

Marathon Watch Company, Ltd.
ATTN: Mr. Leon Wein
67A Steelcase Road, West
Markham, Ontario L3R 2M4
Canada

AUG 16 1989

Dear Mr. Wein:

This letter is in reference to your letter of July 11, 1989 requesting registration of a lensatic compass.

To continue with this review, the following information will be needed:

1. Per the requirements of Section 32.23(d) of 10 CFR Part 32, Marathon Watch must demonstrate that the compasses is designed so that in handling and storage of the quantities of compasses likely to accumulate in one location during marketing, distribution, installation and servicing the probability is low that the containment of the gas would fail under such circumstances that a person would receive a external radiation dose in excess of the dose to appropriate organ as specified in Column II of the table in Section 32.24 and the probability is negligible that a person would receive an external radiation dose in excess of the dose to the appropriate organ as specified in Column IV of the Table in Section 32.24. Marathon Watch could create a scenario whereby an accident may occur and a number of compasses would be destroyed in the same area and calculate the radiation dose to an individual as means of meeting this requirement (see enclosed Regulatory Guide).
2. Please submit the model number of the compass.
3. Per the testing requirements of ANS N542, the MIC-C-10436L testing does not meet minimum test requirements in the areas of vibration and immersion. Please submit additional test data to demonstrate that the device meets the test criteria of ANS N542 or provide a discussion that the test are not needed.

We look forward to receiving the requested information. If you have any questions, please feel to call the undersigned at (301) 492-0503 or Mr. Steven Baggett at (301) 492-0542.

Sincerely,

/s/
Floyd DesChamps
Commercial Section
Medical, Academic, and Commercial
Use Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS

Enclosure: As stated

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~~SLClem~~
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