2015; Luma America Corp; License No. 04-23924-01E; License Termination Request

Hi Eric,
I will post out the report to you tomorrow.
Should I also post it to your attention or will the Document Control Desk/Exempt Distribution be enough.
Best Regards, Tom

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

From: Reber, Eric [<mailto:Eric.Reber@nrc.gov>]
Sent: Monday, November 16, 2015 1:27 PM
To: O' HalloranTom
Cc: Tony McGettigan
Subject: RE: RE: Request for report of exempt transfers in 2015; Luma America Corp; License No. 04-23924-01E; License Termination Request

Great. I look forward to receiving your report.

From: O' HalloranTom [<mailto:Tom.Ohalloran@Luma-Group.com>]

Sent: Monday, November 16, 2015 4:25 PM

To: Reber, Eric <Eric.Reber@nrc.gov>

Cc: Tony McGettigan <Tony.McGettigan@Luma-Group.com>

Subject: [External_Sender] RE: Request for report of exempt transfers in 2015; Luma America Corp; License No. 04-23924-01E; License Termination Request

Dear Eric,

I will get the report to you by the end of the week.

Best Regards, Tom

(408) 391-0548

From: Reber, Eric [<mailto:Eric.Reber@nrc.gov>]

Sent: Monday, November 16, 2015 12:55 PM

To: O' HalloranTom

Cc: Tony McGettigan

Subject: Request for report of exempt transfers in 2015; Luma America Corp; License No. 04-23924-01E; License Termination Request

Dear Mr. O'Halloran,

As we discussed via telephone today, prior to termination of your license you must submit a report of your transfers of license-exempt radioactive material in 2015. You indicated that you have not yet provided your 2015 report, but that you would be able to file a report in the next few days. Please provide your report without delay so that we may process your license termination in a timely fashion. Information concerning the requirements for such reports is provided below.

License No. 04-23924-01E authorizes the distribution of exempt products pursuant to 10 CFR 32.14. The record keeping and reporting requirements for such licenses are located in 10 CFR 32.16. The reporting requirements are detailed and prescriptive and should be followed fastidiously.

10 CFR 32.16 Certain items containing byproduct material: Records and reports of transfer.

(a) Each person licensed under § 32.14 shall maintain records of all transfers of byproduct material and file a report with the Director of the Office of Nuclear Material Safety and Safeguards by an appropriate method listed in § 30.6(a) of this chapter, including in the address: ATTN: Document Control Desk/Exempt Distribution.

(1) The report must clearly identify the specific licensee submitting the report and include the license number of the specific licensee.

(2) The report must indicate that the products are transferred for use under § 30.15 of this chapter, giving the specific paragraph designation, or equivalent regulations of an Agreement State.

(b) The report must include the following information on products transferred to other persons for use under § 30.15 or equivalent regulations of an Agreement State:

(1) A description or identification of the type of each product and the model number(s), if applicable;

(2) For each radionuclide in each type of product and each model number, if applicable, the total quantity of the radionuclide; and

(3) The number of units of each type of product transferred during the reporting period by model number, if applicable.

(c)(1) The licensee shall file the report, covering the preceding calendar year, on or before January 31 of each year. In its first report after December 17, 2007, the licensee shall separately include data for transfers in prior years not previously reported to the Commission.

(2) Licensees who permanently discontinue activities authorized by the license issued under § 32.14 shall file a report for the current calendar year within 30 days after ceasing distribution.

(d) If no transfers of byproduct material have been made under § 32.14 during the reporting period, the report must so indicate.

(e) The licensee shall maintain the record of a transfer for one year after the transfer is included in a report to the Commission.

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

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

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).

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

Re: License Number 04-23924-01E

Dear Mr. Reber,

This letter is in response to requests for all material transfer reports for Luma America Corp. for 2015.

Please see below the required information requested.

1. NRC License Number 04-23924-01E

Licensee:

Luma America Corporation

3542 Bassett St.

Santa Clara, 95054

Contact RSO: Tom O'Halloran (408) 391-0548

2. Luma manufactured quartz light bulbs for high intensity light sources using byproduct material Krypton-85 under the following authorization from the NRC.

Pursuant to Section 32.14, 10 CFR Part 32, "Specific Domestic licenses to Manufacture or Transfer Certain items containing byproduct material"; the licensee is authorized to distribute electron tubes, containing not more than 30 microcuries of Krypton-85; to persons exempt from licensing pursuant to Section 30.15, 10 CFR Part 30, or equivalent provisions of the regulations of any Agreement State.

1. Luma manufactures high intensity light sources bringing clean lighting solutions to general and specialty lighting.

At the heart of the light source is the bulb sub-assembly where a sealed bulb is embedded in a dielectric material. The dielectric material serves two purposes; first as a waveguide for the RF

energy transmitted by the power amplifier circuit and second as an electric field concentrator that focuses energy in the bulb. The energy from the electric field rapidly heats the material in the bulb to a plasma state that emits light of high intensity and full spectrum.

The model numbers are as follows with application:

- A.** LIFI INT 30-02, 30-03, 30-04 - all used in instrumentation applications such as medical instruments, inspection systems.
- B.** LIFI STA 40-01, 40-02, - used in general lighting applications such as parking lights, high bay fixtures and used in architectural lighting applications, and entertainment lighting applications.
- C.** STA 41-01, 02- used in general lighting applications such as parking lights, high bay fixtures and used in architectural lighting
- D.** STA 25-02, - used in general lighting applications such as parking lights, high bay fixtures and used in architectural lighting

2. Krypton-85 in gas form is used in each bulb with an activity level ranging from 113nCi to 1110nCi per bulb. The attached table breaks down the activity for each part number.

	Part Number	Activity (nCi) per Lamp
A	INT 30-02,30-03, 30-04	113
B	STA 40-01, STA-40-02	900
C	STA-41-01, 41-02	1110
D	STA 25-02	494

3. A total of 6,273 light sources were shipped to customers during 2015.

This corresponds to a total activity of approximate **0.005055 Curie** of Krypton-85.

2015 Luma America Corp. Lamp Shipments

Part Number	Qty Lamps	Activity (nCi) per Lamp	Total Activity / Part Number	
INT 30-02,30-03, 30-04	451	113	50963	
STA 40-01, STA-40-02	305	900	274500	
STA-41-01, 41-02	3254	1110	3611940	
STA 25-02	2263	494	1117922	
Total Qty. Lamps	6273	Total Activity	5055325	nCi
			0.005055325	Curie

If you require any other information, please do not hesitate to contact me at (408) 391-0548.

Sincerely yours,

Tom O' Halloran, RSO *Tom O' Halloran* 11/20/2015.

Tom.Ohalloran@Luma-Group.com

Luma Corporation