TEL. (416) 475-9420 TELEX: 06-966849 Cable: Morwein-Markham FAX: (416) 475-2535



# MARATHON MANAGEMENT COMPANY (A SUBSIDIARY OF MARATHON WATCH COMPANY LTD.) 67A STEELCASE RD. WEST, MARKHAM, ONT. L3R 2M4

August 23, 1989

Nuclear Regulatory Commission 1 White Flint North 11555 Rockville Pike Rockville, MD 20852

Attention: Floyd Deschamps (301) 492-0503

Dear Mr. Deschamps,

Enclosed please find an amendment to our license application; you already have our application for license for compasses and all applicable paperwork. The license is urgently needed to distribute watches to the Department of Defense and the General Services Administration . We are now bidding on two solicitations for watches.

The following is a short description of manufacturing and transportation for the watches:

1) Watches will be made at:

Gallet & Co. 2301 La Chaux-de-Fonds

Switzer!and

643 Dunkle Street

2) Then go to:

Tritium Vuilleumier La Chaux-de-Fonds

Where the tritium will be applied and watches will be examined by DCAS in Switzerland.

examined by DCAS in Switzerland.

3) Then shipment will go to: M.I.S.C. Inc.

Thomas M. Kerrigan Harrisburg, PA 17105 FAX: (717) 232-4722

- To be military packed and checked by Government packaging inspectors. (Description of premises of M.I.S.C. enclosed).
- 4) Then shipment goes to: Government Destination.

We hope this information is to your satisfaction.

Contact: Anne C Kerrigan

Yours truly, MARATHON WATCH COMPANY LTD.

Leon Wein

Encl.

9002020280 900130 PDR FDIA BICKMAN90-11 PDR P.S. Additional information on the compass will be sent to you very shortly.

Alb

TEL: (717) 232-4719

P.O. BOX 3823 643 DUNKLE STREET HARRISBURG, PA 17105 (717) 232-4719

> P.O. Box 3823 Harrisburg, Pa. 17105

Number Years in Business Going into 5th year Incorporated under the PA. STATE LAWS

Security System:

Building wired with alarm system, no sprinkler system. Facility enclosed with six foot chain link fence. On the grounds security tenant. Company employee lives in apt. attached to grounds.

#### Brief History:

Prime Contractor with: Navy Ships Parts Control Center-Mechanicsburg, Pa, \$500.000 Yearly in contracts. Sub-Contractor with many other Gov't installation including Airforce and Army.

Sub-Contractor - on-going concerns

1. Gammon Technical Products

Manasquan, N.J. 2. Technical Products & Precision Engineering Co. Hatfield, Pa. 19440

3. Amplex Corp Bloomfiedl, CT.

4, DBR Industries, Inc. Newtown, Pa.

5. JAN Packaging Co. Dover, N.J.

6. J.A. MOODY Co. Malvern, Pa.

7. A.C.T. INC, Elizabethtown, Pa.

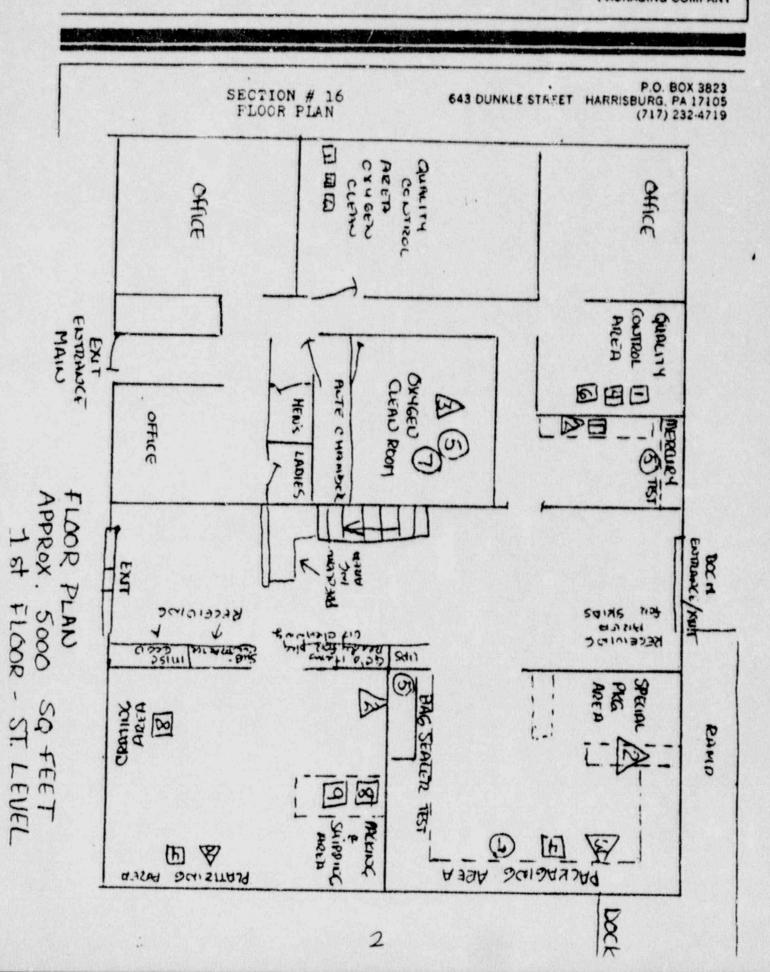
8. Fluid Power Inc. York, Pa,

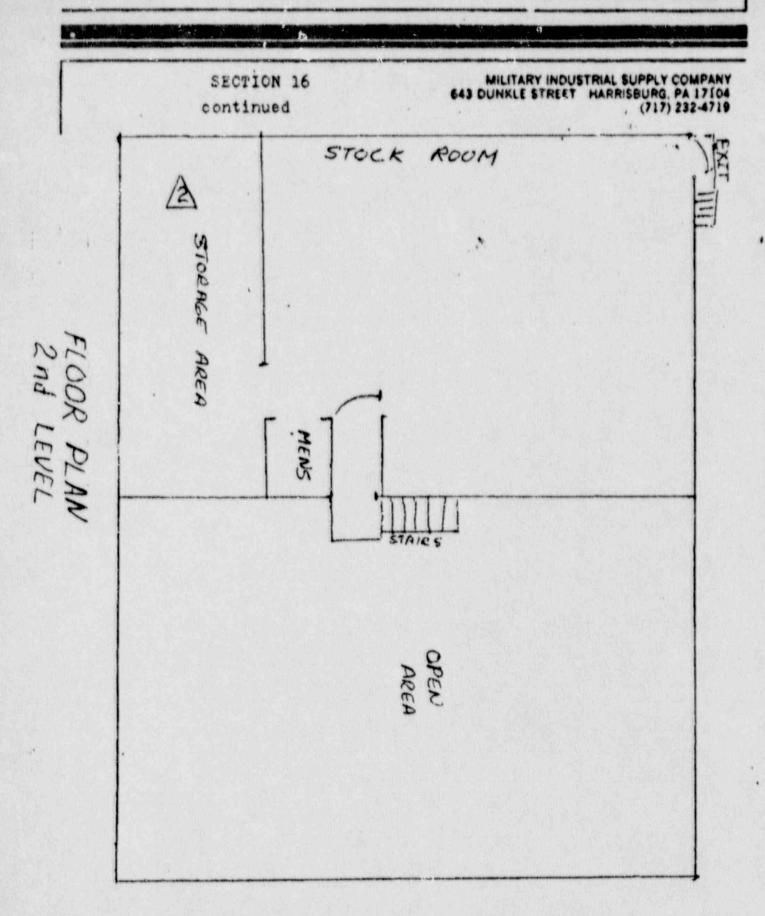
9. Many additional small local gov't prime contractors.

In addition to Mil-Spec Packagin and Cratin, MISC INC has a NAVSEA SYSTEMS approved Clean Room for Oxygen Use application.

Anne C. Kerrigan

President





P.O. BOX 3823 643 DUNKLE STREET HARRISHURG, PA. 17165

## QUALITY. EVELUATION SURVEY

Company Name M.I.S.C., INC.	Principal Product or Services MILITARY PACKAGING:
Address P.O. BOX 3823	OXYGEN CLEANING TO MIL-SPEC'S.
643 DUNKLE ST.	
HARRISBURG, PA 17104	
Phone No. 717 232 4719 FAX 717 232 4722	
YES Small Business Concern YES Woman-Ow	med and operated Concern
NO Small Business Concern Owned and Contro	lled by Minority or Disadvantaged Individual
Company Management Personnel:	broadtantaged individual
Name ANNE C. KERRIGAN Pos.	Attan Diprovinces
THOMAS M. KERRIGAN	PLANT MANAGER
Participants in Survey: Name ANNE C. KERRIGAN PRESIDENT	Organization/Dept. Signature
THOMAS M. KERRIGAN PLANT MANAGER	ALL The Market
<ol> <li>Attach a facilities list, including inspect Include a list of special processes perform cesses have been pertified, listing the app cy. Answer all questions that pertain to you</li> </ol>	licable specification and certifying agen- ur company's service.
2. Total No. of Employees 7 No. of Qua.	lity Control employees 2
No. of employees in Mfg. 4 No. of Adm.	in. employees 2
Name T.M. KERRIGAN Title PLNT MN	Inspection?
Reporting to A.C. KERRIGAN Title PRESIDE	NI.
. Do you have a Quality Control Manual or other	r type of written procedure describing

18	. Do you conduct a final inspection? XX Yes No If st. describe your system. ADOPTED SYSTEM FROM, BUT NOT EXCLUDING THE USE OF, MIL-1-45208A.
	Who performs final inspection? THOMAS M. KERRIGAN, PLANT MANAGER.
19	Are parts identified to indicate final inspection? XX Yes No If so by what means? CONTROLLED STAMP / INITIALS OF QC.
20.	Are records of final acceptance maintained?xx YesNo For how long? FIVE YEAR
21 .	Are inspection gages, measuring devices, and test equipment periodically inspected arecalibrated at established intervals? xx Yes No
22.	Are records of calibration kept on file? xx Yes No
	Is inspection equipment labeled according to calibration date? xx Yes No
24.	Are employee-owned gages, etc. used for inspection? Yes xx No
25.	Is the calibration of your gages and inspection or test equipment traceable to the National Bureau of Standards? xx Yes No
26.	When were your master gage blocks or test equipment last certified? 7/88.
	How do you identify and segregate non-conforming material? ITEMS PHYSICALLY ID'd, SEPARATE "REJECTION" STATUS AREA w/ WARNING/STATUSLABELS; REMOVAL BY AUTHORIZATION ONLY.
28.	Do you have a corrective action program covering both purchased and manufactured non-conforming materials and parts?xx_YesNo
29.	Do you have a drawing and drawing revision control system? xx Yes No If yes, describe the system and responsible personnel UNDER T.M. KERRIGAN: DWG & DWG REV. CGATTRED AGAINST CONTRACTUAL REQUIREMENTS/CUSTOMER SPECS. MILITARY STANDARDS UPDATED QUARTERLY BY PRIVATE INDUSTRY (NATIONAL STANDARS ASSOC.)
30.	Do you have facilities to do specialized packaging? CLEAN ROOM -FED-STD 209; SET-UP FOR PROCESSING UNDER MIL-STD-1330 & MIL-C-52211.
1.	Would you permit a survey of your plant by an authorized representative of MISC INC?
2.	Do you have metric manufacturing and inspection capabilites? xx Yes No
3.	Do you have an environmentally controlled area for inspection, assembly, cleaning, testing, etc., if required? xx Yes No If yes, describe.INSPECTION ROOM-AIR COND. STD CONDITIONS. CLEAN ROOM-CLASS 100,000 IAW FED-STD-209.
	have you had with the type of service to be supplied? 4.5 YEARS MIL

Application for a License to the Nuclear Regulatory Commission for the Transfer of Watches Containing Tritium by Marathon Watch Company Ltd.

#### PART 32:answers to sections pertinent to application

32.22

(6)

- (a) (1) Marathon Watch Company Ltd. is applying for a license to transfer watches containing tritium.
  - (2) (i) These products are described as:
    - 1) Wrist Watch, Navigational, model # 211

2) Wrist Watch, General Purpose

i) Mechanical wristwatch model # 348

ii)Quartz wristwatch, model # 350
to be used for U.S. Department of Defense and General
Service administration. Watches are designed as per
U.S. Department of Defence specifications, which we
have already sent you.

(ii) The type of byproduct material in each unit is phosphor with hydrogen isotope tritium, in gaseous form. Tritium ISO 8 is used. There are 3 millicuries per each watch used. One gram equals 400 millicuries, and with one gram we can set tritium on 150 watches.

(iii) Chemical form of the byproduct material is tritium. The useful life of product is 5-10 years; no changes in chemical or physical form will occur during the useful life of the product. Physical form is as in (ii).

(iv) The tritium will be encased in glass vials, therefore there will be no solubility in water and bodily fluids.

(v) Please note that we have already sent copies of specifications outlining construction of the watches.

(vi) Maximum external radiation levels at 5 and 25 cm are both measured as 0 (none) as measured by geiger counter.

(vii) The degree of access to human beings to the product during normal handling and use is that the watch will be worn on the wrist.

(viii) The total quantity of byproduct material expected to be distributed in the product annually is approximately 150,000 millicuries. This is an estimate based on 50,000 watches; depending on contracts obtained from government sources only. (ix) The expected useful life of the product (watch) is 5-10 years.

(x) The proposed method of marking each unit with appropriate identification is outlined in the watch specifications. Markings will be engraved on the back of each watch.

(xi) Procedures for prototype testing of the product to demonstrate the effectiveness of the containment, sheilding, and other safety features under both normal and severe conditions of handling, storage, use, and disposal of the product will be under Radiological quality assurance

(xii, xiii, and xiv) Results of prototype testing, estimated radiation doses and dose commitments relevant to safety criteria in 32.23 and a determination that the probabilities with respect to the doses referred to in 32.23(d) meet that criteria are met by Marathon by adherence to:

1) Wrist watch, Navigation MIL SA-ALC/MMI PD-496 (Revision B, 26FEB85)

2) General Purpose wrist watch MIL-W-46374E (31MAY89)

These military specifications outline procedures for Conformance Inspection, Radiological, re MIL-STD-105. The manufacturer does testing for vibration and immersion. The watch and the vials will resist to immersion up to 3 ATUS, 90 feet. The watch and the vials will resist to 90 minutes vibration of harmonic motion having an amplitude of 0.03 inches (0.06 inch maximum total excursion). DCAS of Frankfurt, West Germany will be monitoring the production as well as quality and safety procedures. (see appendix A)

(xv) Quality control procedures to be followed in the fabrication of production lots and quality control standards will be set by MIL-W-46374E and MILSA-ALC/MMIPD-496.

(xvi) Any additional information, including experimental studies and tests, required by the Commission will be given as required. 32.23

(a) The watches are designed and manufactured in accordance to specifications that contain MIL-STD-105 and therefore will not exceed the dose to the appropriate organ as specified in Column I of the table in 32.24 of this part.

(b) In normal handling and storage of the watch, the completed product will be further military packaged by personnel at a military packing house. The dose will not exceed as per table of organ doses in collumn II of the table in 32.24.

(c) It is unlikely that there will be a signifigant reduction in the effectiveness of the containment, sheilding, or other safety features of the product from wear and abuse likely to occur in normal handling and use of the product during its useful life. Watches will be tested and manufactured as specified under MIL-W-46374E and MILSA-ALC/MMIPD-496.

(d) In use and disposal of a single unit, or in handling

In use and disposal of a single unit, or in handling and storage of the quantities of exempt units likely to accumulate in one location during marketing, distribution, installation, and servicing of the product, the probability is low that the containment, sheilding, or other safety features of the product would fail under such circumstances that a person would receive an external radiation dose or committment in excess of the dose to the appropriate organ as specified in Column III of the table in 32.24, and the probability is negligible that a person would receive an external radiation dose commitment in excess of the dose to the appropriate organ as specified in Column IV, of the table in 32.24.

\*please note that we will elaborate on this point by an additional letter shortly.

Append x 7



#### DEPARTMENT OF THE ARMY UNITED STATES ARMY CONTRACTING COMMAND, SUROPS UBAREUR CONTRACTING CENTER ESCHERBHEIMER LANDSTRASSE 163 6000 FRANKFURT/MAIN 1



United States Army Contracting Center, Europe

### Address from the USA:

Address from Europe: US ARMY CONTRACTING COMMAND EUROPE US ARMY CONTRACTING COMMAND EUROP

USAREUR CONTRACTING CENTER (USAREURCC) ATTN: AEUCC-C-CUF (word) THORNALT BREUBE, QUE

BOX 49

APO N.Y. 09710-5345

WEST GERMANY ATTN: (Name)

6000 FRANKFURT/MAIN

Telephone Numbers: civilian

( Germany ) 69 558298

69 1517255 69 1515217 military

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ESCHERSHEIMER LANDSTRASSE 163

3207255 3205217

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(mil) 320 7634