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WATCH COMPANY

April 30, 2018

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

Re: Multi Time Machine, Inc.
Exempt Distribution License# 04-23946-01E
Control Number 608384

Dear Mr. Struckmeyer,

In response to your letter dated on April 17, 2018 for additional information please see below our response:

1. Please see attached requested last two pages of the letter (Page Title: Rad Case Design and Page Title: Predator Case Design)
2. Current models that are listed on our license are not affected by these changes.
3. Construction and Design: Please see attached Designs submitted for question number 1 above and Page 2 from our Applicant/Manufacturer Information.
4. Method of Containment or Binding: GTLS tubes are attached to the DIAL by putting them into special premade slots with an adhesive that holds the GTLS tubes in place from below to the dial. GTLS tubes are attached to the HANDS with a non hardening adhesive from below using 3M tape (See Page 2 from our Applicant/Manufacturer Information).
5. Labeling or Marking: Please see Page 17 of the proposed method of labeling each unit with the logo MTM printed on the dial.
6. To prevent the transfer of defective products to end users, all products are examined prior to transferring. Should we discover that a product is defective, it will be sent back to the manufacturer to be repaired or reworked and retested to meet the applicable criteria. If product cannot be corrected, it will be disposed of as required.

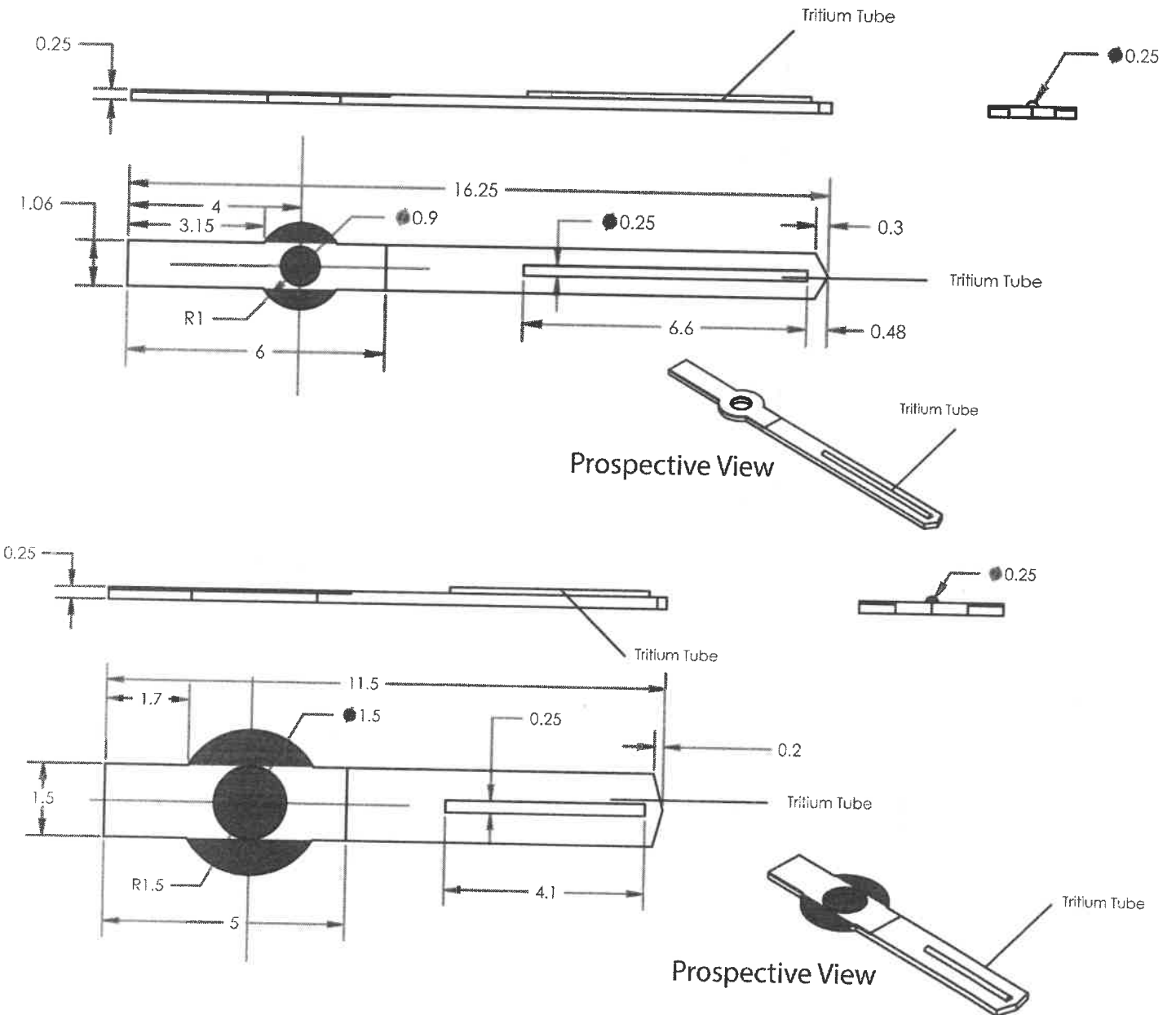
If you have any questions, please contact me at 213-741-0808.

Thank you,


Yoav Avicasis

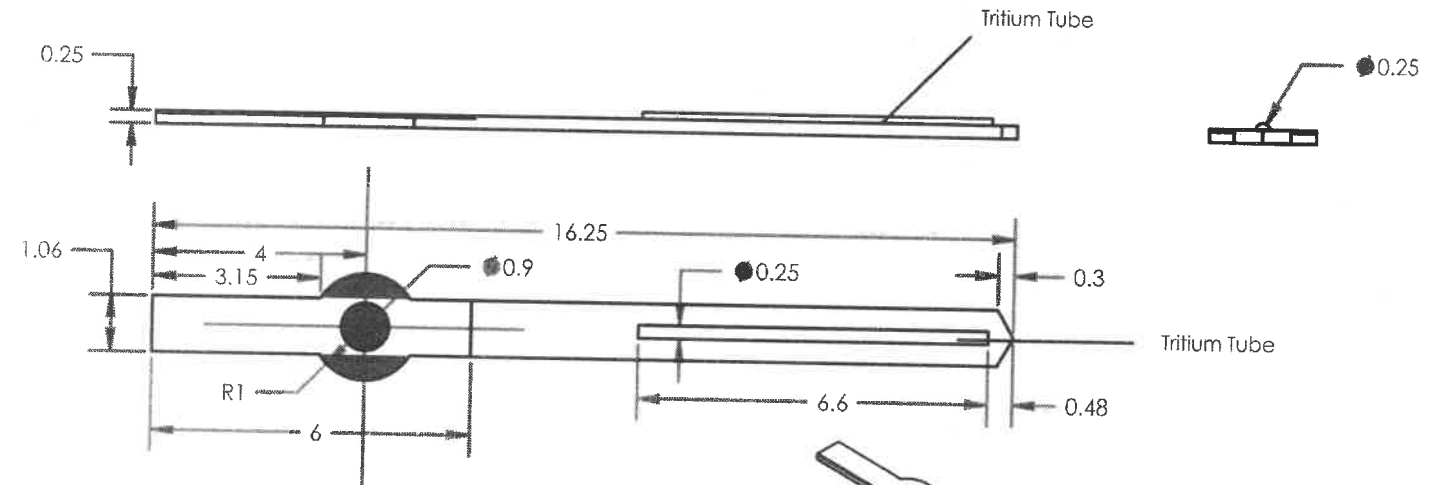


HOUR AND MINUTE HANDS FOR PREDATOR

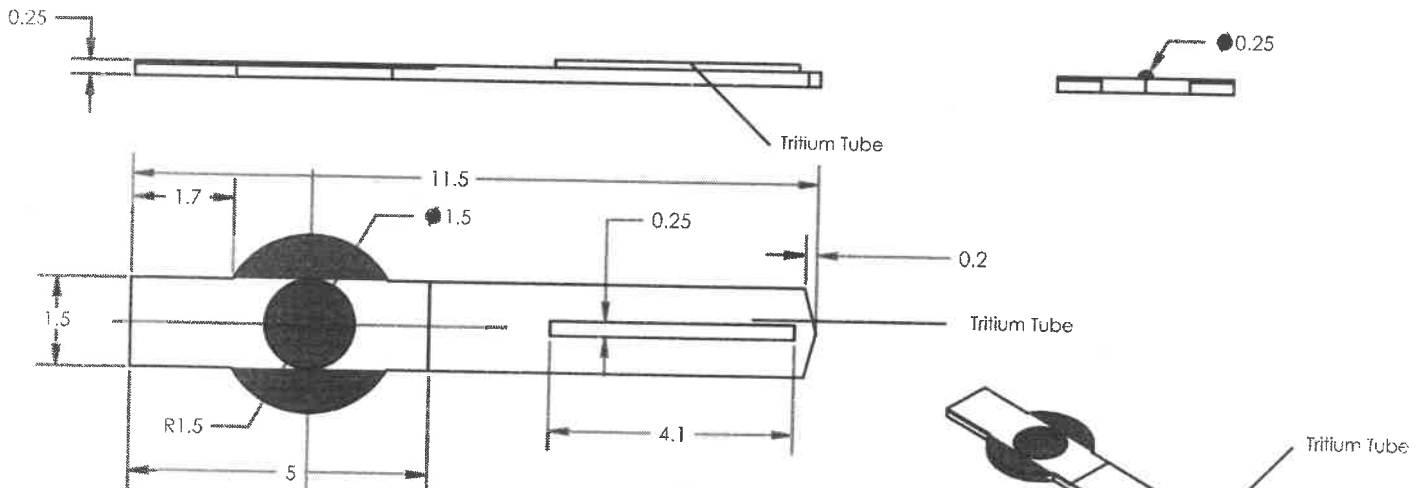




HOUR AND MINUTE HANDS FOR RAD



Prospective View



Prospective View

The sealed source is H3 Tritium GTLS tubes on watch dials and hands.

The Principal use code is R.

The Licence is intended to be used by persons exempt from licensing requirements.

The maximum quantity of watches held at any one time will be 5,882 watches, minimum 10,000 mCi - maximum 100,000 mCi.

The GTLS Tubes contain H3. Tritium. The Max. amount will not exceed 25 mCi of Tritium per watch.

Here are the intended Gaseous Tritium levels for the GTLS tubes utilized in the watches.

Part # 1. Hour Hand 0.63 x 4.1 mm long = 0.0740 GBq

Part # 2. Minute Hand 0.63 x 6.6 mm long = 0.1110 GBq

Part # 3. Index 0.95 x 2.4 mm long = 0.0426 GBq

Total number of activity for watch hands is $0.0740 \text{ GBq} + 0.1110 \text{ GBq} = 0.185 \text{ GBq}$.

Total number of activity for dial is $0.0426 \text{ GBq} \times 10 \text{ units} = 0.426$

Total Tritium activity level for one watch is $0.185 \text{ GBq} + 0.426 \text{ GBq} = 0.611 \text{ GBq}$

Ref. NUREG-1556 Vol 8

CONDITIONS OF USE.

The watches will be worn by Law Enforcement, Military and members of the public. The watches will be sold all over the USA. The watch will be worn on the wrist for long periods of time.

Transportation of the watches are covered on page 13

The working life of the GTLS tubes we expect to be approx. 25 years. The watches will be using Lithium Ion batteries with a life span of 10 years.

The GTLS tubes at that 10 year period would have lost half of its original light output.

REF. NUREG -1556 Vol 8

Construction of the watch.

The watch cases will be made of either 316L Stainless Surgical Steel or Titanium. The Crystals will be Sapphire crystals.

The GTLS tubes are attached to the dial by putting them into special premade slots with an adhesive that holds the GTLS tubes in place from below to the dial face.

The GTLS tubes are attached to the hands with a non hardening adhesive from below using 3M tape.

Access to the GTLS tubes will require a tool usually only found in watch repair stores to unscrew the back case cover. See page 12 This tool ensures a very tight case closure. The owners manual will recommend the watch be sent back to MTM to avoid voiding the warranty. Currently our watches are only sold to the end user and not in retail stores. So there is an incentive to send the watch to us for any service requirements. The watches do incorporate screw down crowns.

Information regarding tube design and elevation technical drawings for the watches can be viewed on pages 4 thru 18.

