

Nov. 1 HQ
3I + 3P
020361
LSK

NOTE TO: License Fee Management Branch, ARM
FROM: Medical, Academic, and Commercial Use Safety Branch, NMSS
SUBJECT: VOIDED APPLICATION

Control Number 020361
Applicant CANON USA, INC.
Date Voided 7/20/88
Reason for Void Application withdrawn
per letter dated 7/12/88
after review (ref. to above)

Signature
J. Bruce Carrico

Attachment:
Application

OK LFMB
no refund due

8912060087 880720
NMSS LIC30 PDR

111
ML00
Send Copy to RI

R1201020

LICENSING MANAGEMENT SYSTEM

DATE: 11/17/87
PAGE: 1

LMS WORKSHEET

IO
11/24/87

Control voided
Per Ltr dtd 7/12/88
JBC
7/20/88

BOOKET NO: 03030298

LICENSE NO: -----

MAIL CONTROL NO: 020361

RECEIPT DATE: 871117

ACTION TYPE: 2

FED GOVT: N

INST CODE: 23700

LICENSING REGION: 0

STATUS: 3

PRIORITY FLAG: N

NAME: CANON U. S. A., INC.

DEPT/BUREAU: -----

BUILDING: -----

STREET: ONE CANON PLAZA

CITY: LAKE SUCCESS STATE: NY ZIP: 11042

CONTACT PERSON: ----- CONTACT PHONE: -----

PROGRAM CODES: -----

LICENSE ISSUE DATE: _____ EXPIRATION DATE: _____
YYNMD D YYYYYMDD

RSO: -----

STATES WHERE USE AUTHORIZED: -
0 - ALL LISTED STATES
1 - SAME AS STATE IN ADDRESS
2 - ALL STATES
3 - NON-AGREEMENT STATES

INDIVIDUAL STATES: -----

RIS CODES: -----

APPROVED FOR:
REDISTRIBUTION: - INCINERATION: -
STORAGE ONLY: - BURIAL: -
TEMP JOB SITES: -

EXEMPTIONS

POSSESSION LIMIT INFORMATION

MATERIAL TYPE: -----
SS/MFG MODEL NO: -----

FORM CODE: ---

ISOTOPE QUANTITY: -----
ITEM QUANTITY: -----
TOTAL QUANTITY: -----
OTHER: -----

UNIT: ---
UNIT: ---
UNIT: ---
SOURCES: ---

MATERIAL TYPE: -----
SS/MFG MODEL NO: -----

FORM CODE: ---

ISOTOPE QUANTITY: -----
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OTHER: -----

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UNIT: ---
UNIT: ---
SOURCES: ---

MATERIAL TYPE: -----
SS/MFG MODEL NO: -----

FORM CODE: ---

ISOTOPE QUANTITY: -----
ITEM QUANTITY: -----
TOTAL QUANTITY: -----

UNIT: ---
UNIT: ---
UNIT: ---

INDIVIDUAL USERS

NAME

AUTHORIZATION

ADDRESS WHERE MATERIAL IS USED OR POSSESSED

BUILDING: -----
ROOM: -----
STREET: -----
CITY: -----
STATE: ----- ZIP -----

BUILDING: -----
ROOM: -----
STREET: -----
CITY: -----
STATE: ----- ZIP -----

BUILDING: -----
ROOM: -----
STREET: -----
CITY: -----
STATE: ----- ZIP -----

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ROOM: -----
STREET: -----
CITY: -----
STATE: ----- ZIP -----

BUILDING: -----
ROOM: -----
STREET: -----
CITY: -----
STATE: ----- ZIP -----

OTHER: --

SOURCES: ----

Canon

CANON U.S.A., INC.
ONE JERICHO PLAZA, JERICHO, N.Y. 11753-1679
TELEPHONE: (516) 933-6300



Canon
EOS
More than autofocus.
More than ever.

July 12, 1988

United States Nuclear Regulatory Commission
Washington, DC 20555

ATTN: J. BRUCE CARRICO
MEDICAL, ACADEMIC AND COMMERCIAL
USE SAFETY BRANCH
DIVISION OF INDUSTRIAL AND
MEDICAL NUCLEAR SAFETY, NMSS

Dear Mr. Carrico:

RE: YOUR LETTER DATED JUNE 24, 1988 - MAIL CONTROL NO. 020361

First, we must apologize for not contacting you promptly after submission for application and licensing dated November 13, 1987.

We very carefully studied the entire situation and it was concluded and we decided not to use the glow lamps containing radioactive material. Therefore, we have not applied for licenses in other states, nor was any decision required on these waste disposal situations.

We respectfully withdraw the application submitted dated November 13, 1987. Thank you for your assistance and cooperation in our submitting this licensing application.

We apologize again for any inconvenience we may have caused you. If you require further information and/or questions, please write or call me at the Jericho address listed below. I am the main person or individual to contact at Canon USA. I am enclosing my new business card for your records.

Canon USA, Inc.
Quality Assurance Department
Service Division
One Jericho Plaza
Jericho, NY 11753-1673
(516) 933-6333 Ext. 6327

M. Tamada
Quality Assurance Assistant Manager

MT:dp

Canon

MASANOBU TAMADA
Assistant Manager
Quality Assurance Department

CANON U.S.A., INC.
Service Division
One Jericho Plaza
Jericho, NY 11753-1679

Tel. 516/933-6333
Ext. 6327
Fax 516/933-1282

RECEIVED
MAY 17 1988
MAY 17 1988

JUN 24 1988

CANNON USA

- 1 -

Cannon U.S.A., Inc.
ATTN: Masanobu Tamada
Quality Assurance Specialist
One Cannon Plaza
Lake Success, New York 11042

Gentlemen:

This refers to your application dated November 13, 1987, for a license to distribute, pursuant to Section 32.14 of 10 CFR Part 32, glow lamps containing radioactive material to persons exempt from licensing pursuant to Section 30.15 of 10 CFR Part 30. We find that the following additional information is needed in support of your license request:

1. We note that your company is headquartered in Lake Success, NY; that Mr. Tamada (who is named as the contact person for the license) is located Jericho NY; and that your only warehousing/distribution center under NRC jurisdiction is located in New Jersey. Please clarify where records concerning your distribution/possession activities are to be maintained for NRC inspection. Also confirm that despite the different address location for Mr. Tamada, information mailed by NRC will be able to reach him without extensive problems.
2. Appendix A to your application identifies various warehouse locations and provides certain additional information concerning these locations. We note that the names you provided for these warehouses would appear to indicate that they are not necessarily owned by or under Cannon U.S.A.'s control. Please clarify this situation and completely describe Cannon's importation, warehousing, and distribution procedures.

As indicated above, only the warehouse located in New Jersey would be under NRC jurisdiction. In order for Cannon U.S.A. to possess and warehouse the devices prior to distribution at the other locations you will need to obtain a license from the appropriate authorities in each state. What is the status of your license applications in these states?

3. In item B on page 3 of Appendix B of the application, you state, "The maximum amount will be possessed at any time is 10,000." Does this mean 10,000 microcuries or units (tubes)? Also, is this only at the New Jersey location or total in the United States? You should only specify the maximum amount (in microcuries) to be possessed at the New Jersey facility at any one time.

4. On page 4 of Appendix B, in items F and G, you discuss procedures for quality control testing of the glow lamps by both Toshiba and Cannon. In both of these items you indicate that, either now or in the future, only a random sample will be subjected to certain tests. You should note that paragraph 32.15(a)(2) requires that the sample size and testing must be in accordance with the tables and instructions specified in Section 32.110 of 10 CFR Part 32, unless otherwise authorized pursuant to paragraph 32.15(b). It is not apparent from the information you provided that your quality control testing procedures are in accordance with these requirements. Please clarify and/or describe procedures to show you meet the requirements.
5. The information you provided concerning labeling indicates that the contact sensor unit rather than the glow lamp itself will be labeled. The exemption provided in paragraph 30.15(a)(8) is for electron tubes (or glow lamps). Paragraph 32.15(d) specifies that each unit (e.g., the glow lamp) must be labeled. While we would consider alternative labeling provisions, such alternatives must be justified and shown to be equivalent to labeling the tube itself (e.g., separation of the tube from the unit is highly unlikely to occur under reasonable circumstances). You should also provide information to show that the label can be expected to remain durable and legible over the expected useful life of the product and provide a sketch or drawing to show the location of the label on the unit.
6. We note that the diagrams attached to your application are marked "confidential." Please note that license applications are available for review by the general public in the NRC Public Document Rooms. You should do not submit proprietary or confidential information unless it is absolutely necessary. If submittal of such information is necessary, you must follow the procedure specified in Section 2.790 of 10 CFR Part 2. Failure to follow this procedure may result in disclosure of the proprietary information to the public. Please clarify.
7. Concerning disposal of the glow tubes by Cannon U.S.A., you simply state on page 3 of Appendix B, "All waste disposal will meet or exceed NRC and applicable state regulations" and on page 4 of Appendix C, "Disposal merchandise may be sent to a special agent at the company's discretion." To the extent that Cannon U.S.A. possesses the glow tubes, disposal must be carried out in accordance with the requirements specified in 10 CFR Part 20. In general there are two options; transfer to a licensed radioactive waste disposal firm or return to the manufacturer for disposal. Please specify how you intend to dispose of waste materials. If you intend to transfer the materials to a licensed disposal firm, you must identify the name and license number of the firm.