

From: Abhishek Singh <asingh@howard.com>
Sent: Tuesday, August 10, 2021 2:01 PM
To: Hammond, Michelle <Michelle.Hammond@nrc.gov>
Cc: Jason Cook <jcook@howard.com>; Xu, Shirley <Shirley.Xu@nrc.gov>
Subject: [External_Sender] RE: RE: RAI #2 - Additional RAI to letter dated 7/27/21

Hello Ms. Hammond,

I received your voicemail. Below are the responses to the questions from your email yesterday:

- 1) How many of the bulbs you have that do not have the required labelling ??

We have approximately 71,000 lamps that do not have the NRC labeling.

- 2) Reasons why you cannot label the existing inventory of bulbs itself.

Howard does not manufacture these lamps; we are only a distributor. Therefore, we do not have the technical capability to etch the NRC language on the lamp units. Any effort by Howard to etch this text on the lamps post-production may result in lamp breakage and related safety issues, and may also compromise the quality and longevity of the lamps. In addition to the technical feasibility, breakage, safety and product quality issues, such an effort would also be cost-prohibitive.

However, Howard can place a label stating, "Arc tube fill gas contains Kr-85. Electrodes contain Thorium," on the immediate protective, corrugated paper sleeve or box that holds each unit (as shown in our previous submissions), and mark the outermost shipping containers with the same information. Thus the required information would be communicated to the end-user in a clear and legible fashion on the packaging for each individual unit. We are asking for authorization to distribute our existing product in this manner.

In your voicemail, you mentioned about a quick chat – please let me know if you would still like me to call you back.

Thanks,
Abhishek



From: Hammond, Michelle <Michelle.Hammond@nrc.gov>
Sent: Monday, August 9, 2021 9:59 AM
To: Abhishek Singh <asingh@howard.com>
Cc: Jason Cook <jcook@howard.com>; Xu, Shirley <Shirley.Xu@nrc.gov>
Subject: RE: RE: RAI #2 - Additional RAI to letter dated 7/27/21

****CAUTION****

This email originated from outside of Howard Industries. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Morning,

Your response regarding the labelling of the existing units will require a temporary exemption to the requirements. Our Office of General Counsel will review the request.

Can you provide the following information regarding your response:

- 1) How many of the bulbs you have that do not have the required labelling ??
- 2) Reasons why you cannot label the existing inventory of bulbs itself.

Thank You.

Best Regards,

*Michelle M. Hammond, M.Sc.
Health Physicist
NMSS/MSST/MSTB
301-415-3257*



From: Abhishek Singh <asingh@howard.com>
Sent: Friday, August 06, 2021 4:52 PM
To: Hammond, Michelle <Michelle.Hammond@nrc.gov>
Cc: Jason Cook <jcook@howard.com>; Xu, Shirley <Shirley.Xu@nrc.gov>
Subject: [External_Sender] RE: RAI #2 - Additional RAI to letter dated 7/27/21

Hello Ms. Hammond,

Please find attached Howard Lighting's response to the additional questions on RAI_MC625810.

Thank you so much for your time.

Thanks,
Abhishek



From: Hammond, Michelle <Michelle.Hammond@nrc.gov>
Sent: Friday, July 30, 2021 10:09 AM

To: Jason Cook <jcook@howard.com>; Abhishek Singh <asingh@howard.com>
Subject: RAI #2 - Additional RAI to letter dated 7/27/21

****CAUTION****

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Good Morning,

The items listed below were not adequately addressed in your response dated July 27, 2021. Additionally, please note the correct Mail Control No. and Docket No. below.

Mail Control No. 625810
Docket No. 030-39273

- 1) In your response for Item 3, you stated "We will add additional text, "Arc tube fill gas contains Kr-85. Electrodes contain Thorium." on the immediate protective, corrugated paper sleeve or box...."
The regulation in 32.15(d)(1) states "**Label or mark each unit, except timepieces or hands or dials containing tritium or promethium-147, and its container so that the manufacturer or initial transferor of the product and the byproduct material in the product can be identified.**" For Kr-85 bulbs, you will need to label the unit, not the containment of the unit. Please include how/when will this be done in the procedures.
- 2) Item 6 requested you submit procedures in accordance with 40.52(b)(3). The response did not include QC procedures to describe how the manufacturers will ensure the limit in each unit. Please submit QC procedures.

For your convenience, I have attached guidance regarding QC Procedures. Specifically note, No. 24 - No. 50.

Please respond to the request with a signed and dated letter with attachments, no later than **Friday August 6th**, so that we may continue with the review.

Thank You for your prompt consideration in this matter.

Best Regards,

*Michelle M. Hammond, M.Sc.
Health Physicist
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