

SONY

Sony Electronics Inc.

16535 Via Esprillo, San Diego, California 92127 Telephone: (858) 942-4000

October 27, 2017

Division of Industrial and Medical Nuclear Safety
Office of Nuclear Materials Safety and Safeguards
US Nuclear Regulatory Commission
Washington, DC 20555-0001

RE: Application for Renewal of License 04-23948-01E

Dear Sir or Madam,

Please find enclosed 2 copies of the application for renewal of the above license.

Please provide an invoice for the payment of any fees due at this time to:

Charles Colar
Sony Electronics Inc.
2201 E. Carson St.
Carson, CA 90810

Thank you for your assistance with this application.

Sincerely,



Kerwin Brown
Director-Corporate ESH
Sony Electronics Inc.



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

September 1, 2017

Sony Electronics, Inc.
ATTN: Arthur Kaplan
2201 East Carson Street
Carson Logistics Center
Carson, CA 90810

Re: License No. 04-23948-01E

SUBJECT: NOTICE OF LICENSE EXPIRATION

Your U.S. Nuclear Regulatory Commission (NRC) license will expire within the next 2 months. If you wish to continue your licensed program, you should prepare and submit a renewal application on NRC Form 313 (Enclosure 1), following regulations in Title 10 of the *Code of Federal Regulations* (10 CFR) and licensing guidance in NUREG-1556, "Consolidated Guidance About Materials Licenses."

You must submit an application for the renewal of your license at least 30 days before the expiration date on the license.

If you do not wish to renew your license, you must dispose of or transfer all licensed radioactive material in your possession in accordance with 10 CFR 30, 40 and 70. Then complete the enclosed Form NRC-314, "A Certificate of Disposition of Materials" (Enclosure 2) and return it before the expiration date of your license, with a request that your license be terminated. If you have already applied for timely renewal of your materials license, please disregard this letter."

Sincerely,

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

Enclosures:

1. Form NRC 313
2. Form NRC 314

NRC FORM 313
(10-2005)
10CFR30, 32, 33,
34, 35, 36, 39, and 40

U.S. NUCLEAR REGULATORY COMMISSION

APPROVED BY OMB: NO. 3150-0120 EXPIRES: 10/31/2008
Estimated burden per response to comply with this mandatory collection request: 4.4 hours. Submittal of the application is necessary to determine that the applicant is qualified and that adequate procedures exist to protect the public health and safety. Send comments burden estimate to the Records and FOIA/Privacy Services Branch (T-5 F53), U.S. Nuclear Regulatory Commission Washington DC 20555-0001 or by Internet e-mail to infocollects@nrc.gov and to the Desk Officer Office of Information and Regulatory Affairs NEOB-1 0202 (3150-0120), Office of Management and Budget Washington DC 26503. If a means used to impose an information collection does not display a currently valid OMB control number the NRC may not conduct or sponsor, and a person is not required to respond to, the information collection.

APPLICATION FOR MATERIAL LICENSE

INSTRUCTIONS: SEE THE APPROPRIATE LICENSE APPLICATION GUIDE FOR DETAILED INSTRUCTIONS FOR COMPLETING APPLICATION. SEND TWO COPIES OF THE ENTIRE COMPLETED APPLICATION TO THE NRC OFFICE SPECIFIED BELOW.

APPLICATION FOR DISTRIBUTION OF EXEMPT PRODUCTS FILE APPLICATIONS WITH:

DIVISION OF INDUSTRIAL AND MEDICAL NUCLEAR SAFETY
OFFICE OF NUCLEAR MATERIALS SAFETY AND SAFEGUARDS
U.S. NUCLEAR REGULATORY COMMISSION
WASHINGTON, DC 20555-0001

ALL OTHER PERSONS FILE APPLICATIONS AS FOLLOWS:

IF YOU ARE LOCATED IN:

ALABAMA, CONNECTICUT, DELAWARE, DISTRICT OF COLUMBIA, FLORIDA, GEORGIA, KENTUCKY- MAINE MARYLAND MASS-CHUSETTS MISSISSIPPI NEW HAMPSHIRE, NEW JERSEY, NEW YORK, NORTH CAROLINA PENNSYLVANIA PUERTO RICO RHODE ISLAND SOUTH CAROLINA TENNESSEE VERMONT, VIRGINIA, VIRGIN ISLANDS, OR WEST VIRGINIA, SEND APPLICATIONS TO:

LICENSING ASSISTANCE TEAM
DIVISION OF NUCLEAR MATERIALS SAFETY
U.S. NUCLEAR REGULATORY COMMISSION, REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PA 19406-1415

IF YOU ARE LOCATED IN:

ILLINOIS INDIANA, IOWA, MICHIGAN, MINNESOTA, MISSOURI, OHIO, OR WISCONSIN, SEND APPLICATIONS TO:

MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION III
2443 WARRENVILLE ROAD, SUITE 210
LISLE, IL 60532-4352

ALASKA, ARIZONA, ARKANSAS, CALIFORNIA, COLORADO, HAWAII, IDAHO, KANSAS, LOUISIANA-MONTANA NEBRASKA NEVADA NEW MEXICO NORTH DAKOTA OKLAHOMA, OREGON, PACIFIC TRUST TERRITORIES, SOUTH DAKOTA, TEXAS, UTAH, WASHINGTON, OR WYOMING, SEND APPLICATIONS TO:

NUCLEAR MATERIALS LICENSING BRANCH
U.S. NUCLEAR REGULATORY COMMISSION, REGION IV
811 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TX 76011-0005

PERSONS LOCATED IN AGREEMENT STATES SEND APPLICATIONS TO THE U.S. NUCLEAR REGULATORY COMMISSION ONLY IF THEY WISH TO POSSESS AND USE LICENSED MATERIAL IN STATES SUBJECT TO U.S. NUCLEAR REGULATORY COMMISSION JURISDICTIONS.

1. THIS IS AN APPLICATION FOR (Check appropriate item)

- A. NEW LICENSE
- B. AMENDMENT TO LICENSE NUMBER _____
- C. RENEWAL OF LICENSE NUMBER 04-23948-01E

2. NAME AND MAILING ADDRESS OF APPLICANT (Include ZIP code)

Sony Electronics, Inc.
1 Sony Drive
Park Ridge, NJ 07656-8002

3. ADDRESS WHERE LICENSED MATERIAL WILL BE USED OR POSSESSED

SONY Electronics Inc., Carson Logistics Center
2201 East Carson St.
Carson, CA 90810

4. NAME OF PERSON TO BE CONTACTED ABOUT THIS APPLICATION

Arthur L. Kaplan

TELEPHONE NUMBER
440-771-4089

SUBMIT ITEMS 5 THROUGH 11 ON 8-1/2 X 11" PAPER. THE TYPE AND SCOPE OF INFORMATION TO BE PROVIDED IS DESCRIBED IN THE LICENSE APPLICATION GUIDE.

5. RADIOACTIVE MATERIAL
a. Element and mass number; b. chemical and/or physical form; and c. maximum amount which will be possessed at any one time. Please see Attachment 2.

6. PURPOSE(S) FOR WHICH LICENSED MATERIAL WILL BE USED. Please see Attachment 1.

7. INDIVIDUAL(S) RESPONSIBLE FOR RADIATION SAFETY PROGRAM AND THEIR TRAINING EXPERIENCE. N/A. Not required for activities pertaining to this application.

8. TRAINING FOR INDIVIDUALS WORKING IN OR FREQUENTING RESTRICTED AREAS. N/A. Not required for activities pertaining to this application.

9. FACILITIES AND EQUIPMENT. N/A. Not required for activities pertaining to this application.

10. RADIATION SAFETY PROGRAM. N/A. Not required for activities pertaining to this application.

11. WASTE MANAGEMENT. N/A. Not required for activities pertaining to this application.

12. LICENSE FEES (See 10 CFR 170 and Section 170.31)
FEE CATEGORY **3.I** AMOUNT ENCLOSED \$ **9,400.00**

13. CERTIFICATION (Must be completed by applicant) THE APPLICANT UNDERSTANDS THAT ALL STATEMENTS AND REPRESENTATIONS MADE IN THIS APPLICATION ARE BINDING UPON THE APPLICANT.

THE APPLICANT AND ANY OFFICIAL EXECUTING THIS CERTIFICATION ON BEHALF OF THE APPLICANT, NAMED IN ITEM CERTIFY THAT THIS APPLICATION IS PREPARED IN CONFORMITY WITH TITLE 10 CODE OF FEDERAL REGULATIONS, PARTS 30, 32, 33, 34, 35, 36, 39, AND 40, AND THAT ALL INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF THEIR KNOWLEDGE AND BELIEF.

WARNING: 18 U.S.C. SECTION 1001 ACT OF JUNE 25 1948 62 STAT 749 MAKES IT A CRIMINAL OFFENSE TO MAKE A WILLFULLY FALSE STATEMENT OR REPRESENTATION TO ANY DEPARTMENT OR AGENCY OF THE UNITED STATES AS TO ANY MATTER WITHIN ITS JURISDICTION.

CERTIFYING OFFICER - TYPED/PRINTED NAME AND TITLE

Jason Blouard

SIGNATURE

Jason Blouard

DATE

10/23/17

FOR NRC USE ONLY

TYPE OF FEE	FEE LOG	FEE CATEGORY	AMOUNT RECEIVED	CHECK NUMBER	COMMENTS
			\$		
APPROVED BY				DATE	

SONY ELECTRONICS, INC.
1 Sony Drive, Prk Ridge, NJ 07656-8002
10/23/17

**APPLICATION FOR RENEWAL OF EXEMPT DISTRIBUTION
 LICENSE**

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**APPLICATION FOR RENEWAL OF EXEMPT DISTRIBUTION
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ATTACHMENT 1

ITEM 5: RADIOACTIVE MATERIAL

a Element and Mass Number	b Chemical and Physical Form	c Maximum amount to be Possessed at Any One Time (Curies)
Krypton-85	Krypton-85 in the physical form of a gas containing Argon, Hydrogen Bromide, and Krypton-85. The chemical form of Krypton-85 is a noble (i.e. non-reactive) gas. The gas is sealed inside an arc tube. This arc tube is mounted into a projector lamp (referenced as a "LCD projector lamp"), which consists of the arc tube, a reflecting mirror, and a chassis.	Unlimited number of LCD projector lamps, each containing an amount of Krypton-85 not exceeding the exempt quantity of 30 μ Ci.

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ATTACHMENT 2

ITEM 6: PURPOSES FOR WHICH LICENSED MATERIAL WILL BE USED

The Krypton-85 is used in the arc tubes of lamps for LCD projectors. The lamps are referenced as "LCD projector lamps".

These LCD projectors are widely used for conference room presentations, classroom training, and home theater applications, etc.

A. Additive material

LCD projectors containing the projector lamps will be received at the Sony Electronics facility. Each lamp will contain a sealed arc tube, which in turn will contain about 0.27 μCi (about 10 KBq) of Krypton-85.

B. Commercial distribution of products

These LCD projectors will be distributed commercially for mass consumption and used for conference room presentations, classroom training, and home theater applications, etc. And the arc tube with mirror will be distributed for maintenance of the LCD projectors.

Sony Electronics will distribute these projectors and projector lamps from a facility located in the State of California.

1. Type and quantity of byproduct material in each product

There will be less than 0.27 μCi (about 10KBq) of Krypton-85 sealed in each arc tube. Each LCD projector contains one arc tube. The arc tube, which has a quartz body, is then assembled with a reflecting mirror, which is then set to a chassis.

2. Chemical and physical form of the byproduct material

As stated in Attachment 1, the chemical form of the Krypton-85 byproduct material is a noble (i.e. non-reactive) gas. The Krypton-85 is in the physical form of a gas, mixed with argon and (non-radioactive) krypton gases.

3. Solubility of the identified byproduct material

Argon and krypton are both noble gases. Thus the gas mixture is soluble only in concentrated hydrochloric acid, sulfuric acid, or aqua regia (nitric and hydrochloric acids).

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ATTACHMENT 2

Since the Krypton-85 is non-reactive gas, the Krypton-85 could be diluted into the atmosphere at undetectable levels

4. Method of retaining the byproduct material in the product during normal and abnormal conditions of use

The LCD projector contains the following:

- A quartz arc tube, in which the Krypton-85, in the Argon- hydrogen bromide gas mixture, is contained; and
- A reflecting mirror with which the arc tube is assembled.

During normal use, the quartz arc tube and the reflecting mirror are set in the chassis of the LCD projector. During this time, the Krypton-85 byproduct material is contained within a sealed quartz arc tube.

During abnormal use, even if the arc tube failed, a maximum of 0.27 μCi of Krypton-85 would be released into the atmosphere.

5. The maximum external radiation levels at 5 and 25 cm from the surface of the product

We cannot measure the dose rate at the external surface of the metal halide lamp with our survey meters, each of which consists of a commercially available Geiger counter and a compatible meter. Therefore, we have estimated these dose rates as described in Attachment 3, Section I(b)(7) below.

At 5 cm and 25 cm from the lamp surface, the maximum external radiation levels would be about 0.059 $\mu\text{rem} / \text{hr}$ and 0.005 $\mu\text{rem} / \text{hr}$, respectively,

6. Estimated total quantity of byproduct material distributed annually

At about 0.27 μCi of Krypton-85 per lamp, for a maximum annual distribution rate of about 100,000 lamps, the annual distribution of Krypton-85 gas is expected to be about 0.027 Curie.

C Importing of Krypton-85

Pursuant to 10 CFR 110.27 (a)(3), Krypton-85 gas in high-intensity discharge lamps may be imported for use involving activities under "a general or specific NRC or Agreement State license issued by a Commission or a State with which the Commission has entered into an agreement under Section 274b. of the Atomic Energy Act."

D. Exporting of Krypton-85 in Arc Tubes or in Lamps

Pursuant to 10 CFR 110.23 (a)(1), Krypton-85 gas in high-intensity discharge lamps may be exported for use in foreign countries, except for embargoed countries listed in 10 CFR 110.28.

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**APPLICATION FOR RENEWAL OF EXEMPT DISTRIBUTION
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ATTACHMENT 3

MATERIAL PERTAINING DIRECTLY TO SECTIONS IN 10 CFR 32

I. Section 32.14 Certain items containing byproduct material; requirements for license to apply or initially transfer

(a) Requirements specified in 10 CFR 30.33

We believe that we have satisfied the general requirements specified in 10 CFR 30.33.

- (1) Our application is for a purpose authorized by the Atomic Energy Act.
- (2) Our proposed equipment and facilities are adequate to protect health and minimize danger to life or property, because of the very small quantity of Krypton-85 in each projector lamp.
- (3) Our personnel are qualified by training and experience to use the material for the purpose requested in such manner as to protect health and minimize danger to life or property. No special training or experience, related to handling of radioactive materials, is required, because of the very small quantity of Krypton-85 in each projector lamp. Our personnel are qualified by training and experience to handle the lamps in preparation for shipping and in storing them, in order to prevent damage to these lamps.
- (4) We have satisfied the special requirements contained in 10 CFR 32.14.

(b) Information regarding the product pertinent to evaluation of the potential radiation exposure

(1) Chemical and physical form and maximum quantity of Krypton-85 in each product

- o Chemical form: A noble (i.e. non-reactive) gas.
- o Physical form: A gas containing Argon, Hydrogen Bromide, and Krypton-85.
- o Maximum quantity in arc tube: 0.27 μ Ci

(2) Details of construction and design of each product

(i) Arc tube

The arc tube body is a quartz tube. One electrode is inserted into each end. The two ends are then sealed by a heating process. The arc tube is flushed with Argon gas. Next the arc tube is filled with a Argon - Hydrogen bromide gas mixture, which contains up to a maximum of 0.27 μ Ci of Krypton-85.

**APPLICATION FOR RENEWAL OF EXEMPT DISTRIBUTION
LICENSE**

**ATTACHMENT 3
MATERIAL PERTAINING DIRECTLY TO SECTIONS IN 10 CFR 32**

I. Section 32.14 Certain items containing byproduct material; requirements for license to apply or initially transfer

(b) Information regarding the product pertinent to evaluation of the potential radiation exposure

(2) Details of construction and design of each product (continued)

(ii) Arc tube with mirror

The arc tube, which has a quartz body, is assembled with a reflecting mirror.

(iii) LCD projector

Each LCD projector contains one arc tube. The arc tube with mirror is set into the chassis of the LCD projector.

(3) Method of containment or binding of the byproduct material in the product

The Krypton-85 gas mixture is contained inside the quartz arc tube.

(4) Prototype testing to demonstrate byproduct material containment

No specific testing has been done for the prototype of the LCD projector in which the Krypton-85 gas mixture will be contained as described above. However, this LCD projector, without the Krypton-85, has been on the market and used in its present configuration for at least the past 8 years.

The release of the Krypton-85 would occur if the arc tube were shattered. From our past experience, it is a rare case.

In any case, if the arc tube were shattered, a maximum of only about 0.27 μ Ci would be released.

(5) Quality control procedures

The arc tube will be filled with the Argon - Hydrogen Bromide-Krypton-85 gas mixture, which contains specified concentration of Krypton-85. Each finished arc tube containing Krypton-85, and LCD projector containing one of these arc tubes, will be tested in the same manner as LCD projectors with no Krypton-85 that are currently being produced.

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1 Sony Drive, Prk Ridge, NJ 07656-8002

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APPLICATION FOR RENEWAL OF EXEMPT DISTRIBUTION LICENSE

ATTACHMENT 3

MATERIAL PERTAINING DIRECTLY TO SECTIONS IN 10 CFR 32

I. Section 32.14 Certain items containing byproduct material; requirements for license to apply or initially transfer

(b) Information regarding the product pertinent to evaluation of the potential radiation exposure

(5) Quality control procedures (continued)

Each finished lamp is tested to be sure it will light. And electrical and photometric characteristics will be tested. If the arc tube does not light properly, it is scrapped. Each finished LCD projector is also tested, to see if it will work properly. It is also aged for a period of time, to assure that it will function properly when used by a customer. If there is a leak in the arc tube, the arc tube will not light, and it is scrapped.

If the arc tube is broken in shipment, the Krypton-85 gas mixture will leak from the arc tube before it is delivered to the customer. So, the Krypton-85 gas will give no effect to the customer.

(6) Proposed method of labeling

For each LCD projector and maintenance lamp which has the arc tube containing Krypton-85 and the cardboard box covering each shipped LCD projector and lamp will be labeled "Kr85". Also, the cardboard box is marked with the name and address of the distributor (Sony Electronics Inc..

(7) Radiation level and method of measurement

We cannot measure the dose rate at the external surface of the metal halide lamp, from the Krypton-85 in the lamp arc tube, with our survey meters. These are a commercially available Geiger counter and a compatible meter. The minimum detectable level is about 10 $\mu\text{rem} / \text{hr.}$) Therefore, we have estimated these dose rates by calculating the radiation levels at the external surface of the lamp, and at distances of 5 cm and 25 cm from the external surface of the lamp. The calculation was based upon the following assumptions:

- (a) The Krypton-85 is a point source, located at the geometric center of the arc tube.
- (b) The principal component will be gamma radiation. No relatively significant levels of beta radiation will penetrate the arc tube (2.6 mm thick) and reach distances of 5 cm or 25 cm in air from the outer envelope surface.
- (c) Self-absorption of the gamma radiation in the Krypton-85 gas mixture is neglected.

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**APPLICATION FOR RENEWAL OF EXEMPT DISTRIBUTION
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MATERIAL PERTAINING DIRECTLY TO SECTIONS IN 10 CFR 32

I. Section 32.14 Certain items containing byproduct material; requirements for license to apply or initially transfer

(b) Information regarding the product pertinent to evaluation of the potential radiation exposure

- (7) Radiation level and method of measurement (continued)
- (d) Absorption of gamma radiation by the walls of the arc tube and the lamp envelope is neglected.
- (e) The arc tube is a spheroid with an effective radius of about 0.47 cm.
- (f) The smallest distance from the outside surface of the arc tube and the inside surface of the lamp envelope is about 3 cm.
- (g) Bremsstrahlung from beta radiation penetrating the quartz walls of the arc tube is neglected. These walls of quartz are 2.6 mm thick.
- (h) The gamma radiation level at one meter from 1 curie (RHMC) of Krypton-85 is 1.567 mrem / hr per Curie at one meter (4.232×10^{-7} mSv / hr per MBq at one meter), according to Table 6.1.2 on page 168 of the Health Physics and Radiological Health Handbook.
- (i) The maximum activity of Krypton-85 in an arc tube is about 0.27 μ Ci.

Dose rates from the arc tube and from the lamp are as follows:

Item	Dose Rates From Krypton-85	
	(μ rem / hr)	(mrem / yr) *
LCD projector surface	0.35	3.1
5 cm from LCD projector surface	0.059	0.52
25 cm from LCD projector surface	0.0052	0.046

* Based upon exposure for 8760 hours per year.

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MATERIAL PERTAINING DIRECTLY TO SECTIONS IN 10 CFR 32

I. Section 32.14 Certain items containing byproduct material; requirements for license to apply or initially transfer (continued)

(b) Information regarding the product pertinent to evaluation of the potential radiation exposure (continued)

(8) Additional information required by the Commission

Any additional information required by the Commission to determine the safety of the product will be provided when requested.

(c) Quantity of byproduct material must be less than that specified in 10 CFR 30.15.

The quantity of Krypton-85 gas in each arc tube is a maximum of 0.27 μCi , which is less than the quantity specified in 10 CFR 30.15 (a)(8)(iv) for electron tubes (30 μCi).

II. Section 32.15 Same; quality assurance; prohibition of transfer, and labeling.

(a) (1) Maintain quality assurance practices in the manufacture of the product

Quality assurance practices are maintained in the manufacture of the arc tube and the lamp, which will contain the Krypton-85 gas mixture, as described in Section I.(b)(5) above.

(a) (2) Inspection lots

Inspection lots will not be necessary, since each arc tube and each lamp containing Krypton-85 will be subjected to the quality control inspections described in Section I.(b)(5) above.

(a) (3) Visual inspection of each unit, except electron tubes containing byproduct material

Visual inspection of the arc tubes containing the Krypton-85 gas mixture is not required, since it is classified as an electron tube containing byproduct material.

(b) Alternatives to inspection lots

This is not applicable. Please see Section II.(a)(2) above.

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MATERIAL PERTAINING DIRECTLY TO SECTIONS IN 10 CFR 32

II. Section 32.15 Same; quality assurance; prohibition of transfer, and labeling (continued)

(c) Prohibition on transfers on defective or rejected products containing byproduct material

Sony Electronics will not transfer any lamps to anyone for use under 10 CFR 30.15, which does not pass the quality control procedure described in Section I.(a)(5) above.

(d) Labeling of products

Each lamp and lamp jacket will be labeled as described in Section I.(b)(6) above.

III. Section 32.16 Certain items containing byproduct material: Records and reports of transfer

(a) Maintaining records of transfer and reporting transfers

Sony Electronics will maintain records of transfer of metal halide lamps containing Krypton-85 gas mixture. In addition to the information required by Section III.(b) below, these records will include the date and destination of each transfer. Also, Sony Electronics will report such transfers to the Director of the Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission, Washington, D.C. A copy will be sent to the Director, U.S. Nuclear Regulatory Commission, 801 Warrenville Road, Lisle, Illinois 60532-4351 (or any other address that may be appropriate for the Region III office in the future).

(b) Information required for the report

Sony Electronics's report of transfers of metal halide lamps containing Krypton-85 gas mixture will contain the following information:

- (1) A description of the metal halide lamp.
- (2) The total quantity of Krypton-85 in each lamp (0.05 μ Ci, 1.0 μ Ci, or 1.5 μ Ci).
- (3) The number of lamps transferred during the reporting period.

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**APPLICATION FOR RENEWAL OF EXEMPT DISTRIBUTION
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MATERIAL PERTAINING DIRECTLY TO SECTIONS IN 10 CFR 32

III. Section 32.16 Certain items containing byproduct material: Records and reports of transfer (continued)

(c) Filing the report

Sony Electronics will file the report required by III.(a) and III.(b) above within 30 days after:

- (1) Five years after filing the preceding report; or
- (2) Filing an application for renewal under 10 CFR 30.37; or
- (3) Notifying the Commission under 10 CFR 30.34(f) of Sony Electronics's decision to permanently discontinue activities described in this Application.

(d) Period covered by the report

The time period covered by the report required by III.(a) and III.(b) will be between the time at which the preceding report was filed, and the time of one of the occurrences specified in Sections III.(c)(1), (2), or (3) above [Sections (1), (2), or (3) in 10 CFR 32.16(c)].

(e) Maintenance of records

Sony Electronics will maintain records of transfers of metal halide lamps containing Krypton-85 gas mixture which are described in Sections III.(b) above, for a period of at least one year after a report related to such transfers has been sent to the Commission.