



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

February 11, 2016

Mr. Barry Hallock
EHS Operations Leader
General Electric Company
1975 Noble Road, Building 114
East Cleveland, OH 44112

SUBJECT: GENERAL ELECTRIC COMPANY, SECOND REQUEST FOR ADDITIONAL
INFORMATION, LICENSE RENEWAL REQUEST

Dear Mr. Hallock:

This refers to your letter dated January 22, 2016, which responded to our request for additional information dated December 11, 2015.

The regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) 32.14(b) state, in part, that an application for a specific license to initially transfer for sale or distribution products containing byproduct material for use pursuant to 10 CFR 30.15 will be approved if the applicant submits sufficient information regarding the product pertinent to evaluation of the potential radiation exposure. In order to continue our review of your application, we need the following additional information.

1. The regulations in 10 CFR 32.14(b)(2) and (3) require applicants to submit information about the details of the construction and design of each product, and the method of containment or binding of the byproduct material in the product.

Item 2 and Attachment A of your letter provide information about the details of the construction and design and method of containment or binding of the byproduct material for lamps that contain Kr-85 in an arc tube. In addition to arc tubes containing Kr-85, Item 5.b of your renewal application dated September 30, 2015 also listed Kr-85 gas contained in glow switches and Pm-147 plated on wire in glow switches; however, for these products, you have not provided information about the details of their construction and design, and the method of containment or binding of the byproduct material.

For glow switches containing Kr-85 gas and glow switches containing Pm-147 that is plated on wire, please provide the details of their construction and design, and the method of containment or binding of the byproduct material.

2. The regulations in 10 CFR 32.14(b)(6) require applicants, in part, to submit information about the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product.

- a. Item 2 of your letter requests an exemption from the labeling requirements in 10 CFR 32.15(d) for certain lighting products containing Kr-85 with design limitations that make it difficult or impossible to place a "Kr-85" label on the product itself. In such cases, alternate labeling or marking for each unit should be placed as close as possible to the product. For example, for products that are too small to label, the label should be placed on the next smallest container, such as the bubble pack containing the product.

For the products for which you have requested an exemption from the labeling and marking requirements in 10 CFR 32.15(d), please describe alternate labeling or marking for each unit that will be implemented. (Please note that your exemption request would only apply to the labeling or marking of each product; there is a separate requirement concerning the marking and labeling of the containers for these products).

- b. You requested an exemption from the labeling and marking requirements for certain lighting products; however, concerning the other products that you wish to distribute and the containers of the products for which an exemption would apply, you have not provided information about the proposed method of labeling or marking of these items.

Please provide information about the proposed method of labeling or marking so that the manufacturer or initial transferor of the product and the byproduct material can be identified for each of the following:

- i. glow switches containing Kr-85 and their containers
 - ii. glow switches containing Pm-147 that is plated on wire and their containers
 - iii. arc tubes containing Kr-85 that would not fall under the labeling and marking exemption and their containers
 - iv. containers of the products to which the labeling and marking exemption would apply
4. The regulations in 10 CFR 32.14(b)(7) require that applicants submit information about the radiation level and the method of measurement at 1 centimeter from any surface when measured through 7 milligrams per square centimeter of absorber. Please note that 10 CFR 30.15(a)(8) requires that such levels of radiation may not exceed 1 millirad per hour.

Item 4 of your letter provides information about the radiation level and the method of measurement for lighting products that contain Kr-85; however, you did not provide such information concerning glow switches containing Pm-147 plated on wire as listed in Item 5.b of your renewal application dated September 30, 2015.

For glow switches containing Pm-147 plated on wire, please provide information about the radiation level and the method of measurement at 1 centimeter from any surface when measured through 7 milligrams per square centimeter of absorber.

We will continue our review upon receipt of this information. If we do not receive a reply from you within 30 calendar days from the date of this letter, we will assume that you do not wish to

pursue your renewal application.

Item 2 of your letter states that Attachment A of your letter is not to be distributed or made available to any third party (e.g., general public). Please be aware that to withhold proprietary information submitted to the NRC from public disclosure, 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). To date, you have not met the requirements for withholding the information in your letter dated January 22, 2016 and its attachments from public disclosure.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please contact me at (301) 415-5608, or by electronic mail at Eric.Reber@nrc.gov.

Sincerely,

/RA/

Eric H. Reber
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal,
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

License No. 16-17316-01E
Docket No. 030-37042
Mail Control No. 589285

pursue your renewal application.

Item 2 of your letter states that Attachment A of your letter is not to be distributed or made available to any third party (e.g., general public). Please be aware that to withhold proprietary information submitted to the NRC from public disclosure, 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). To date, you have not met the requirements for withholding the information in your letter dated January 22, 2016 and its attachments from public disclosure.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, please contact me at (301) 415-5608, or by electronic mail at Eric.Reber@nrc.gov.

Sincerely,

/RA/

Eric H. Reber
Materials Safety Licensing Branch
Division of Material Safety, State, Tribal,
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

License No. 16-17316-01E
Docket No. 030-37042
Mail Control No. 589285

(Pkg.): ML15310A356

ML16039A116

OFC	MSTR/MSLB	MSTR/MSLB	MSTR/MSLB	MSTR/MSLB	MSTR/MSLB
NAME	Eric Reber	DMiller	Richard Struckmeyer	Hipolito Gonzalez	Eric Reber
DATE	2/4/2016	2/4/2016	2/10/2016	2/11/2016	2/11/2016

OFFICIAL RECORD COPY