

From: Reber, Eric
Sent: Wednesday, February 03, 2016 10:20 AM
To: 'Charlotte Groves'
Cc: Fred; Beth
Subject: Request for 2nd Revision to 2015 Federal Annual Material Report - Transfer of Byproduct (Krypton 85 Gas); Worldwide Specialty Lamp; License No. 10-23967-01E
Attachments: RIS 2014-10 Exempt Distribution.pdf

Dear Ms. Groves,

I've reviewed your revised exempt distribution report that was attached to your email dated February 2, 2016.

In your report, you indicated that your lamps contain less than 25 kBq of Kr-85. The reporting requirements in 10 CFR 32.16(a) refer to the actual amount of radioactivity that is distributed; therefore, you should report the actual amount of Kr-85 that is distributed and not a value based on a maximum amount. We realize that it would be difficult to exactly determine the amount of radioactivity in each lamp and we don't expect that you would do this. However, we want to get an idea of the amounts of radioactivity in license-exempt products that is more specific than knowing the maximum amounts possible. In your case, it would be reasonable that you contact the manufacturer and ask them for an approximate amount of Kr-85 that they put in their lamps. For such small amounts of radioactive material, there will be some lamp-to-lamp variability in the amount of radioactivity in each product, but they should be able to give you some estimate of the amount of radioactivity in each model. Please revise and resubmit your report to include this specific information. Also, your reports should indicate that your products containing Kr-85 are transferred for use under 10 CFR 30.15(a)(8)(iv). This is a more specific regulatory citation than the one I had previously suggested.

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 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

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From: Charlotte Groves <charlotte@wslusa.com>

Sent: Tuesday, February 02, 2016 9:48 AM

To: Reber, Eric

Cc: Fred; Beth

Subject: [External_Sender] 2015 Federal Annual Material Report - Transfer of
Byproduct (Krypton 85 Gas).xlsx

Attachments: image001.jpg; 2015 Federal Annual Material Report - Transfer of Byproduct
(Krypton 85 Gas).xlsx

2015 Federal NRC Transfer of Byproduct (Krypton 85 Gas) Material Report

(Sales of Imported lamps containing Krypton 85 Gas)

Due Date: Mail & Email No Later than January 31st, 2016

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

EMAIL: Eric.Reber@nrc.gov

Licensee: *Worldwide Specialty Lamp*
 6759 Oak Ridge Commerce Way SW
 Austell, Georgia 30168

License #: 10-23967-01E

Phone: 770-948-0755 Ext. 24

Fax: 770-948-0689

Email: charlotte@wslusa.com

Amount of radionuclide per lamp: (Amount listed below is specified in production, actual levels are less in lamps)

Each lamp contains up to 25 kBq/l (0.005000 to 0.010000dmq) of Krypton 85 gas sealed inside each lamp/bulb

These products were transferred for use under 10 CFR30.15(a)(8) as required by 10 CFR 32.16(a)(2).

SERIES	ITEM NUMBERS & DESCRIPTIONS	Qty	kBq	Total kBq
HP 1000	004.0013 LET 1000w 220v wire lead		25	
	004.0037 LET 1000w-1500w 220v	42	25	1050
	004.0038 LET 1000w 380v wire lead		25	
	004.0041 LET 1000w single ended Corona	140	25	3500
	004.0047 LET 1000w Keyed Base	170	25	4250
	23447 HPA 1040SE FX Single ended Keyed Base		25	
	23451 HPA 1010 SE FX		25	
	23452 HPA 1001R		25	
HP 1200	23046 HPA 1200S FX 1000w/220v wirelead		25	
	23051 HPA 1220FX 1000w 380v 4pk wirelead		25	
HP 1400	004.0049 LET 1400w ISO wirelead replacement		25	
	004.0052 LET 1400w Kalfasun replacement		25	
	004.0101 LET 80-120 SE-K 500w-1400w		25	
HP 1500	004.0045 LET 1510w		25	
	004.0048 LET 1530w		25	
HP 200	23047 HPA 250-500 30SD FX		25	
	913134045 Cleo HPA 250-500 SE FX		25	
HP 2000	004.0029 LET 2000w 380v wirelead		25	
	004.0039 LET HPA 2000w/220v wire lead		25	
	23052 HPA 2020 S/FX 2000W 380V wirelead		25	
	920671845 CLEO HPA 2040w S FX		25	
HP 300	004.0040 LET 300w-500w SE		25	
HP 400	004.0004 LET 400w R7s		25	
	004.0005 LET 400w leads		25	
	23040 HPA 400w 30SL		25	
	23042 HPA 400w 30 SDL		25	
	23043 HPA 400 S Long Philips Corona		25	
	23049 HPA 400w/30S		25	
	938358945 HPA 400/30SD		25	
	004.0003 LET 500w leads		25	
HP 500	004.0006 LET 500w R7s		25	
	004.0105 LET Corona 500-700 SEK Single Ended Keyed Base		25	
	004.0042 LET 610w - Blade		25	
HP 600	004.0043 LET 620w		25	
	004.0044 LET 630w	106	25	2650
	004.0070 LET 700w R7s	67	25	1675
HP 700	23450 HPA 700/800 FX C		25	
		525		13125
		Total		Total
		Lamps		kBq