

SLI LIGHTING

February 6, 2009

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and State Agreements
Office of Federal and State Materials and Environmental Management
Division of Industrial and Medical Nuclear Safety
Office of Nuclear Materials Safety and Safeguards
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Struckmeyer:

Attached are answers to your questions sent via email on February 4, 2009. Please review, if you have any additional questions my cell number is 843-421-5780 or via email.

Thank you.

Sincerely,



Kevin Bonawitz
Research, Development & Quality

QUESTION - 1

December 17, 2008

Mail Control No. 022721

SLi Lighting Products, Inc.
ATTN: Mr. Kevin J. Bonawitz
122 East Laurel St.
Mullins, SC 29575

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT DISTRIBUTION LICENSE

Dear Mr. Bonawitz:

This refers to your Application for Material License, NRC Form 313, dated September 9, 2008. We do not have sufficient information to complete the review of your application. In order to continue our review we ask that you provide the following additional information:

In order to possess and use byproduct material (i.e., radioactive material such as krypton-85), you must first satisfy the general requirements of 10 CFR 30.33. This regulation in essence requires you to apply for and obtain a specific license authorizing possession and use of radioactive material from the State of South Carolina. Please provide us with a copy of your State of South Carolina Possession and Use license.

If any of the documents you have supplied is intended to meet the requirements of Title 10, Code of Federal Regulations, Part 32, described below, please explain their relevance in your response. You should clearly indicate how any document or portion thereof relates to each of the requirements.

The requirements generally pertain to individual product models. You should indicate in your response whether any of the models are part of a design series, in which case the questions below may be answered for the series rather than the individual models. However, please indicate the models belonging to each series, and explain how they differ.

1) Title 10, Code of Federal Regulations, Section 32.14(b)(1) requires details of the chemical and physical form and maximum quantity of byproduct material in each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. It was noted that in response to Item 5 on NRC Form 313 the number "0.0005," without units, was provided for two product types, while no quantity was provided for other product types. Please provide this information for each model that you would like to distribute. **Attached are addendums A, B and C. This is information given to the NRC group in Phila. as well. It shows the max amount of KR 85 used in each sku.**

2) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. Please provide this information for each model that you would like to distribute. **The items SLi is applying for are a series of HID, compact fluorescent lamps and starters. Attached are representative specifications for these sub product groups.**

3) Title 10, Code of Federal Regulations, Section 32.14(b)(3) requires that the method of containment or binding of the radioactive byproduct material in the product be described. Please provide the method of containment or binding of the radioactive byproduct material in the product. **The products described are lamps which are sealed by press methods or lazars. None of the filler gases can leak out of the lamp unless it is handled inappropriately. (dropped)**

4) Title 10, Code of Federal Regulations, Section 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. Please provide these procedures and describe the prototype testing performed on the product. **See lamp testing procedures in the attachments**

5) Title 10, Code of Federal Regulations, Section 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet. **Same as #4.**

6) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. An attachment (nrc_label.jpg) to your email of November 26, 2008 provided a copy of a label for one model of lamp, but the relationship of this label to any of the several lamp types / models listed in another attachment (nrc metal halide bom 252.rtf) is not clear. Please indicate to which model or series this label applies. If labels for all models / series are substantially the same, this should be clearly indicated in your response. Note: For those products requiring labeling, NRC's policy is that the smallest item distributed must display the required label. If this is not possible, then the label should be placed as close as possible to the product. For example, if an electron tube is too small to label, then the label should be placed on the next smallest container, such as the bubble pack containing the electron tube. **Every lamp inner carton has the KR85 label. We also label the outer carton as well. Attached are samples of the labels.**

7) Title 10, Code of Federal Regulations, Section 32.14(c) requires that each product will contain no more than the quantity of byproduct material specified for that product in '30.15. Please provide the quantity of byproduct material specified for your product. **Same as question #1. See addendum A, B, and C.**

8) Title 10, Code of Federal Regulations, Section 32.14(d)(1) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe how the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. **The items in question are lightbulbs. Lightbulbs are sealed by press and lazar methods so none of the filler gases can release. The KR85 is properly contained and will not release with normal use and handling.**

9) Title 10, Code of Federal Regulations, Section 32.15(a)(1) requires that each person licensed under '32.14 shall maintain quality assurance practices in the manufacture of the

part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. **This is also covered by the attachments in our answers to questions 4 + 5.**

10) Title 10, Code of Federal Regulations, Section 32.15(a)(3) requires that each person licensed under '32.14 shall visually inspect each unit in inspection lots. Any unit that has an observable physical defect that could affect containment of the byproduct material shall be considered as a defective unit. Please describe how you shall visually inspect each unit in inspection lots for defects. **Same as question 9.**

11) Title 10, Code of Federal Regulations, Section 32.15(c) requires that no person licensed under '32.14 shall transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. **I am in charge of R+D and quality for Sylvania in the America's. All defective lamps returned by US cusotomers are reviewed.**

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information. In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Any correspondence regarding your amendment application should reference the control number specified above.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

	ITEM 5A	ITEM 5B	ITEM 5C	ITEM 5C
Total Kr 85 #'s in microcuries	Kr 85 amount		in stock units	max total Kr 85
product type				
Starters and glo-bottles	0.0005	gas	855,877	427.94 microcuries
compact fluorescent lamps	0.0005	gas	177,446	88.72 microcuries
HID lamps used in:	see hid pg	gas	90,628	187.486 microcuries
General Lighting, Tanning beds, Photo Optic applications, Aquariums	below	gas		
Totals				704.15 microcuries 1000.00 microcuries max inventory
Item 6	Lamp distribution			
Item 7	Ingrid Lohrengel	San Jose Costa Rica		Manager Facilities Environment and Safety
	Patrick Beerten	Tienen Belgium		Manager Facilities Environment and Safety
	John Stocks	Shipleigh England		Manager Facilities Environment and Safety
Item 8	see attached Havells Sylvania Training documents			
Item 9	Manufacturer/Distributor of Lighting Products			
Item 10	see attached Havells Sylvania Training documents			
Item 11	Follow all hazardous waste rules and regulations per state and country			

Addendum A --CFL

Short	WH	Part description	Lamp type	kr 85	On hand	hours	wattage	color	base type	bulb	lumens	weight	length	width	height	cu ft	Pkg	Item UPC code	Ctn UPC code
26393	CA	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	0	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26393	D1	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	0	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26393	FL	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	50	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26393	HS	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	150	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26393	IN	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	138	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26393	MS	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	50	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26393	NJ	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	170	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26393	PH	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	90	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26393	TX	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	0	10000	26 3000K	G24D-3	T3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8
26480		CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	808	10000	5 5000K	G23	T3	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5
26480	CA	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	88	10000	5 5000K	G23	T3	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5
26480	D1	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	277	10000	5 5000K	G23	T3	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5
26480	FL	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	100	10000	5 5000K	G23	T3	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5
26480	NJ	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	250	10000	5 5000K	G23	T3	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5
26480	PH	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	5 5000K	G23	T3	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5
26481		CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	47	10000	7 5000K	G23	T3	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2
26481	D1	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	125	10000	7 5000K	G23	T3	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2
26481	FL	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	200	10000	7 5000K	G23	T3	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2
26481	HS	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	628	10000	7 5000K	G23	T3	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2
26481	IN	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	155	10000	7 5000K	G23	T3	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2
26481	NJ	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	109	10000	7 5000K	G23	T3	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2
26481	PH	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	7 5000K	G23	T3	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2
26482		CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	805	10000	9 5000K	G23	T3	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9
26482	CA	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	9 5000K	G23	T3	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9
26482	D1	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	82	10000	9 5000K	G23	T3	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9
26482	FL	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	9 5000K	G23	T3	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9
26482	HS	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	38	10000	9 5000K	G23	T3	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9
26482	IN	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	130	10000	9 5000K	G23	T3	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9
26482	NJ	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	100	10000	9 5000K	G23	T3	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9
26482	PH	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	9 5000K	G23	T3	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9
26483		CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	9736	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	CA	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	302	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	D1	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	88	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	FL	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	HS	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	150	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	IN	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	200	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	NJ	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	350	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	PH	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	TX	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	150	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
26483	WA	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	13 5000K	GX23	T3	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6
30606		F91T QUAD/827	LYNX DOUBLE	0.0005 microcuries	2445	10000	9 2700K	G23-2	T3	T3	525	6.4	14.4	7.5	5.9	0.37	50	006-64608-26090-9	106-64608-26090-6
30617		F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	8881	10000	22 2700K	GX32D-2	T4	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8
30617	D1	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	109	10000	22 2700K	GX32D-2	T4	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8
30617	FL	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	50	10000	22 2700K	GX32D-2	T4	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8
30617	IN	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	147	10000	22 2700K	GX32D-2	T4	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8
30617	MS	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	50	10000	22 2700K	GX32D-2	T4	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8
30617	NJ	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	110	10000	22 2700K	GX32D-2	T4	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8
30618		F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	14	10000	28 2700K	GX32D-3	T4	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6
30618	D1	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6
30618	FL	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6
30618	HS	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6
30618	IN	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6
30618	PH	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6
70420		CFS/13/850 25 PK TETRA	13 CFS	0.0005 microcuries	2000	10000	13 5000K	GX23	T3	T3	850	0	17	10.75	17	1.8	25		
70420	RP	CFS/13/850 25 PK TETRA	13 CFS	0.0005 microcuries	0	10000	13 5000K	GX23	T3	T3	850	0	17	10.75	17	1.8	25		
78466		CFS13W/850 200P MARINELAND	CFS13W/850	0.0005 microcuries	0	10000	13 5000K	GX23	T3	T3	850	0	0	0	0	0	200		
78471		CF13LS/QUANTUM PARACLIPSE 50PK	CF13LS	0.0005 microcuries	0	10000	13 BL368	GX23	T3	T3	0	6	9.25	7.5	7.5	0.3	50		
96083		CF13LS/827 10PK	13W TWIN	0.0005 microcuries	40	10000	13 2700K	GX23	T3	T3	850	0	8.25	5	3.5	0.08	10	006-64608-96083-0	106-64608-96083-7
96091		CF13LD/827 10PK	LYNX DOUBLE	0.0005 microcuries	0														

Addendum B -- HID

Short	Long product cd	Part description	Concentration Kr85		Volume arc tube (in cm3)	Filling pressure (mbar)	radioactivity in	radioactivity in	Lamp type	On hand	total micro Ci	weight	length	width	height	cu ft	Item UPC code	Ctn UPC code	
			in filling gas (MBq/l)	MBq			microCi												
20250	5020250-SLI	MBS ES36 39W 8	1.11	0.0785	400	400	3.49E-05	0.000941058	ES16	435	0.40936	8	189	11.25	5	6.15	006-64608-20250-3		
20251	5020251-SLI	MBS ES36 39W 24	1.11	0.0785	400	400	3.49E-05	0.000941058	ES16	465	0.437592	9	18	11	5	0.57	000-64608-20251-8		
20270	5020270-SLI	MBS ES16 39W 38 15PK	1.11	0.0785	400	400	3.49E-05	0.000941058	ES16	72	0.067756	2	11	6.5	3	0.12	000-64608-20270-9	106-64608-20270-8	
20271	5020271-SLI	MBS ES16 39W 60 15PK	1.11	0.0785	400	400	3.49E-05	0.000941058	ES16	185	0.174096	2	11	6.5	3	0.12	000-64608-20271-6	600-64608-20271-8	
20272	5020272-SLI	MBS ES16 39W 24 15PK	1.11	0.0785	400	400	3.49E-05	0.000941058	ES16	0	0	2	11	6.5	3	0.12	000-64608-20272-3	000-64608-20272-3	
21040	5021040-70	MH150 DE 20K 10PK	1.11	1.85	400	105.2631579	2.16E-04	0.005836263	MH MED	1650	9.629834	2	8.75	8.25	4	0.17	006-64608-21040-9	106-64608-21040-6	
21041	5021041-70	MH250 DE 20K 10PK	1.11	4.17	400	105.2631579	4.87E-04	0.01315253	MH MOG	1370	18.0227	2	11.5	11	5	0.37	006-64608-21041-6	106-64608-21041-3	
21042	5021042-70	MH150 DE 13K	1.11	1.85	400	105.2631579	2.16E-04	0.005836263	MH MED	738	4.2488	2	8	6.75	2.75	0.1	006-64608-21042-3	106-64608-21042-0	
21043	5021043-70	MH250 DE 13K 12PK	1.11	4.17	400	105.2631579	4.87E-04	0.01315253	MH MOG	650	8.550914	2	9	6.75	7.75	0.01	006-64608-21043-0	106-64608-21043-7	
54260	5024260-SLI	PBF 400W S PURE BRONZE 1PK	1.11	3.26	100	100	3.62E-04	0.00977022	SUNTAN	4754	46.44763	5	19.75	10	7.75	0.89	006-64608-54260-9	006-64608-54260-7	
54261	5024261-SLI	PBF 400W C PURE BRONZE 1PK	1.11	3.26	100	100	3.62E-04	0.00977022	SUNTAN	120	1.172426	5	19.75	10	7.75	0.89	000-64608-54261-4	000-64608-54261-4	
54262	5024262-SLI	PBF 400W SE PURE BRONZE 1PK	1.11	3.26	100	100	3.62E-04	0.00977022	SUNTAN	2330	22.76461	5	19.75	10	7.75	0.89	006-64608-54262-3	106-64608-54262-0	
54270	5024270-SLI	PBF 500W S PURE BRONZE 1PK	1.11	4.797	50	50	2.66E-04	0.007188305	SUNTAN	296	2.127738	5	19.75	10	7.75	0.89	006-64608-54270-8	106-64608-54270-5	
54271	5024271-SLI	PBF 500W C PURE BRONZE 1PK	1.11	4.797	50	50	2.66E-04	0.007188305	SUNTAN	82	0.589441	7	19.75	10	7.75	0.89	006-64608-54271-5	106-64608-54271-2	
54272	5024272-SLI	PBF 500W SE PURE BRONZE 50PK	1.11	4.797	50	50	2.66E-04	0.007188305	SUNTAN	1552	11.15625	7	19.75	10	7.75	0.89	006-64608-54272-2	106-64608-54272-9	
54280	5024280-SLI	PBF 1000W C 230V PURE BRZE 1PK	1.11	16.73	50	50	9.29E-04	0.025069905	SUNTAN	258	6.468035	10	19.75	10	7.75	0.89	006-64608-54280-7	106-64608-54280-4	
54281	5024281-SLI	PBF 1000W C 400V PURE BRNZ 1PK	1.11	16.73	50	50	9.29E-04	0.025069905	SUNTAN	62	1.554334	10	20	10	8	0.93	006-64608-54281-4	106-64608-54281-1	
54290	5024290-SLI	PBF 2000W C 400V PURE BRNZ 1PK	1.11	27.92	50	50	1.55E-03	0.04183812	SUNTAN	392	16.40054	4	17	12.25	7.25	0.87	006-64608-54290-6	106-64608-54290-3	
73904	7223904-70	HID BA400 SE HR 10PK	1.11	1.2	400	400	5.33E-04	0.0143956	HID BA400	91	1.30909	1	9.5	3.75	7	0.14	006-64608-73904-7	106-64608-73904-4	
73915	7223915-70	HID BA575 DE 10PK	1.11	2.06	400	400	9.15E-04	0.02468528	HID	15	0.370429	0	9	0	0	0	0	006-64608-73915-3	106-64608-73915-0
73916	7223916-70	BA1200 DE 10PK	1.11	5.37	400	400	2.38E-03	0.06437556	BA1200	0	0	5	16.75	12.25	7	0.83	006-64608-73916-0	106-64608-73916-7	
73917	7223917-70	BA 2500 /DE 1PK	1.11	13.1	400	400	5.82E-03	0.1570428	BA 2500	5	0.785214	1	0	0	0	0	0	0	0
73919	7223919-70	HID BA1200 DE 1PK	1.11	5.37	400	400	2.38E-03	0.06437556	HID	0	0	0	0	0	0	0	0	0	0
73939	7223939-70	HID BA575 SE HR 10PK	1.11	2.1	200	200	4.66E-04	0.0125874	HID BA575	0	0	5	16.75	12.25	7	0.83	006-64608-73939-9	106-64608-73939-6	
73949	7223949-70	HID BA1200 SE HR 10PK	1.11	4.51	400	400	2.00E-03	0.05406588	HID BA1200	44	2.378899	4	16.75	12.25	7	0.83	006-64608-73949-8	106-64608-73949-5	
73951	7003951-70	BA2500W/SE/HR	1.11	13.1	400	400	5.82E-03	0.1570428	BA250	14	2.198599	0	19	14	13	2			
73954	7223954-70	BA4000W DE 1PK	1.11	29.3	400	400	1.30E-02	0.3512484	BA4000	2	0.702497	1	19.5	5	5	0.28			
73956	7223956-70	HID BA200 SE HR 10PK	1.11	0.9	400	400	4.00E-04	0.0107892	HID BA200	94	1.014185	1	9.5	4	7.25	0.16	006-64608-73956-6	106-64608-73956-3	
73969	7223969-70	HID S BS575W DE	1.11	2.06	400	400	9.15E-04	0.02468528	HID S BS575W	35	0.864335	4	16.75	12.25	7.5	0.89	006-64608-73969-6	106-64608-73969-3	
73983	7223983-70	BA 575W SE D 10PK	1.11	2.1	200	200	0.0125874	BA575	16	0.201398	0	0	0	0	0	0	006-64608-73983-2	106-64608-73983-9	
73991	7223991-70	HID BA800 SE HR 10PK	1.11	4.24	600	600	2.82E-03	0.07524358	HID BA800	37	2.821016	6	17	12.25	7	0.84	006-64608-73991-7	106-64608-73991-4	
73993	7223993-70	BA250 SE D 5800K 10PK	1.11	1.2	200	200	2.66E-04	0.0071928	BA250	15	0.107882	1	9.5	4	7.25	0.16	006-64608-73993-1	106-64608-73993-8	
73997	7223997-70	BA1200/2 DE S 7.2 10PK	1.11	1.92	200	200	4.26E-04	0.01150848	BA1200	99	1.19334	4	16.75	12.25	7	0.83			
73999	7223999-70	BA250/2 SE D 8.5 10PK	1.11	1.2	200	200	2.66E-04	0.0071928	BA250	559	4.020775	1	9.5	4	7.25	0.16	006-64608-73999-3	106-64608-73999-0	
74001	7224001-70	BA 575/2 SE 8.5	1.11	2.1	200	200	4.66E-04	0.0125874	BA575	52	0.654545	5	17	12.25	7.25	0.87	006-64608-74001-2	106-64608-74001-9	
74413	7224413-70	BA 575/2 SE NHR 7.2 10PK	1.11	2.1	200	200	4.66E-04	0.0125874	BA575	487	6.130064	4	16.75	12.25	7	0.83	006-64608-74413-3	106-64608-74413-0	
20301	5020301-SLI	MH70U/MEDIUM 12PK	1.11	0.000467	400	400	0.000467	Metal Halide	1098	0.051277	12	11	9.1	6.3	6.3	0.36	006-64608-20301-2	106-64608-20301-9	
20302	5020302-SLI	MH100U/MEDIUM 20PK	1.11	0.000711	400	400	0.000711	Metal Halide	1774	0.126131	12	11	9.1	6.3	6.3	0.36	006-64608-20302-9	106-64608-20302-6	
20303	5020303-SLI	MH150U/MED 12PK	1.11	0.000901	400	400	0.000901	Metal Halide	2185	0.196869	12	11	9.1	6.3	6.3	0.36	006-64608-20303-6	106-64608-20303-3	
28901	3028901-SLI	MH170P/U/MED 20PK	1.11	0.000467	400	400	0.000467	Metal Halide	3674	0.171576	0	14	11.5	7.75	0.72	006-64608-28901-6	106-64608-28901-3		
28904	3028904-SLI	MH100P/U/MED 20PK	1.11	0.000711	400	400	0.000711	Metal Halide	4630	0.330615	0	14	11.5	7.5	7.5	0.7	006-64608-28904-7	106-64608-28904-4	
29001	3029001-SLI	MH250/PS/BU 6PK	1.11	0.000449	400	400	0.000449	Metal Halide	457	0.068003	3	11.25	7.75	9.5	6.75	0.48	006-64608-29001-2	106-64608-29001-9	
29002	3029002-SLI	MH175/PS/MEDIUM 12PK	1.11	0.000122	400	400	0.000122	Metal Halide	311	0.037942	0	10.25	8	8	6.75	0.32	006-64608-29002-9	106-64608-29002-6	
29003	3029003-SLI	MH320/PS/BU 12PK	1.11	0.0002103	400	400	0.0002103	Metal Halide	2604	0.547621	2	11	7.75	9	6.75	0.44	006-64608-29003-6	106-64608-29003-3	
29004	3029004-SLI	MH400/PS/BU 6PK	1.11	0.0002663	400	400	0.0002663	Metal Halide	1328	0.353646	5	15.25	10.25	12	10.9	0.06	006-64608-29004-3	106-64608-29004-0	
29100	3029100-SLI	MH400/PS/BU 6PK	1.11	0.0002663	400	400	0.0002663	Metal Halide	738	0.196529	6	15.25	10.25	12	10.9	0.06	006-64608-29100-2	106-64608-29100-9	
29113	3029113-01	MH350/PS/BU 6PK	1.11	0.0002103	400	400	0.0002103	Metal Halide	2963	0.623119	0	15.25	10.25	12	10.9	0.06	006-64608-29113-2	106-64608-29113-9	
30006	SM401-031-01	MH175U/MED 20PK	1.11	0.000122	400	400	0.000122	Metal Halide	8013	0.977586	3	11.5	6.5	11.5	11.5	0.5	006-64608-30006-3	106-64608-30006-0	
30007	SM411-031-01	MH175U 6PK	1.11	0.000122	400	400	0.000122	Metal Halide	7009	0.855098	3	11	8	9.5	8	0.48	006-64608-30007-0	106-64608-30007-7	
30009	SM511-031-01	MH250U 6PK	1.11	0.000149	400	400	0.000149	Metal Halide	11675	1.739575	2.85	11.25	8	9	9	0.47	006-64608-30009-4	106-64608-30009-1	
30011	SN611-030-01	MH400U 6PK	1.11	0.0002663	400	400	0.0002663	Metal Halide	16901	4.500736	4.7	16	11	12.5	12.5	1.27	006-64608-30		

Addendum C -- starters

Short	WH	Long product cd	Part description	Lamp type	kr85	On hand	length	width	height	cu ft	Item UPC code	Ctrl UPC code
18342		428325P	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	1349	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	CA	428325P-CA	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	475	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	D1	428325P-D1MVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	413	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	FL	428325P-FLMVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	375	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	HS	428325P-HS	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	200	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	IN	428325P-INMVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	825	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	MS	428325P-MS	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	NJ	428325P-NJMVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	975	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	PH	428325P-PH	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	200	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	TX	428325P-TXMVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	675	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	WA	428325P-WA	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18343		448325P	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	7040	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	CA	448325P-CASF	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	475	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	D1	448325P-D1MVL	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	250	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	FL	448325P-FLMVL	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	HS	448325P-HS	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	200	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	IN	448325P-IN	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	650	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	NJ	448325P-NJ	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	875	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	PH	448325P-PH	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	TX	448325P-TXMVL	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	175	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	WA	448325P-WA	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18344		458225P	FS5 STARTER 25PK	STARTER	0.0005 microcuries	2475	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	CA	458225P-CA	FS5 STARTER 25PK	STARTER	0.0005 microcuries	225	0	0	0	0	000-51849-18344-7	500-51849-18344-2
18344	D1	458225P-D1	FS5 STARTER 25PK	STARTER	0.0005 microcuries	125	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	FL	458225P-FL	FS5 STARTER 25PK	STARTER	0.0005 microcuries	275	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	IN	458225P-IN	FS5 STARTER 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	MA	458225P-MA	FS5 STARTER 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	NJ	458225P-NJ	FS5 STARTER 25PK	STARTER	0.0005 microcuries	250	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	PH	458225P-PH	FS5 STARTER 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	TX	458225P-TX	FS5 STARTER 25PK	STARTER	0.0005 microcuries	175	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	WA	458225P-WA	FS5 STARTER 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18345		438225P	FS12 STARTER 25PK	STARTER	0.0005 microcuries	7890	18	9.75	9.5	0.96	000-51849-18345-4	500-51849-18345-9
18345	D1	438225P-D1	FS12 STARTER 25PK	STARTER	0.0005 microcuries	166	18	9.75	9.5	0.96	000-51849-18345-4	500-51849-18345-9
18345	IN	438225P-IN	FS12 STARTER 25PK	STARTER	0.0005 microcuries	25	0	0	0	0	000-51849-18345-4	500-51849-18345-9
18345	NJ	438225P-NJ	FS12 STARTER 25PK	STARTER	0.0005 microcuries	350	18	9.75	9.5	0.96	000-51849-18345-4	500-51849-18345-9
18346		428225P	FS22 STARTER 25PK	STARTER	0.0005 microcuries	3182	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18346	CA	428225P-CASF	FS22 STARTER 25PK	STARTER	0.0005 microcuries	475	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18346	D1	428225P-D1	FS22 STARTER 25PK	STARTER	0.0005 microcuries	500	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18346	FL	428225P-FL	FS22 STARTER 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18346	IN	428225P-IN	FS22 STARTER 25PK	STARTER	0.0005 microcuries	2375	18	9.75	9.5	0	000-51849-18346-1	500-51849-18346-6
18346	NJ	428225P-NJ	FS22 STARTER 25PK	STARTER	0.0005 microcuries	275	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18347		425325P	FS25 STARTER 25PK	STARTER	0.0005 microcuries	14865	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	CA	425325P-CA	FS25 STARTER 25PK	STARTER	0.0005 microcuries	239	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	D1	425325P-D1	FS25 STARTER 25PK	STARTER	0.0005 microcuries	370	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	FL	425325P-FL	FS25 STARTER 25PK	STARTER	0.0005 microcuries	25	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	IN	425325P-IN	FS25 STARTER 25PK	STARTER	0.0005 microcuries	675	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	NJ	425325P-NJ	FS25 STARTER 25PK	STARTER	0.0005 microcuries	600	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	PH	425325P-PH	FS25 STARTER 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	TX	425325P-TX	FS25 STARTER 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	WA	425325P-WA	FS25 STARTER 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18349		423021	FS20 STARTER 10PK	STARTER	0.0005 microcuries	90	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	CA	423021-CASF	FS20 STARTER 10PK	STARTER	0.0005 microcuries	40	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	D1	423021-D1	FS20 STARTER 10PK	STARTER	0.0005 microcuries	80	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	FL	423021-FL	FS20 STARTER 10PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	HS	423021-HS	FS20 STARTER 10PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	NJ	423021-NJ	FS20 STARTER 10PK	STARTER	0.0005 microcuries	80	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7

Addendum C -- starters

Short	WH	Long product cd	Part description	Lamp type	kr85	On hand	length	width	height	cu ft	Item UPC code	Ctn UPC code
18349	TX	423021-TX	FS20 STARTER 10PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18350		438660P-66	FS-12 N/C CERTIFIED STARTER	STARTER	0.0005 microcuries	35000	0	0	0	0		
31644		4220010	ASSY-22 T GLOBOTTLE ASSEMBLY	STARTER	0.0005 microcuries	0	0	0	0	0		
31645		4220015	ASSY-22S GLOB.ASY - #SP4-25	STARTER	0.0005 microcuries	0	0	0	0	0		
31646		4220022	ASS-22H GLOBOTTLE ASY.	STARTER	0.0005 microcuries	0	0	0	0	0		
31647		423000	FS-20 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
31649		4230211	FS-20 (COP20) S 10PK US-GOV'T	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31649	RF	4230211-RF	FS-20(COP0) S 10PK US GOV'T	STARTER	0.0005 microcuries	5000	18.5	10	9.5	1.02		
31650		425000P	FS-25 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31651		425120P	FS-25 SYLVANIA 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
31652		425121P	FS-25 SLI 10 PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03		
31652	RF	425121-P	FS-25 SLI 10 PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03		
31652	RP	31652-RP	FS-25 SLI 10 PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03		
31653		425123P	FS-21 HEMCO BULK	STARTER	0.0005 microcuries	2000	10.75	10.75	16	1.07		
31655		425180P	FS-25 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	20000	10.75	10.75	16	1.07		
31656		425260P	FS-25 HEMCO 25 PK	STARTER	0.0005 microcuries	1800	17.75	9.75	9.5	0.95		
31657		425300P	FS-25 CERTIFIED 25 PK	STARTER	0.0005 microcuries	1325	0	0	0	0		
31659		425350P	FS-25 HEMCO BULK	STARTER	0.0005 microcuries	0	10.75	10.75	16	1.07		
31660		425390P	FS-25 CERTIFIED BULK	STARTER	0.0005 microcuries	5000	0	0	0	0		
31661		425420P	FS-25 LEV(WWG)10PK #500-13889	STARTER	0.0005 microcuries	2200	18.75	10	9.5	1.03		
31662		426001	FS-22 SLI PLASTIC	STARTER	0.0005 microcuries	7000	18.5	10	9.5	1.02		
31663		427001	FS-11 SLI 10 PK	STARTER	0.0005 microcuries	3814	18.5	10	9.5	1.02		
31663	WA	427001-WA	FS-11 SLI 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31664		428000P	FS-2 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31665		428120P	FS-2 SYLVANIA 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
31666		428121P	FS-2 SLI 10 PK	STARTER	0.0005 microcuries	500	18.75	10	9.5	1.03		
31666	RF	428121P-CRS	FS-2 SLI 10 PK	STARTER	0.0005 microcuries	1000	18.75	10	9.5	1.03		
31667		428122	FS-2 GOVT (10 PK)	STARTER	0.0005 microcuries	0	0	0	0	0		
31668		428170P	FS-2 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	10000	10.75	10.75	16	1.07		
31672		428240P	FS-22 HEMCO BULK	STARTER	0.0005 microcuries	7000	10.75	10.75	16	1.07		
31673		428270P	FS-2 LEV.BLK #CA-950-12409-000	STARTER	0.0005 microcuries	0	10.75	10.75	16	1.07		
31674		428300P	FS-22 SLI BULK	STARTER	0.0005 microcuries	84800	10.75	10.75	16	1.07		
31676		428380P	FS-2 HEMCO 25 PK	STARTER	0.0005 microcuries	1950	18	10	9.5	0.99		
31677		428410P	FS-2 LEVITON 10 PK #000-13886	STARTER	0.0005 microcuries	7000	18.75	10	9.5	1.03		
31678		428420P	FS-2 LEV(WWG) 10PK #500-13886	STARTER	0.0005 microcuries	8700	18.5	10	9.5	1.02		
31679		428430P	FS-2 HEMCO BULK	STARTER	0.0005 microcuries	1000	0	0	0	0		
31680		428490P	FS-2 CERTIFIED 25 PK	STARTER	0.0005 microcuries	2150	18	10	9.5	0.99		
31680	FL	428490P-FL	FS-2 CERTIFIED 25 PK	STARTER	0.0005 microcuries	175	18	10	9.5	0.99		
31681		428500	FS-22H SLI POLYCARB. W/HOLE	STARTER	0.0005 microcuries	20000	10.75	10.75	16	1.07		
31682		428830P	FS-2 CERTIFIED BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
31682	DT	428830P-DT	FS-2 CERTIFIED BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
31684		438260P	FS-12 LEV/BK CA-950-12411-000	STARTER	0.0005 microcuries	0	0	0	0	0		
31685		438380P	FS-12 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	3000	10.75	10.75	16	1.07		
31686		441000	FS-40/400 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31687		441020	FS-40/400 (COP-40/400) SYL.	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03		
31690		4413500	FS-40/400 LEVITON II(WWG)	STARTER	0.0005 microcuries	1630	18.75	10	9.5	1.03		
31691		448000P	FS-4 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31692		448120P	FS-4 SYLVANIA 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
31693		448121P	FS-4 SLI 10 PK	STARTER	0.0005 microcuries	2100	18.75	10	9.5	1.03		
31694		448170P	FS-4 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	12000	10.75	10.75	16	1.07		
31695		448200P	FS-4 SYLVANIA BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
31697		448270P	FS-4 LEV.BLK #CA-950-12410-000	STARTER	0.0005 microcuries	0	10.75	10.75	16	1.07		
31699		448370P	FS-4 HEMCO 25 PK	STARTER	0.0005 microcuries	375	18	10	9.5	0.99		
31700		448410P	FS-4 LEVITON 10 PK #000-13891	STARTER	0.0005 microcuries	4500	18.5	10	9.5	1.02		
31701		448420P	FS-4 LEV(WWG) 10PK #500-13891	STARTER	0.0005 microcuries	6200	18.5	10	9.5	1.02		
31702		448500P	FS-4 SLI W/ HOLE BULK	STARTER	0.0005 microcuries	0	0	0	0	0		

Addendum C -- starters

Short	WH	Long product cd	Part description	Lamp type	kr85	On hand	length	width	height	cu ft	Item UPC code	Ctn UPC code
31703		448520P	FS-4 HEMCO BULK	STARTER	0.0005 microcuries	14000	10.75	10.75	16	1.07		
31704		448630P	FS-4 CERTIFIED 25 PK	STARTER	0.0005 microcuries	1125	18	10	9.5	0.99		
31704	FL	448630P-FL	FS-4 CERTIFIED 25 PK	STARTER	0.0005 microcuries	75	18	10	9.5	0.99		
31704	RF	448630P-CRS	FS-4 CERTIFIED 25 PK	STARTER	0.0005 microcuries	0	18	10	9.5	0.99		
31705		448830P	FS-4 CERTIFIED BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
31706		458000P	FS-5 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31707		458121P	FS-5 SYLVANIA 10 PK	STARTER	0.0005 microcuries	9990	18.5	10	9.5	1.02		
31708		458122P	FS-5 SLI 10 PK	STARTER	0.0005 microcuries	4500	18.5	10	9.5	1.02		
31710		458180P	FS-5 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	4000	10.75	10.75	16	1.07		
31711		458190P	FS-5 HEMCO 25 PK	STARTER	0.0005 microcuries	2350	17.75	9.75	9.5	0.95		
31713		458260P	FS-5 HEMCO BULK	STARTER	0.0005 microcuries	6000	10.75	10.75	16	1.07		
31714		458280P	FS-5 CERTIFIED BULK	STARTER	0.0005 microcuries	1000	10.75	10.75	16	1.07		
31715		458330P	FS-5 CERTIFIED 25 PK	STARTER	0.0005 microcuries	500	17.75	9.75	9.5	0.95		
31715	FL	458330P-FL	FS-5 CERTIFIED 25 PK	STARTER	0.0005 microcuries	175	17.75	9.75	9.5	0.95		
31716		458410P	FS-5 LEVITON 10 PK #000-13894	STARTER	0.0005 microcuries	2900	18.5	10	9.5	1.02		
31717		458420P	FS-5 LEV(WWG) 10PK #500-13894	STARTER	0.0005 microcuries	1000	18.5	10	9.5	1.02		
31718		4590000	COSMEDICO 100W STARTER	STARTER	0.0005 microcuries	0	0	0	0	0		
31719		4591000	COSMEDICO 140W STARTER	STARTER	0.0005 microcuries	0	0	0	0	0		
31720		482230	GB-22E GLOBOTTLE	STARTER	0.0005 microcuries	29449	27	10.25	10	1.6		
31721		4822310	GB-22E GE	STARTER	0.0005 microcuries	28000	27	10.25	10	1.6		
31722		4822320	GB-22E GLOBOTTLE/ROBERTSON	STARTER	0.0005 microcuries	0	0	0	0	0		
31723		482310	GB-22 TL GLOBOTTLE	STARTER	0.0005 microcuries	0	27	10.25	10	1.6		
31726		485520	GB-26 GLOBTTLE	STARTER	0.0005 microcuries	0	27	10.25	10	1.6		
31727		485530	GB-26 GREEN STRIPE GLOBOTTLE	STARTER	0.0005 microcuries	6000	27	10.25	10	1.6		
31728		485760	GB-58	STARTER	0.0005 microcuries	2000	27	10.25	10	1.6		
31729		485770	GB-43 GLOBOTTLE	STARTER	0.0005 microcuries	58000	0	0	0	0		
31730		485780	GB-43 TL	STARTER	0.0005 microcuries	42000	27	10.25	10	1.6		
31733		491146	FS-2B REGENT	STARTER	0.0005 microcuries	0	18.25	9.5	19	1.91		
31734		491153	FS-2C #256149/34540	STARTER	0.0005 microcuries	75475	18.5	9.5	18	1.83		
31735		492143	FS-4B REGENT	STARTER	0.0005 microcuries	18300	18.25	9.5	19	1.91		
31736		492150	FS-4C #256156/34541	STARTER	0.0005 microcuries	45825	0	0	0	0		
31737		493140	FS-5B REGENT	STARTER	0.0005 microcuries	12625	18.25	9.5	19	1.91		
31738		493157	FS-5C #166402/19940	STARTER	0.0005 microcuries	3625	18.5	9.5	18	1.83		
31739		494147	FS-12B REGENT	STARTER	0.0005 microcuries	0	18.25	9.5	19	1.91		
31740		494154	FS-12C #256164/34542	STARTER	0.0005 microcuries	2450	18.5	9.5	18	1.83		
31741		495144	FS-22B REGENT	STARTER	0.0005 microcuries	9275	18.25	9.5	19	1.91		
31746		496141	FS-25B REGENT	STARTER	0.0005 microcuries	5350	18.25	9.5	19	1.91		
31747		496158	FS-25C #256172/5331	STARTER	0.0005 microcuries	15025	18.5	9.5	18	1.83		
32024		425181P	FS-25 UNIV. EVERBRITE 250 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32025		425410P	FS-25 LEVITON 10 PK #000-13889	STARTER	0.0005 microcuries	1550	18.75	10	9.5	1.03		
32027		433021	FS-30 S (COP 30) 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32029		438270P	FS-12 LEVITON 10 PK #000-13885	STARTER	0.0005 microcuries	1100	0	0	0	0		
32030		441030	FS-40/400 GE	STARTER	0.0005 microcuries	0	0	0	0	0		
32031		445410	FS-4NA LEVITON 10/PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32032		445520	FS-40/400A (FS-4NA) SYL. 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32033		445521	FS-40/400A (FS-4NA) SLI 10 PK	STARTER	0.0005 microcuries	0	18.25	10	9.5	1		
32034		446501	FS-2NA SLI 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32035		465010	FS64NAHUBBELL	STARTER	0.0005 microcuries	0	0	0	0	0		
32036		468101	FS-85 (FS-6) SLI	STARTER	0.0005 microcuries	0	0	0	0	0		
32037		468141	FS-85-4 (FS-64) SLI	STARTER	0.0005 microcuries	0	0	0	0	0		
32038		484130	GB-44 BLUE GLOBOTTLE replace w	STARTER	0.0005 microcuries	0	0	0	0	1.56		
32039		49113	FS-2C EVERBRITE UNIVERSAL	STARTER	0.0005 microcuries	0	0	0	0	0		
32040		49121	FS-2X ON GUARD 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32041		49202	FS-4 DURA BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
32042		49224	FS-4X GAMPAK BULK	STARTER	0.0005 microcuries	0	8.5	9	16.5	0.73		
32043		49315	FS-5C #166402/19940	STARTER	0.0005 microcuries	0	0	0	0	0		

Addendum C -- starters

Short	WH	Long product cd	Part description	Lamp type	kr85	On hand	length	width	height	cu ft	Item UPC code	Ctn UPC code
32044		49400	FS-12 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32046		49402	FS-12 DURA BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
32048		49421	FS-12X ON GUARD 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32049		49500	FS-22 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32050		49501	FS-22 DURA 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32051		49511	FS-22C ON GUARD 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32052		49600	FS-25 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32053		49670	FS-8 DURA	STARTER	0.0005 microcuries	0	0	0	0	0		
32054		49700	FS-85 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32055		49710	FS85-4 DURA	STARTER	0.0005 microcuries	0	0	0	0	0		
32056		49835	FS-40 DURA	STARTER	0.0005 microcuries	0	0	0	0	0		
32057		49836	FS-40 DURA 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32058		49856	FS-40/400 GE	STARTER	0.0005 microcuries	0	0	0	0	0		
32059		49900	FS-850 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32060		49906	FS-850 GE	STARTER	0.0005 microcuries	0	0	0	0	0		
32061		49910	FS-852 DURA	STARTER	0.0005 microcuries	0	0	0	0	0		
32062		49930	FS-2NA DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32063		49940	FS-2NA DURA 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32064		49960	FS-4NA DURA 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32065		49970	FS-85NA DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32093		438120P	FS-12 SYLVANIA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32123		4220012-CR	ASSY-22TB/P GLOBOTTLE ASSY	STARTER	0.0005 microcuries	0	0	0	0	0		
32144		4822360-66	GB-22E GLOWBOTTLE/CUT LEADS	STARTER	0.0005 microcuries	0	0	0	0	0		
32148		423020-66	FS-20(COP-20)SYLVANIA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32198		4413600-66	FS-40 HUB BULK STARTERS 1000PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32217		4230300-CR	COP 20 UNETCHED 10PK	STARTER	0.0005 microcuries	0	10.75	10.75	16	1.07		
35025		35025-65	PBS-25 STARTER 10PK	STARTER	0.0005 microcuries	1900	8.5	1.38	0.78	0.01		
35100		35100-65	PBS-100 STARTER 10PK	STARTER	0.0005 microcuries	2350	0	0	0	0		
35160		35160-65	PBS-160 STARTER	STARTER	0.0005 microcuries	5870	0	0	0	0		
81220		4281220-67	FS2 METAL STARTER 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
81220 RF		4281220-RF67	FS2 METAL STARTER 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
90001		9VFS4P-SLI	FS4 STARTER (per) 2 PACK	FS4 STARTER	0.0005 microcuries	35	4.75	5.75	6.25	0.1	006-64608-90001-0	600-64608-90001-0
90001 NJ		448210P-NJ	FS4 STARTER (per) 2 PACK	FS4 STARTER	0.0005 microcuries	160	4.75	5.75	6.25	0.1	006-64608-90001-0	600-64608-90001-0
90004		428210P	FS2 STARTER 1 000 PACK	STARTER	0.0005 microcuries	19000	11	10.75	16	1.09		
90005		448210P	FS4 STARTER 1 000 PACK	STARTER	0.0005 microcuries	96000	11	10.75	16	1.09		
90005 NJ		9VFS4B-NJSLI	FS4 STARTER 1 000 PACK	STARTER	0.0005 microcuries	0	11	10.75	16	1.09		
90006		458171P	FS5 STARTER 1 000 PACK	STARTER	0.0005 microcuries	8000	11	10.75	16	1.09		
90009		425170P	FS25 STARTER 1 000 PACK	STARTER	0.0005 microcuries	10000	0	0	0	0		

total starters

855,877

Total microcuries

427.94 microcuries

Question 2

December 17, 2008

Mail Control No. 022721

SLi Lighting Products, Inc.
ATTN: Mr. Kevin J. Bonawitz
122 East Laurel St.
Mullins, SC 29575

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT DISTRIBUTION LICENSE

Dear Mr. Bonawitz:

This refers to your Application for Material License, NRC Form 313, dated September 9, 2008. We do not have sufficient information to complete the review of your application. In order to continue our review we ask that you provide the following additional information:

In order to possess and use byproduct material (i.e., radioactive material such as krypton-85), you must first satisfy the general requirements of 10 CFR 30.33. This regulation in essence requires you to apply for and obtain a specific license authorizing possession and use of radioactive material from the State of South Carolina. Please provide us with a copy of your State of South Carolina Possession and Use license.

If any of the documents you have supplied is intended to meet the requirements of Title 10, Code of Federal Regulations, Part 32, described below, please explain their relevance in your response. You should clearly indicate how any document or portion thereof relates to each of the requirements.

The requirements generally pertain to individual product models. You should indicate in your response whether any of the models are part of a design series, in which case the questions below may be answered for the series rather than the individual models. However, please indicate the models belonging to each series, and explain how they differ.

1) Title 10, Code of Federal Regulations, Section 32.14(b)(1) requires details of the chemical and physical form and maximum quantity of byproduct material in each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. It was noted that in response to Item 5 on NRC Form 313 the number "0.0005," without units, was provided for two product types, while no quantity was provided for other product types. Please provide this information for each model that you would like to distribute. **Attached are addendums A, B and C. This is information given to the NRC group in Phila. as well. It shows the max amount of KR 85 used in each sku.**

2) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. Please provide this information for each model that you would like to distribute. **The items SLi is applying for are a series of HID, compact fluorescent lamps and starters. Attached are representative specifications for these sub product groups.**

3) Title 10, Code of Federal Regulations, Section 32.14(b)(3) requires that the method of containment or binding of the radioactive byproduct material in the product be described. Please provide the method of containment or binding of the radioactive byproduct material in the product. **The products described are lamps which are sealed by press methods or lazars. None of the filler gases can leak out of the lamp unless it is handled inappropriately. (dropped)**

4) Title 10, Code of Federal Regulations, Section 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. Please provide these procedures and describe the prototype testing performed on the product. **See lamp testing procedures in the attachments**

5) Title 10, Code of Federal Regulations, Section 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet. **Same as #4.**

6) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. An attachment (nrc_label.jpg) to your email of November 26, 2008 provided a copy of a label for one model of lamp, but the relationship of this label to any of the several lamp types / models listed in another attachment (nrc metal halide bom 252.rtf) is not clear. Please indicate to which model or series this label applies. If labels for all models / series are substantially the same, this should be clearly indicated in your response. Note: For those products requiring labeling, NRC's policy is that the smallest item distributed must display the required label. If this is not possible, then the label should be placed as close as possible to the product. For example, if an electron tube is too small to label, then the label should be placed on the next smallest container, such as the bubble pack containing the electron tube. **Every lamp inner carton has the KR85 label. We also label the outer carton as well. Attached are samples of the labels.**

7) Title 10, Code of Federal Regulations, Section 32.14(c) requires that each product will contain no more than the quantity of byproduct material specified for that product in '30.15. Please provide the quantity of byproduct material specified for your product. **Same as question #1. See addendum A, B, and C.**

8) Title 10, Code of Federal Regulations, Section 32.14(d)(1) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe how the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. **The items in question are lightbulbs. Lightbulbs are sealed by press and lazar methods so none of the filler gases can release. The KR85 is properly contained and will not release with normal use and handling.**

9) Title 10, Code of Federal Regulations, Section 32.15(a)(1) requires that each person licensed under '32.14 shall maintain quality assurance practices in the manufacture of the

part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. **This is also covered by the attachments in our answers to questions 4 + 5.**

10) Title 10, Code of Federal Regulations, Section 32.15(a)(3) requires that each person licensed under '32.14 shall visually inspect each unit in inspection lots. Any unit that has an observable physical defect that could affect containment of the byproduct material shall be considered as a defective unit. Please describe how you shall visually inspect each unit in inspection lots for defects. **Same as question 9.**

11) Title 10, Code of Federal Regulations, Section 32.15(c) requires that no person licensed under '32.14 shall transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. **I am in charge of R+D and quality for Sylvania in the America's. All defective lamps returned by US cusotomers are reviewed.**

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information. In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Any correspondence regarding your amendment application should reference the control number specified above.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

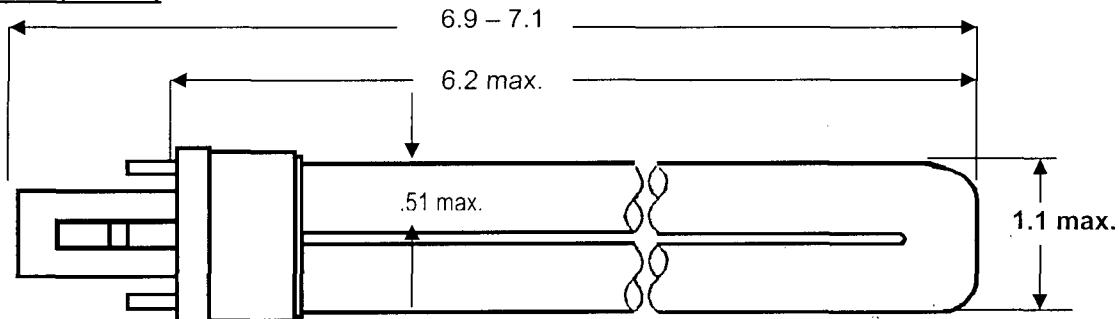


COMPACT FLUORESCENT LAMP

LYNX CFS 13W

DIMENSIONS - (inches)

Nominal dimensions : 7.1 X 1



Cap: GX20

ELECTRICAL DATA

		NOMINAL VALUE	MIN.	MAX.
Frequency	(kHz):	50/60		
Lamp rated wattage	(W):	13.4	12.2	14.6
Lamp operating voltage	(V):	63	57	66
Lamp current	(mA):	270		
Preheat current	(mA):	525		

OPERATING CONDITIONS

Cap rim temperature	(EC):		
Lamp ambient temperature	(EC):		-15
Burning position		any	

PHOTOMETRIC DATA AND PRODUCT NUMBER:

LAMP DESCRIPTION	KELVIN COLOR (K)	CRI	RATED LIFE	INITIAL LUMENS ⁽¹⁾ (LM)	MEAN LUMENS	UPC NAED CODE
CF13LS/827	2700	82	10,000	850	-	5026083
CF13LS/830	3000	82	10,000	850	-	5026283
CF13LS/835	3500	82	10,000	850	-	5026383
CF13LS/841	4100	82	10,000	850	-	5026183
CF13LS/850	5000	82	10,000	850	-	5026483

⁽¹⁾ Initial lumens measured after 100 hours of lamp burning.

Issued by: SLi Lighting
Date: 8/19/03

DATA SHEET

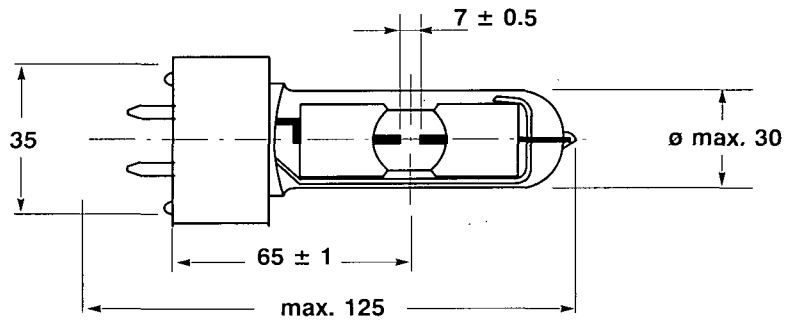
Page 1 of 1

SLi reserves the right to change data and specifications without notice. Data for guidance only.





DIMENSIONS (mm)



Cap : GX 9.5 (IEC 61-1 sheet 7004-70A-1)

Bulb : Quartz glass

ELECTRICAL DATA*:		NOMINAL VALUE	MIN.	MAX.
Lamp wattage	(W) :	575		600
Lamp voltage	(V) :	95	85	105
Lamp current	(A) :	6.95		8

* Magnetic ballast

OPERATING CONDITIONS:

Burning position	:	universal		
Starting voltage peak	(kV) :		2.2	5
Cap rim temperature	(°C) :			350
Bulb temperature	(°C) :			800

LAMP LIFE

Average life	** (h) :	1000		
Replacement time	*** (h) :			1200

** Cycle : 3 hours ON, 1/2 hour off at rated wattage

*** Increasing shattering risk

PHOTOMETRIC DATA** :**

Initial luminous flux	(lm) :	44 000		
Luminous efficacy	(lm/W) :	75		
Correlated colour temperature	(K) :	8500		
CRI	(class) :	2a		
UV output	:	65		

**** Measurement at nominal wattage

ATTENTION : The lamp must be operated in a suitably enclosed fitting.
 Due to the high operating pressure inside the lamp, the possibility exists that in extreme circumstances the lamp might shatter.
 The lamp should not be operated with a broken or damaged outer envelope.
 The lamp generates UV-radiation. Read the safety instructions packed with the lamp.

Issued by : TIENEN
 Date : 19.02.2001
 Revision date : 20.08.2001

DATA SHEET

Specification No. : 44-60-577/B
 Supersedes : 44-60-577/A 06.06.2001
 Page 1 of 1

SYLVANIA
TIENEN

SPEC. NR.: 44 M 1900-252/V
DATE : 26.01.2001
REV. DATE : 04.07.2007
PAGE 1 FROM 4 PAGE(S)

SUBJECT : MATERIALLIST BA 250/2 SE D 8.5 en BA 250 SE D

I. LAMPMAKING

ELD-codes : 0023998, 0023999, 7223999, 7023853, 7220169, 7223993, 7023857, 7023806, 7023808

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
899400	Quartz tube (OJ) 22.5 x 1.00 x 161 mm	44A-0104-009	500 st
811038	Quartz tube (OJ) 5 x 1 x 80 mm	43A-0104-001	1000 st
879710	Quartz bulb 150 - 400	44A-0101-002	1000 st
878538	Quartz tube (AT) 4 x 1 x 80 mm	44A-0104-009	1000 st
990492	Argon-Krypton ⁸⁵	44A-1100-001	
899407	Wandelstok 250W	44A-0323-025	1000 st
032108	Mo Wire (OJ) 0.6 mm	51A-0301-076	43.6 m
941013	Mo Foil (OJ) 3.0 x 0.025 mm	51A-0302-032	18 m
899532	Base GY9.5	44A-1300-079	1000 st
879403	Cement Caulcrete	44A-1305-007	10 kg
897116	Getter ST101	45A-0901-101	1000 st
896720	Kovar (dikte 0.1 mm)	45A-0324-002	1 x 3 mm
896590	Ta ribbon	43A-0302-004	4 m
866015	Foil lead 250/2	44A-1300-001	2000 st

II. SPECIFIC

A. BA 250/2 SE D 8.5

ELD-codes : 0023998, 0023999, 7223999, 7023853, 7023830, 7023808

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
882457	Mercury triple distilled	45A-1110-001	0.036 kg
898781	Dy ₃ GdBr ₃ Csl pellets (1mg)	44A-1103-002	1000 kg
898771	Hg Br ₂ pellets (0.5mg)	44A-1107-001	1000 kg

B. BA 250 SE D

ELD-codes : 7220169, 7223993, 7023857, 7023806

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
882457	Mercury triple distilled	45A-1110-001	0.036 kg
898775	4 comp. Ho ₃ Dy ₃ Tm ₃ Csl pellets (1.5mg)	44A-1103-003	1.5 x 10 ⁻³ kg
898769	Hg Br ₂ pellets (1mg)	44A-1107-001	1 x 10 ⁻³ kg

III. LAMPSTAMPING

A. BA 250/2 SE D 8.5

ELD-code : 0023998, 0023999

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
899403	Stempelplaat BA 250/2 SE D	44A-1901-013	

ELD-code : 7223999

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
878551	Stempelplaat	44A-1901-013	
865275	Stempelplaat Hg logo	44A-1901-017	

ISSUED BY : WOUTER WINANT

SYLVANIA
TIENEN

SPEC. NR.: 44 M 1900-252/V
DATE : 26.01.2001
REV. DATE : 04.07.2007
PAGE 2 FROM 4 PAGE(S)

SUBJECT : MATERIALLIST BA 250/2 SE D 8.5 en BA 250 SE D

ELD-code : 7023853

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
878938	Stempelplaat USD 250/2 NHR	44A-1901-013	

ELD-code : 7023830

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
878951	Stempelplaat USD 250/2 NHR	44A-1901-013	

ELD-code : 7023808

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
877062	Stempelplaat ESD 250/2 SE D 8.5 EIKO	44A-1901-008	
865275	Stempelplaat Hg logo	44A-1901-017	

ELD-code : 7223910

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
865420	Stempelplaat Omnilux 250/2	44A-1901-020	

B. BA 250 SE D

ELD-code : 7220169

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
878345	Stempelplaat	44A-1901-013	

ELD-code : 7223993

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
878501	Stempelplaat	44A-1901-008	
865275	Stempelplaat Hg logo	44A-1901-017	

ELD-code : 7023857

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
878863	Stempelplaat USD 250	44A-1901-013	

ELD-code : 7023806

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
877060	Stempelplaat ESD 250 SE D EIKO	44A-1901-008	
865275	Stempelplaat Hg logo	44A-1901-017	

IV. PACKING

Packing EU-market : 0023998, 7220169, 0023999

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
877410	Insert 65	44A-1903-399	1000 st
869909	Outer carton	44A-1902-400	100 st
877100	Warning label	44A-1914-003	1000 st
876342	Zelfklevend etiket 105 x 74	43A-1914-002	100 st

ELD-code : 0023998, 0023999

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
869905	Sleeve Sylvania BA 250/2	44A-1903-002	1000 st

ELD-code : 7220169

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
869901	Sleeve Sylvania Entertainment	44A-1903-002	1000 st

ISSUED BY : WOUTER WINANT

SYLVANIA
TIENEN

SPEC. NR.: 44 M 1900-252/V
DATE : 26.01.2001
REV. DATE : 04.07.2007
PAGE 3 FROM 4 PAGE(S)

SUBJECT : MATERIALLIST BA 250/2 SE D 8.5 en BA 250 SE D

877349	Zelfklevend etiket 100 x 36	43A-1914-002	1000 st
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Packing US-market : 7223993, 7223999

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
869902	Sleeve Sylvania entertainment	44A-1903-002	1000 st
877410	Insert 65	44A-1903-399	1000 st
869909	Outer carton	44A-1902-400	100 st
877100	Warning label	44A-1914-003	1000 st
877349	Zelfklevend etiket 100 x 36	43A-1914-002	1000 st
876342	Zelfklevend etiket 105 x 74	43A-1914-002	100 st

Packing USHIO : 7023857, 7023853

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
869800	Sleeve blanco	44A-1903-401	1000 st
877410	Insert 65	44A-1903-399	1000 st
869909	Outer carton	44A-1902-400	100 st
877347	Zelfklevend etiket 65 x 44	43A-1914-002	1000 st
876334	Zelfklevend etiket 147 x 105	43A-1914-002	100 st

Packing CSD : 7023830

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
877409	Sleeve GE	44A-1903-504	1000 st
877410	Insert 65	44A-1903-399	1000 st
869909	Outer carton	44A-1902-400	100 st
877101	Warning label CSD	44A-1914-002	1000 st
876334	Zelfklevend etiket 147 x 105	43A-1914-002	100 st

Packing EIKO : 7023808, 7023806

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
869906	Sleeve EIKO 170 x 45 x 45 mm	44A-1903-004	1000 st
877410	Insert 65	44A-1903-399	1000 st
869909	Outer carton	44A-1902-400	100 st
877099	Warning label BA EIKO	44A-1914-006	1000 st
876342	Zelfklevend etiket 105 x 74	43A-1914-002	100 st
877349	Zelfklevend etiket 100 x 36	43A-1914-002	1000 st

Packing OMNILUX : 7223910

ITEMNR.	DESCRIPTION	SPECNBR.	QTY / 1000
870080	Sleeve Omnilux 250/2		1000 st
877410	Insert 65	44A-1903-399	1000 st
869909	Outer carton	44A-1902-400	100 st
877100	Warning label	44A-1914-003	1000 st
876342	Zelfklevend etiket 105 x 74	43A-1914-002	100 st

ISSUED BY : WOUTER WINANT

SUBJECT : MATERIALLIST BA 250/2 SE D 8.5 en BA 250 SE D

VII. REVISION DESCRIPTIONS

- A. 07.03.2001 Itemnr. Electrode gewijzigd
- B. 05.07.2001 905662 ipv 905605 en spec. 899403 aangepast
- C. 13.12.2001 USHIO verpakking toegevoegd
- D. 01.02.2002 898781 toegevoegd + 899701 en 899404 vervallen
- E. 12.07.2002 Verpakking CSD toegevoegd
- F. 03.09.2002 899404 ipv 896905 en 943168 vervallen
- G. 22.11.2002 877410 ipv 877407 en 905662 vervallen
- H. 22.01.2003 878787 ipv 878777 en 899407 ipv 878249
- I. 10.12.2003 Code 7023830 toegevoegd
- J. 12.02.2004 878827 ipv 878855
- K. 15.10.2004 869905 ipv 877349 vervallen voor CSD
- L. 14.03.2005 865275 toegevoegd; 878538 ipv 898769 en 941013 ipv 930102
- M. 18.08.2005 Ta ribbon ipv Pt Plated Mo tape
- N. 09.02.2006 879710 ipv 878787 en 878827 vervallen
- O. 12.04.2006 Spec. Volledig aangepast
- P. 26.06.2006 878787 + 878827 toegevoegd + spec omgezet naar Word
- Q. 17.08.2006 941013 wordt vervangen door 812128
- R. 11.10.2006 0023999 bijgevoegd
- S. 04.12.2006 878787 + 878827 expired, 879710 added
- T. 13.03.2007 866015 added, 899402, 812128 and 878314 expired
- U. 15.05.2007 Changed packing and stamping 0023999
- V. 04.07.2007 Added OMNILUX brand (stamping and packing), 7223910

I. INSPECTION SAMPLE

Sample shall be taken according to MIL-STD-105E, double sampling plan for normal inspection.

II. INSPECTION

Test No. 1: UV-Enhancer should spark as a low pressure mercury discharge vessel with tesla coil (Vital Defects, AQL: 0.4).

Test No. 2: (Vital Defect, AQL: 0.4)

- A) Connect the UV-Enhancer to a circuit according to the Figure No. 1 on page 3.
- B) The UV-Glowbottle must be 2" far from the UV photocell.
- C) Supply 230-240 VAC - 50 Hz to the UV photocell.
- D) A 9 VDC power supply should be connected to the optoisolator device.
- E) Apply 3 KV to the UV-Glowbottle electrode.
- F) The UV photocell detects the UV discharge and the red LED shall flashe indicating UV-Glowbottle operation.

Test No. 3: Visual Inspection (Major Defects, AQL: 1.0).

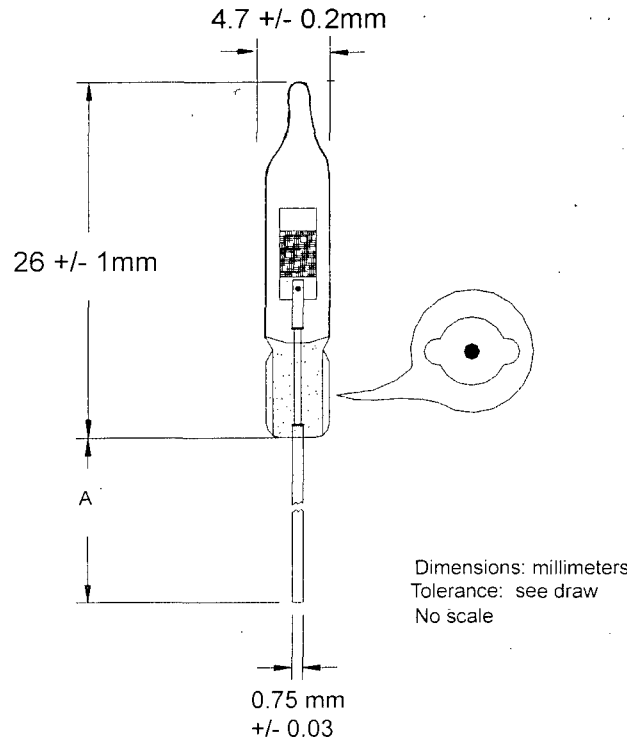
- Broken Lead Wire.
- Broken or Bent Tip.
- Bent lead.
- Oxidation on the getter.

**PRODUCT TECHNICAL SPECIFICATION
FOR INTERNAL USE ONLY**

GB-UV (PHILIPS) GLOWBOTTLE

III. DIMENSIONS

Inspection Level: S-4, AQL: 1.0



PRODUCT	SYLVANIA CODE	A DIMENSIONS
GB-UV	004835000	36 +/- 1
GB-UV-S	004836000	17 +/- 0.5
GB-UV-M	004837000	19 +/- 0.75

IV. PACKAGING

- UV-Enhancer should be placed in clear plastic bags.
- Material should be packed in cardboard boxes of 1000 units.

V. UV DETECTION CIRCUIT FOR TEST No. 2

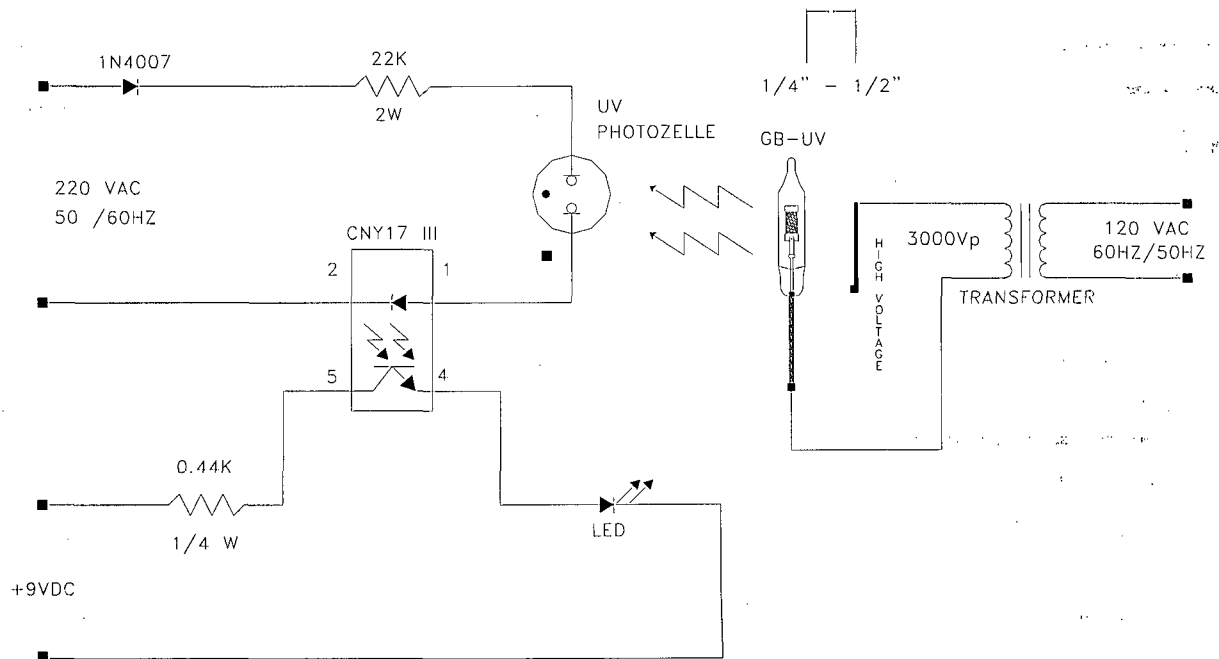
Sylvania S.A. - Costa Rica
Date: 02/20/2002
Revision Date: 04/25/2003

SYLVANIA

Specification No.: CFBI-09-A3
Supersedes: CFBI-09-A2
Page 2 of 3

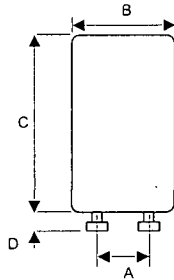
FIGURE No. 1

UV TEST CIRCUIT



SYLVANIA	Document: FLUORESCENT LAMP STARTERS FS-12	Sheet: 1/1
	Document code: DS-29	Department: QUALITY

DIMENSIONS (in mm)

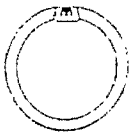


Dimension	Min.	Max.
A	12.5	12.9
B	-	21.5
C	33.0	36.0
D	-	4.3

RECOMMENDATION FOR APPLICATION

Rated voltage: 110 - 130V Single (*)
 Operating mode: Single
 Ambient temperature: -20 °C min.
 Temperature in any part of starter: 100°C max.
 Circuit: Lag / Lead

Lamp type:



Circline: 32W

(*) Auto transformer ballast

ATTENTION: The FS-12 complies with ANSI C78.180
 Lamps used with FS-12 must comply with ANSI C78.2C and C78.3
 Ballasts used with FS-12 must comply with ANSI C82.1

Prepared by: I. Lohrengel	Approval: Ingrid Lohrengel	<i>SYLVANIA</i> Digitally signed by Ingrid Lohrengel	Revision date: 31/08/2004
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SYLVANIA reserves the right to change data sheet without notice.
 Data for guidance only.

I. ELECTRICAL DATA

Lamp preheat current: 675 mA max.
 Rated voltage: 115-130 VAC

II. PERFORMANCE PARAMETERS

Code	Parameter	Test Spec.	Test Requirements	Level	AQL
QA01	Speed of Operation	IEC-155 Clause 8.4	Contacts shall open 7 times within 25 s. (105 V).	II	1.0
QA02	Non-Reclosure Voltage	IEC-155 Clause 8.6	80 V minimum (1 minute)	II	1.0
QA03	Start Time	Time elapsed between switch-on and lamp start.	10 sec. max. 108V	II	1.0

III. APPLICATION

Lamp Type	32W T-9 32W T-10	Circuit: Max. Operating temperature:	Circline 100°C
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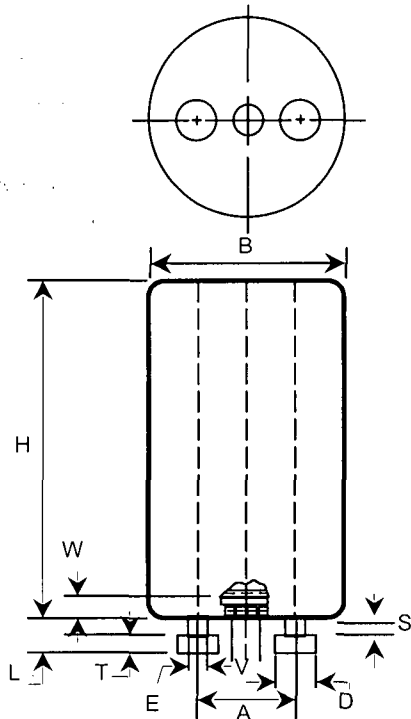
Sylvania S.A. - Costa Rica
 Date: 03/23/95
 Revision Date:

SYLVANIA

Specification No.: CFAE-08
 Supersedes: NEW
 Page 1 of 2

IV. DIMENSIONS (CODE QA-13)

Inspection Level: S-4; AQL: 2.5



Dimensions	Min.	Max.
A	12.5	12.9
B	-	21.5
D	4.7	5.0
E	2.8	3.2
H	33.0	36.0
L	-	4.3
S	1.7	-
T	1.9	2.2
V	2.7	-
W*	4.2	-

* Distance valid for dimension V
 Dimensions in millimeters
 No scale

Plastic (polycarbonate) can starter

Sylvania S.A. - Costa Rica
 Date: 03/23/95
 Revision Date:

SYLVANIA

Specification No.: CFAE-08
 Supersedes: NEW
 Page 2 of 2

Question 3

December 17, 2008

Mail Control No. 022721

SLi Lighting Products, Inc.
ATTN: Mr. Kevin J. Bonawitz
122 East Laurel St.
Mullins, SC 29575

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT DISTRIBUTION LICENSE

Dear Mr. Bonawitz:

This refers to your Application for Material License, NRC Form 313, dated September 9, 2008. We do not have sufficient information to complete the review of your application. In order to continue our review we ask that you provide the following additional information:

In order to possess and use byproduct material (i.e., radioactive material such as krypton-85), you must first satisfy the general requirements of 10 CFR 30.33. This regulation in essence requires you to apply for and obtain a specific license authorizing possession and use of radioactive material from the State of South Carolina. Please provide us with a copy of your State of South Carolina Possession and Use license.

If any of the documents you have supplied is intended to meet the requirements of Title 10, Code of Federal Regulations, Part 32, described below, please explain their relevance in your response. You should clearly indicate how any document or portion thereof relates to each of the requirements.

The requirements generally pertain to individual product models. You should indicate in your response whether any of the models are part of a design series, in which case the questions below may be answered for the series rather than the individual models. However, please indicate the models belonging to each series, and explain how they differ.

1) Title 10, Code of Federal Regulations, Section 32.14(b)(1) requires details of the chemical and physical form and maximum quantity of byproduct material in each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. It was noted that in response to Item 5 on NRC Form 313 the number "0.0005," without units, was provided for two product types, while no quantity was provided for other product types. Please provide this information for each model that you would like to distribute. Attached are addendums A, B and C. This is information given to the NRC group in Phila. as well. It shows the max amount of KR 85 used in each sku.

2) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. Please provide this information for each model that you would like to distribute. The items SLi is applying for are a series of HID, compact fluorescent lamps and starters. Attached are representative specifications for these sub product groups.

3) Title 10, Code of Federal Regulations, Section 32.14(b)(3) requires that the method of containment or binding of the radioactive byproduct material in the product be described. Please provide the method of containment or binding of the radioactive byproduct material in the product. The products described are lamps which are sealed by press methods or lazars. Some of the filler gases can leak out of the lamp unless it is handled inappropriately. (dropped)

4) Title 10, Code of Federal Regulations, Section 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. Please provide these procedures and describe the prototype testing performed on the product. See lamp testing procedures in the attachments

5) Title 10, Code of Federal Regulations, Section 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet. Same as #4.

6) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. An attachment (nrc_label.jpg) to your email of November 26, 2008 provided a copy of a label for one model of lamp, but the relationship of this label to any of the several lamp types / models listed in another attachment (nrc metal halide bom 252.rtf) is not clear. Please indicate to which model or series this label applies. If labels for all models / series are substantially the same, this should be clearly indicated in your response. Note: For those products requiring labeling, NRC's policy is that the smallest item distributed must display the required label. If this is not possible, then the label should be placed as close as possible to the product. For example, if an electron tube is too small to label, then the label should be placed on the next smallest container, such as the bubble pack containing the electron tube. Every lamp inner carton has the KR85 label. We also label the outer carton as well. Attached are samples of the labels.

7) Title 10, Code of Federal Regulations, Section 32.14(c) requires that each product will contain no more than the quantity of byproduct material specified for that product in '30.15. Please provide the quantity of byproduct material specified for your product. Same as question #1. See addendum A, B, and C.

8) Title 10, Code of Federal Regulations, Section 32.14(d)(1) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe how the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. The items in question are lightbulbs. Lightbulbs are sealed by press and lazars methods so none of the filler gases can release. The KR85 is properly contained and will not release with normal use and handling.

9) Title 10, Code of Federal Regulations, Section 32.15(a)(1) requires that each person licensed under '32.14 shall maintain quality assurance practices in the manufacture of the

part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. This is also covered by the attachments in our answers to questions 4 + 5.

10) Title 10, Code of Federal Regulations, Section 32.15(a)(3) requires that each person licensed under '32.14 shall visually inspect each unit in inspection lots. Any unit that has an observable physical defect that could affect containment of the byproduct material shall be considered as a defective unit. Please describe how you shall visually inspect each unit in inspection lots for defects. Same as question 9.

11) Title 10, Code of Federal Regulations, Section 32.15(c) requires that no person licensed under '32.14 shall transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. I am in charge of R+D and quality for Sylvania in the America's. All defective lamps returned by US customers are reviewed.

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information. In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Any correspondence regarding your amendment application should reference the control number specified above.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

Q08210-4+5+9+10

December 17, 2008

Mail Control No. 022721

SLi Lighting Products, Inc.
ATTN: Mr. Kevin J. Bonawitz
122 East Laurel St.
Mullins, SC 29575

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT DISTRIBUTION LICENSE

Dear Mr. Bonawitz:

This refers to your Application for Material License, NRC Form 313, dated September 9, 2008. We do not have sufficient information to complete the review of your application. In order to continue our review we ask that you provide the following additional information:

In order to possess and use byproduct material (i.e., radioactive material such as krypton-85), you must first satisfy the general requirements of 10 CFR 30.33. This regulation in essence requires you to apply for and obtain a specific license authorizing possession and use of radioactive material from the State of South Carolina. Please provide us with a copy of your State of South Carolina Possession and Use license.

If any of the documents you have supplied is intended to meet the requirements of Title 10, Code of Federal Regulations, Part 32, described below, please explain their relevance in your response. You should clearly indicate how any document or portion thereof relates to each of the requirements.

The requirements generally pertain to individual product models. You should indicate in your response whether any of the models are part of a design series, in which case the questions below may be answered for the series rather than the individual models. However, please indicate the models belonging to each series, and explain how they differ.

1) Title 10, Code of Federal Regulations, Section 32.14(b)(1) requires details of the chemical and physical form and maximum quantity of byproduct material in each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. It was noted that in response to Item 5 on NRC Form 313 the number "0.0005," without units, was provided for two product types, while no quantity was provided for other product types. Please provide this information for each model that you would like to distribute. **Attached are addendums A, B and C. This is information given to the NRC group in Phila. as well. It shows the max amount of KR 85 used in each sku.**

2) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. Please provide this information for each model that you would like to distribute. **The items SLi is applying for are a series of HID, compact fluorescent lamps and starters. Attached are representative specifications for these sub product groups.**

3) Title 10, Code of Federal Regulations, Section 32.14(b)(3) requires that the method of containment or binding of the radioactive byproduct material in the product be described. Please provide the method of containment or binding of the radioactive byproduct material in the product. **The products described are lamps which are sealed by press methods or lazars. None of the filler gases can leak out of the lamp unless it is handled inappropriately. (dropped)**

4) Title 10, Code of Federal Regulations, Section 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. Please provide these procedures and describe the prototype testing performed on the product. **See lamp testing procedures in the attachments**

5) Title 10, Code of Federal Regulations, Section 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet. **Same as #4.**

6) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. An attachment (nrc_label.jpg) to your email of November 26, 2008 provided a copy of a label for one model of lamp, but the relationship of this label to any of the several lamp types / models listed in another attachment (nrc metal halide bom 252.rtf) is not clear. Please indicate to which model or series this label applies. If labels for all models / series are substantially the same, this should be clearly indicated in your response. Note: For those products requiring labeling, NRC's policy is that the smallest item distributed must display the required label. If this is not possible, then the label should be placed as close as possible to the product. For example, if an electron tube is too small to label, then the label should be placed on the next smallest container, such as the bubble pack containing the electron tube. **Every lamp inner carton has the KR85 label. We also label the outer carton as well. Attached are samples of the labels.**

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9) Title 10, Code of Federal Regulations, Section 32.15(a)(1) requires that each person licensed under '32.14 shall maintain quality assurance practices in the manufacture of the

part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. **This is also covered by the attachments in our answers to questions 4 + 5.**

10) Title 10, Code of Federal Regulations, Section 32.15(a)(3) requires that each person licensed under '32.14 shall visually inspect each unit in inspection lots. Any unit that has an observable physical defect that could affect containment of the byproduct material shall be considered as a defective unit. Please describe how you shall visually inspect each unit in inspection lots for defects. **Same as question 9.**

11) Title 10, Code of Federal Regulations, Section 32.15(c) requires that no person licensed under '32.14 shall transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. **I am in charge of R+D and quality for Sylvania in the America's. All defective lamps returned by US cusotomers are reviewed.**

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information. In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Any correspondence regarding your amendment application should reference the control number specified above.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

ST-1005

SYLVANIA
Have It Sylvania

Q.A. PRODUCT ACCEPTANCE CHECK

Product Description: 13... 835 DE/10125945

Prod. Ticket No. 47353

MONTH: OCTOBER LINE: BECKMEN SHIFT: 2nd WEEK No.: 42

DATE: <u>10-15-08</u>						After Line Quality ONLY					
Time	Box numbers	SAMPLE SIZE =				DECISION ACCEPT / REJECT	LINE SIGN OFF	H.F. COIL	PASS	HOLD	QA SIGNATURE
		Critical	Vital	Major	Minor						
<u>19:15</u>	<u>1, 2, 3, 4, 5, 15, 16, 17, 18</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>a</u>	<u>Kazi</u>				
<u>20:20</u>	<u>17, 18, 19, 20</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>—</u>	<u>a</u>	<u>Kazi</u>				
3											
4											
5											
6											
7											
8											
9											
10											

COLLECTIONS: ALL THESE... ON RE-INSPECTION PLEASE NOTE INSTRUCTIONS OVERLEAF

Colling Sample Sizes

Batch	up to 3200	3201 to 10000	10001 to 35000
Sample	200	500	1000
Accept		3	5
Reject		4	6

24-HOUR COILING RESULTS

2000

Pallet quantity: 2100 Signature: [Signature]

1. GENERAL CONDITIONS

- These QUALITY REQUIREMENTS apply to starters and define the warranty given by the supplier.
- The supplier warrants the starters delivered to be in compliance with the QUALITY AND SAFETY REQUIREMENTS, as defined in section 3.
- For quality approval of a starter shipment, an inspection may be performed by the recipient, based on sampling plans according to the QUALITY AND SAFETY REQUIREMENTS in section 3. of these QUALITY REQUIREMENTS.

2. CONDITIONS OF ACCEPTANCE AND REJECTION

- Lots inspected in accordance with this specification and found to comply with the requirements shall be accepted. Lots which do not comply may be rejected.
- In case of a rejection, the recipient shall communicate the results of the inspection, as well as manufacturing date, lot number and product description of the rejected material immediately to the supplier.
- The supplier will determine the further treatment of a rejected lot and instruct the recipient, accordingly.
- Changes or amendments to this specification become only valid after these have been mutually agreed upon in writing.

3. QUALITY AND SAFETY REQUIREMENTS**3.1 DEFINITION OF TERMS.**

- Inspection lot is the quantity of products from which a sample is to be draw and inspected to determine conformance with the acceptability criteria. It consists of starters of a single type.
- Test quantity is the number of individual glowbottles to be tested to determine conformance with the acceptability criteria.
- Test unit is one starters.
- Defect is a non-conformity of an inspected unit with the respective quality specification.
- Defective unit is a starters which contains one or more defects, or a box or a label with faulty information.

3.2 DEFINITION OF DEFECTS**3.2.1 QUALITATIVE DEFECTS**

May be identified by visual inspection without extensive test equipment.

3.2.1.1 CRITICAL DEFECTS (CODE CA-..)

Are likely to result in unsafe conditions for individuals using or maintaining the product, or to be seriously detrimental to commercial interest.

CODE

CA-01 ALIEN BRAND

On starter housing, box or label.

CA-02 SHORT CIRCUIT (STARTER WITH METAL CAN)

Insulation resistance between pins and metal can 500 K-ohm, test voltage: 500 VDC.

CA-03 LOOSE BASE

Base disassembles from the starter can during insertion or removal from the starter holder.

CA-04 BURNED ENCLOSURE/MELTED

Glowbottle overheats melting the plastic enclosure.

CA-05 LOOSE BIMETAL

The bimetal in the glowbottle is not welded to the electrode leaving the starter inoperative or causing burn-out.

CA-06 OTHER CRITICAL

Any other critical defect that is not mentioned in this list.

3.2.1.2 VITAL DEFECTS (CODE VA-..)

Sylvania S.A. - Costa Rica
Date: 11/17/93
Revision Date: 10/27/2008

SYLVANIA

Specification No.: CFAE-00B
Supersedes: CFAE-00A
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Render a product inoperative or otherwise useless.

CODE**VA-01 MISSING PRODUCT.**

Quality of product is less than specified on packing unit.

VA-02 MIXED PRODUCT

Two or more starter types in the same box.

VA-03 WRONG ETCH OR LABEL

Type designation on can or label missing or wrong.

VA-04 LOOSE PINS

Before or after insertion into starter holder or gauge.

VA-05 BUTTON DEFECT (COP ONLY)

Missing button, or released button as received.

VA-06 INOPERATIVE.

Glowbottle without gas or inner not crimped to base. Lamp does not start.

VA-07 SHORT CIRCUITIT (GB. COND.)

Bimetal is soldered to the opposite electrode or the electrodes of the glowbottle are making contact between them.

VA-08 POOR SOLDER

Electrodes are not properly soldered to the pins.

VA-09 PERFORATED CONDENSER

Mylar tape on the condenser it's perforated.

VA-10 ELECTRODE OUT

Starter with a glowbottle electrode out of the pin base, not permitting electrical contact and leaving the starter inoperative.

VA-11 VITAL BROKEN TIP

Glowbottle tip is broken provoking gas leakage and making the product inoperative.

VA-12 CRACKED GLOWBOTTLE

Breaking through which the gas on the glowbottle leaks.

VA-13 BROKEN BEAD

Broken piece of the glass bead is loose inside the glowbottle.

VA-14 TEST (CONDENSER)

Starter that requires a condenser and doesn't have one.

VA-15 BROKEN ELECTRODE

Electrode that brakes on the knots; the starter becomes inoperative.

VA-16 BURNED/DAMAGED ELECTRODE

Glowbottle with burned or damaged electrodes; the starter becomes inoperative.

VA-17 NO GAS

Gas leak in the glowbottle caused by glass fracture; the starter becomes inoperative.

VA-18 BAD AGING

Glowbottle with incomplete aging cycle becomes unstable, this prevents the starter from igniting the fluorescent lamp.

VA-19 NO SEAL

A Glowbottle without seal has a poor subjection of the electrodes, facilitates the gas leakage and leaves the starter inoperative.

VA-20 DEFECTIVE BEAD

Deformed, high, low or bent bead towards the walls of the glowbottle; the starter becomes inoperative.

VA-21 OTHER VITAL

Any other vital defect that is not mentioned in this list.

3.2.1.3 MAJOR DEFECTS (Código MA-..)

Reduce materially the usability of the product or constitute a severe appearance defects.

CODE**MA-01 BROKEN ENCLOSURE**

Starter enclosure with complete or partial burst anywhere on it's surface, giving access to internal electrical components. Also considered as a product appearance defect, visible to the client.

MA-02 ARCING

Electric discharge between electrodes.

MA-03 GLOW CURRENT

Incandescent glowbottle with rms current $\geq 5\text{mA}$ after lamp starting, that causes blinking in the intensity of the fluorescent lamp (flickering).

MA-04 BROKEN BASE

Base of the starter with fracture or burst visible to the client. Not yet coming off the enclosure but it is weak.

MA-05 LOOSE PIN

Pin of the starter base not well riveted to the base and is prone to become loose.

MA-06 OTHER MAYOR

Any other major defect than is not mentioned in this list.

3.2.1.4 MINOR DEFECTS (CODE NA-..)

Constitute a departure from the expected visual appearance of the product.

CODE**NA-01 ILLEGIBLE ETCH/LABEL**

Etch or label partially illegible, or in any way indistinct.

NA-02 DIRTY STARTER

Foreign material on can such as ink or grease spots.

NA-03 POOR ASSEMBLY

Starter base is poorly assembled, but does not separate from can.

NA-04 DEFORMED OR DAMAGED CAN

Metal can does not have its original shape.

NA-05 ELECTRODE OUT

Starter with electrode, from the glowbottle or the capacitor, out of the pin base.

NA-06 DISALIGNED BASE

The base of the starter is not aligned with the ribs of the starter enclosure.

NA-07 BURNED BASE

Starter base exposed to overheat and shows burns.

NA-08 BAD SOLDERING

Starter component has an opaque, not uniform or poor solder joint.

NA-09 STOPPED EARS

The fins of the aluminum jar do not bend to hold the base.

NA-10 LOOSE MATERIAL (TO INNER)

Starter with loose internal component.

NA-11 ENCLOSURE WITH HOLE

Starter enclosure with a hole on the top in a batch of starters without hole.

NA-12 ENCLOSURE WITHOUT HOLE

Starter enclosure without a hole on the top in a batch of starters with hole.

NA-13 OTHER MINORS

Any other minor defect than is not mentioned in this list.

3.2.2 QUANTITATIVE DEFECTS

Are a failure to comply with measurable, quantitative products performance and safety parameters which are numerically defined

3.2.2.1 QUANTITATIVE DEFECTS (CODE QA-..)

See respective Product Technical Specification (code CFAE-..) for parameter values.

3.3 SAMPLING PLAN

Quality assessment is based on inspection of a sample which is drawn at random from an inspection lot (see section 3).

Sylvania S.A. - Costa Rica
Date: 11/17/93
Revision Date: 10/27/2008

SYLVANIA

Specification No.: CFAE-00B
Supersedes: CFAE-00A
Page 7 of 8

The sample size and acceptability of a lot determined by the use of a double sampling plan in accordance with ANSI/ASQ Z1.4-2003 / IEC Publication 410 associated with the designated inspection levels and AQLs.

3.4 ACCEPTABLE QUALITY LEVEL (AQL)**3.4.1 QUALITATIVE DEFECTS**

DEFECTS CLASS	CODE	INSPECTION LEVEL	AQL
Critical	CA-	II	*
Vital	VA-	II	0.65
Mayor	MA-	II	1.0
Minor	NA-	II	4.0

* One or more defects lead to rejection of the whole inspection lot.

3.4.2 QUANTITATIVE DEFECTS

See respective Product Technical Specification (code CFAE-..) for inspection level and AQL definition.

COMPACT FLOORJOIST

CA PRODUCT ACCEPTANCE CONTROL												
REPORT MONTH		UNIT	SHEETS					WEEK NO				
Oct		CFD	2					42				
PROD. DATE	TYPE	INSPECTION	DETAIL					QTY	HOLD-OUT REASON	QTY	QTY	
Lot		Sample C	U	L	AV							
Per further details see H&S-04-01	up to 3200	50	0	0	1	3	- ACCEPT	200	2	- ACCEPT		
		50	1	1	2	4	- HOLD	200	3	- HOLD		
	3201 to 19200	30	0	1	2	5	- ACCEPT	500	3	- ACCEPT		
		30	1	2	3	5	- HOLD	500	4	- HOLD		
	19201 to 36000	125	0	1	3	7	- ACCEPT	1000	3	- ACCEPT		
		125	1	2	4	8	- HOLD	1000	3	- HOLD		
13-10-08	CFD 18W 820 84L	80						350		None	8	
16-10-08	CFIDe 13W-835 + 13W-827 + 13W-840	125						600	1 B K E R	None	8	
TOTAL												
A09												
COMMENTS												

SUBJECT: Quality and Safety Requirements for BriteArc Family

QUALITY SPECIFICATION FOR

BriteArc family

AID

List of contents

- A. Quality specification for lamps
- B. Classification of Defects
- C. Acceptable Quality Level (AQL)

A 02.06.1992	Specnbr. droptest (p11) is 99E..... i.s.o. 45 E.....	E 29.05.1998	P28 added
B 08.10.1993	page 7 and 9 adjusted	F 29.10.1998	Page 6 : I15 added
C 08.10.1996	Update of defects, replace IEC410 with ISO2859	G 13.09.2001	Page 12 : table adjusted + *exception added
D 10.04.1998	Page 6 added and page 8 : P26 and P27 added	H 24.10.2002	P29 added

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

DISTRIBUTION: PRO OPG OPM S&H LABO PURCH QC ENG
1 1 i-net 0 0 0 1 1

SUBJECT: Quality and Safety Requirements for BriteArc Family

1. QUALITY SPECIFICATION FOR LAMPS

A. GENERAL

- A.1 This specification applies to lamp types as outlined in the attached QUALITY AND SAFETY REQUIREMENTS and describes the warranty given by SLI SYLVANIA or its subsidiaries, further referred to as "supplier".
- A.2 The supplier warrants the lamps delivered to be in compliance with the individual QUALITY AND SAFETY REQUIREMENTS.
- A.3 For approval of lamp quality an inspection may be performed by the recipient in accordance with ISO 2859, inspection level II, if not specified otherwise.

B. DEFINITION OF TERMS

- B.1 Inspection lot
means a collection of units of lamps from which a sample is to be drawn and inspected to determine conformance with the acceptability criteria.
It usually consists of lamps of a single type, wattage or style, but may be differ from lots designated for other purposes (production, shipments, etc.).
- B.2 Test quantity
is the number of individual lamps to be tested to determine conformance with the acceptability criteria.
- B.3 Test unit
is one lamp to be tested.
- B.4 Defective unit
is a lamp which contains one or more defects.
- B.5 Defect
is a non-conformity of an inspected unit with the product and/or quality specifications.

C. CLASSIFICATION OF DEFECTS

- C.1 Attributive Defects
Are grouped into the following classes or sub-classes according to their seriousness:

- a. Critical defect: Code
C
Is likely to result in hazardous or unsafe conditions for individuals using, maintaining or depending upon the product or to be seriously detrimental to commercial interest.
- b. Vital Defect:
Renders a product inoperative or otherwise useless.

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

DISTRIBUTION: PRO 1 OPG 1 OPM i-net S&H 0 LABO 0 PURCH 0 QC 1 ENG 1

SUBJECT: Quality and Safety Requirements for BriteArc Family

- c. Major Defect: P
Reduces materially the usability of the product, or a severe appearance defect.
- d. Minor Defect: M
Is not likely to reduce materially the usability of the unit of product for its intended purpose but is a departure from established standards having little bearing on the effective use or operation of the unit product.

C.2 Quantitative Defects Q
Is a failure to comply with quantitative product parameters as indicated in the respective lamp specification and tested on units which have passed inspection tests on all qualitative defect classes (C, I, P and M).

D. ACCEPTANCE/REJECTION CRITERIA

- D.1 Lots inspected in accordance with this specification and found to comply with the requirements shall be accepted. In case of non-conformance the recipient is authorized to file a complaint with the supplier.
- D.2 To support a complaint the recipient shall render the technical data of the inspection, as well as the fabrication codes of the unit product and/or box to the supplier. Defective units found shall be kept and made available to the supplier upon request.
- D.3 The recipient shall, upon request, authorize the supplier to reinspect a lot which has been subject to complaint.
- D.4 Defectives found in the sample of an accepted lot shall neither be replaced, repaired nor credited by the supplier.
- D.5 Rejection of a lot can only be based on such defects, which are defined in the respective product/quality specifications.
- D.6 Changes or amendments to this specification are not valid until mutually agreed upon in writing by both parties concerned.

ISSUED BY : G. Verweken / K.Desmedt
APPROVED BY : F. Hansen
DISTRIBUTION: PRO 1 OPG 1 OPM i-net LABO 0 S&H 0 PURCH 0 QC 1 ENG 1

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

SUBJECT: Quality and Safety Requirements for BriteArc Family

2. Classification of Defects
2.1. CRITICAL DEFECTS

<u>Code</u>	<u>Defect Description</u>
C 01	<u>Non passive failure</u> lamp non containment during ignition or burning.
C 02	<u>Missing lens (Brite Beam)</u> lamp without front lens or a loose lens ring.
C 03	<u>Broken lens (Brite Beam)</u> broken lens or a loose lens.
C 04	<u>Open airline</u> open airline in lampbulb
C05	<u>Bulb contamination</u> foreign material inside the lamp which can cause non containment.
C 06	<u>Alien brand</u> on lamp etch, sleeve, box or label.

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen
DISTRIBUTION: PRO 1 OPG 1 OPM i-net S&H 0 LABO 0 PURCH 0 QC 1 ENG 1

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

SUBJECT: Quality and Safety Requirements for BriteArc Family

2.2. <u>VITAL DEFECTS</u>	
<u>Code</u>	<u>Defect Description</u>
I 01	<u>Lamp inoperative</u> no starting at nominal supply voltage or lamp extinguishes within 1 min.
I 02	<u>Damaged pins (Single Ended)</u> lamp doesn't fit into respective lampholder gauge acc. to IEC publication 61-3.
I 03	<u>Damaged base threads (Double Ended)</u> lamprnut can't manually be screwed on screw-thread.
I 04	<u>Leaker</u> cracked bulb, seal (detection with sparkcoil), excluding transportation damage.
I 05	<u>Missing lamp</u> box without lamp.
I 06	<u>Broken molybdenum foil</u> lamp inoperative
I 07	<u>Defective weld</u> broken weld between Mo-foil and electrode.
I 08	<u>Excentricity of lens (Brite Beam)</u> displacement of the lens regarding the reflector
I 09	<u>Cracked reflector (Brite Beam)</u>
I 10	<u>Length between base ends (Double Ended)</u> lamp does not fit in lampholder.
I 11	<u>Loose base</u> a base which is found to be loose or becomes loose when inserted into a lampholder
I 12	<u>Cracked leg or outer jacket</u>

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen
DISTRIBUTION: PRO OPG OPM S&H LABO PURCH QC ENG
1 1 i-net 0 0 0 1 1

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

SUBJECT: Quality and Safety Requirements for BriteArc Family

I 13			<p><u>Wrong alignment of tip-off to ceramic lead (PS 575 DE)</u> tip-off points towards ceramic base or is not aligned in ceramic-wire plane</p>
I 14			<p><u>Broken wire (unbased Double Ended lamp)</u></p>
I 15			<p><u>Oxidised weld</u> The weld outer lead-foil or electrode foil is completely oxidised at both sides of the foil The outer lead-foil weld is oxidised (only for free-burning end contacts)</p>

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen
DISTRIBUTION : PRO OPG OPM S&H LABO PURCH QC ENG
1 1 i-net 0 0 0 1 1

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

SUBJECT: Quality and Safety Requirements for BriteArc Family

2.3. <u>MAJOR DEFECTS</u>	
<u>Code</u>	<u>Defect Description</u>
P 01	<u>Poor weld</u> poor weld between Mo-foil and electrode
P 02	<u>Bad exhaust tip</u> - exhaust tip length > 2.5 mm - tip sucked in.
P 03	<u>Bad etch</u> lamp etch misplaced, crooked, partially illegible, parts missing or in any way indistinct.
P 04	<u>Excentricity of the burner (Single Ended)</u>
P 05	<u>Sharp burr on reflector (Brite Beam)</u> burr > 25 mm ² .
P 06	<u>Sharp burr on lens (Brite Beam)</u> burr > 25 mm ² .
P 07	<u>Airlines</u> airlines can cause leakers or non containment.
P 08	<u>Contaminated reflector (Brite Beam)</u> contamination > 25 mm ² .
P 09	<u>Contaminated lens (Brite Beam)</u> contamination > 10 mm ² .
P 10	<u>Contaminated bulb</u> contamination > 25 mm ² .
P 11	<u>Contaminated leg (Double Ended)</u> contamination > 25 mm ² .
P 12	<u>Dirty base</u> excessive dirt > 25 mm ² .

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

DISTRIBUTION: PRO 1 OPG 1 OPM i-net 0 S&H 0 LABO 0 PURCH 0 QC 1 ENG 1

SUBJECT: Quality and Safety Requirements for BriteArc Family

Code	Defect Description
P 13	<u>Electrode position</u> electrodes not in center of glassbulb.
P 14	<u>Split molybdenum</u> split in Mo > 25% of width.
P 15	<u>Oxidized molybdenum</u> molybdenum has dark, grey, blue spots.
P 16	<u>Oxidized electrodes</u> electrode has grey, blue, black colour.
P 17	<u>Oxidized molybdenum</u> molybdenum shows rainbow colours > 10% of surface
P 18	<u>Excess twist, lift, alignment of molybdenum</u> Mo-foils and tip off should be in the same plane. Mo-foils are twisted more than 30° to each other.
P 21	<u>Coating peeling off (Brite Beam)</u>
P 22	<u>Insufficient solder</u> dry solder joint at the end of the pins or the screwthread.
P 23	<u>Insufficient cement</u> insufficient cement can cause a loose lampcap.
P 24	<u>Bent lamppins (Single Ended)</u> lamppins are bent, lamp fits into respective lampholder gauge acc. to IEC publication 61-3.
P 25	<u>Leg deformation (Double Ended)</u>
P 26	<u>Tip-off not aligned in base wire plane (PS 575 DE)</u>
P 27	<u>Damaged Mo-leads (unbased Double Ended lamp)</u>
P 28	<u>Too much cement (PS 575 DE)</u> The cement is not within 4±1 mm from the edge of the ceramic.
P 29	<u>Alignment between cap and bulb</u> ≤ 1.5° measured with excentricity gauge

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

DISTRIBUTION: PRO OPG OPM S&H LABO PURCH QC ENG
1 1 i-net 0 0 0 1 1

SUBJECT: Quality and Safety Requirements for BriteArc Family

2.4. <u>MINOR DEFECTS</u>	
<u>Code</u>	<u>Defect Description</u>
M 01	<u>Oxidized base</u> base has a tarnish colour
M 02	<u>Loose parts inside reflector (Brite Beam)</u> loose non conductive parts in reflector, which rattle audibly when the lamp is shaken.
M 03	<u>Excess cement</u> any cement visible on side of cap, leg > 10 mm ² .
M 04	<u>Excess silica smoke</u>
M 05	<u>Clear spots or scratches in coating of reflector (Brite Beam)</u> surface > 1.5 mm ² .
M 06	<u>Poor etch</u> lamp etch misplaced, crooked, partially illegible, faint, parts missing or in any way indistinct.
M 07	<u>Dirty or oxidized bridge/mount (Brite Beam)</u>
M 08	<u>Dirty reflector (Brite Beam)</u> contamination > 10 mm ² .
M 09	<u>Dirty lens (Brite Beam)</u> contamination > 3 mm ² .
M 10	<u>Dirty bulb</u> contamination at outside > 3 mm ² .
M 11	<u>Dirty leg (Double Ended)</u> contamination > 10 mm ² .
M 12	<u>Dirty base</u> contamination > 10 mm ² .

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen
DISTRIBUTION : PRO OPG OPM S&H LABO PURCH QC ENG
1 1 i-net 0 0 0 1 1

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

SUBJECT: Quality and Safety Requirements for BriteArc Family

Code	Defect Description
M 12	<u>Glass splinter reflector/lens (Brite Beam)</u> glass splinter > 10 mm ² .
M 13	<u>Dirty electrode</u> any contamination on the electrodes
M 14	<u>Discoloured reflector (Brite Beam)</u> external poor appearance of the reflector coating.
M 15	<u>Damaged lampbase</u> visible damage.
M 16	<u>Oxidized leadwires</u>
M 17	<u>Loose parts in bulb</u> loose non conductive parts which rattle audibly when lamp is shaken
M 18	<u>Wrong date code on lamp</u> missing or wrong date code
M 19	<u>Crooked base</u> base more than 1.5° crooked with regards to the leg or outer jacket
M 20	<u>Glass defect</u> knots, stones, streaks, other defects or deformed seal

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen
DISTRIBUTION: PRO 1 OPG 1 OPM i-net S&H 0 LABO 0 PURCH 0 QC 1 ENG 1

STANDARDIZING : M. Van Leuven
Q.A.: R. Geens

SUBJECT: Quality and Safety Requirements for BriteArc Family

2.5. QUANTITATIVE DEFECTS

Code	Defect Description
Q 01	Lamp wattage
Q 02	Operating voltage
Q 03	Luminous flux
Q 04	Colour temperature
Q 05	Colour rendering index (CRI)
Q 06	Average life
Q 08	Lumen maintenance
Q 09	Colour temperature maintenance
Q 10	Lamp dimensions

ISSUED BY : G. Vervecken / K.Desmedt
APPROVED BY : F. Hansen

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

DISTRIBUTION: PRO 1 OPG 1 OPM i-net LABO 0 S&H 0 PURCH 0 QC 1 ENG 1

3. ACCEPTABLE QUALITY LEVEL (AQL)

3.1. Visual Defects

Defect class	Code	AQL	Compliance with
CRITICAL	C	*	Classification of defects
VITAL	I	*	Classification of defects
MAJOR	P	0.65	Classification of defects
MINOR	M	2.5	Classification of defects

* any one defect found rejects total inspection lot.

3.2. Quantitative Defects

Defect Description	Code	AQL	Compliance with
Lamp wattage	Q 01	6.5	lamp data sheet
Operating voltage	Q 02	6.5	lamp data sheet
Luminous flux	Q 03	4.0	lamp data sheet
Colour temperature	Q 04	4.0	lamp data sheet
Colour rendering index	Q 05	4.0	lamp data sheet
Average life	Q 06		lamp data sheet
Lumen maintenance	Q 08	6.5	lamp datasheet
Colour temperature maint.	Q 09	6.5	lamp datasheet
Lamp dimensions	Q 10	6.5	lamp data sheet

3.3. Test conditions

Defect Description	Code	Conditions
Life	Q 21	cycle: 3 hours on, 0.5 hour off*
Drop test	Q 22	to be performed on packed lamps H= 1000 mm drop test: spec. nr. 99E 0602-001

* One exception : BF 150 SE : cycle is 11 hours on, 1 hour off.

ISSUED BY : G. Verweken / K.Desmedt
APPROVED BY : F. Hansen
DISTRIBUTION: PRO OPG OPM S&H LABO PURCH QC ENG
1 1 i-net 0 0 0 1 1

STANDARDIZING : M. Van Leuven
Q.A. : R. Geens

QUESTION 6

December 17, 2008

Mail Control No. 022721

SLi Lighting Products, Inc.
ATTN: Mr. Kevin J. Bonawitz
122 East Laurel St.
Mullins, SC 29575

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT DISTRIBUTION LICENSE

Dear Mr. Bonawitz:

This refers to your Application for Material License, NRC Form 313, dated September 9, 2008. We do not have sufficient information to complete the review of your application. In order to continue our review we ask that you provide the following additional information:

In order to possess and use byproduct material (i.e., radioactive material such as krypton-85), you must first satisfy the general requirements of 10 CFR 30.33. This regulation in essence requires you to apply for and obtain a specific license authorizing possession and use of radioactive material from the State of South Carolina. Please provide us with a copy of your State of South Carolina Possession and Use license.

If any of the documents you have supplied is intended to meet the requirements of Title 10, Code of Federal Regulations, Part 32, described below, please explain their relevance in your response. You should clearly indicate how any document or portion thereof relates to each of the requirements.

The requirements generally pertain to individual product models. You should indicate in your response whether any of the models are part of a design series, in which case the questions below may be answered for the series rather than the individual models. However, please indicate the models belonging to each series, and explain how they differ.

1) Title 10, Code of Federal Regulations, Section 32.14(b)(1) requires details of the chemical and physical form and maximum quantity of byproduct material in each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. It was noted that in response to Item 5 on NRC Form 313 the number "0.0005," without units, was provided for two product types, while no quantity was provided for other product types. Please provide this information for each model that you would like to distribute. **Attached are addendums A, B and C. This is information given to the NRC group in Phila. as well. It shows the max amount of KR 85 used in each sku.**

2) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. Please provide this information for each model that you would like to distribute. **The items SLi is applying for are a series of HID, compact fluorescent lamps and starters. Attached are representative specifications for these sub product groups.**

3) Title 10, Code of Federal Regulations, Section 32.14(b)(3) requires that the method of containment or binding of the radioactive byproduct material in the product be described. Please provide the method of containment or binding of the radioactive byproduct material in the product. **The products described are lamps which are sealed by press methods or lazars. None of the filler gases can leak out of the lamp unless it is handled inappropriately. (dropped)**

4) Title 10, Code of Federal Regulations, Section 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. Please provide these procedures and describe the prototype testing performed on the product. **See lamp testing procedures in the attachments**

5) Title 10, Code of Federal Regulations, Section 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet. **Same as #4.**

6) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. An attachment (nrc_label.jpg) to your email of November 26, 2008 provided a copy of a label for one model of lamp, but the relationship of this label to any of the several lamp types / models listed in another attachment (nrc metal halide bom 252.rtf) is not clear. Please indicate to which model or series this label applies. If labels for all models / series are substantially the same, this should be clearly indicated in your response. Note: For those products requiring labeling, NRC's policy is that the smallest item distributed must display the required label. If this is not possible, then the label should be placed as close as possible to the product. For example, if an electron tube is too small to label, then the label should be placed on the next smallest container, such as the bubble pack containing the electron tube. **Every lamp inner carton has the KR85 label. We also label the outer carton as well. Attached are samples of the labels.**

7) Title 10, Code of Federal Regulations, Section 32.14(c) requires that each product will contain no more than the quantity of byproduct material specified for that product in '30.15. Please provide the quantity of byproduct material specified for your product. **Same as question #1. See addendum A, B, and C.**

8) Title 10, Code of Federal Regulations, Section 32.14(d)(1) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe how the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. **The items in question are lightbulbs. Lightbulbs are sealed by press and lazar methods so none of the filler gases can release. The KR85 is properly contained and will not release with normal use and handling.**

9) Title 10, Code of Federal Regulations, Section 32.15(a)(1) requires that each person licensed under '32.14 shall maintain quality assurance practices in the manufacture of the

part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. **This is also covered by the attachments in our answers to questions 4 + 5.**

10) Title 10, Code of Federal Regulations, Section 32.15(a)(3) requires that each person licensed under '32.14 shall visually inspect each unit in inspection lots. Any unit that has an observable physical defect that could affect containment of the byproduct material shall be considered as a defective unit. Please describe how you shall visually inspect each unit in inspection lots for defects. **Same as question 9.**

11) Title 10, Code of Federal Regulations, Section 32.15(c) requires that no person licensed under '32.14 shall transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. **I am in charge of R+D and quality for Sylvania in the America's. All defective lamps returned by US cusotomers are reviewed.**

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information. In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Any correspondence regarding your amendment application should reference the control number specified above.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

Code : 7223904

Made in Belgium

GZZ9.5

AT filling gas contains Kr85



BA 400 SE HR

Code : 7223904

Made in Belgium

GZZ9.5



AT filling gas contains Kr85



NOTICE

Lamps designated with

KR85 are considered

hazardous waste. Follow proper disposal procedures.

KR85 lamps include: Metal Halide, Staters, Glowbottles, and 2-pin Compact Fluorescent.

Notify your Radiation Safety Officer (RSO), Sammy Smith, before disposing of lamps.

QUCSTW-7

December 17, 2008

Mail Control No. 022721

SLi Lighting Products, Inc.
ATTN: Mr. Kevin J. Bonawitz
122 East Laurel St.
Mullins, SC 29575

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2) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. Please provide this information for each model that you would like to distribute. **The items SLi is applying for are a series of HID, compact fluorescent lamps and starters. Attached are representative specifications for these sub product groups.**

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5) Title 10, Code of Federal Regulations, Section 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet. **Same as #4.**

6) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. An attachment (nrc_label.jpg) to your email of November 26, 2008 provided a copy of a label for one model of lamp, but the relationship of this label to any of the several lamp types / models listed in another attachment (nrc metal halide bom 252.rtf) is not clear. Please indicate to which model or series this label applies. If labels for all models / series are substantially the same, this should be clearly indicated in your response. Note: For those products requiring labeling, NRC's policy is that the smallest item distributed must display the required label. If this is not possible, then the label should be placed as close as possible to the product. For example, if an electron tube is too small to label, then the label should be placed on the next smallest container, such as the bubble pack containing the electron tube. **Every lamp inner carton has the KR85 label. We also label the outer carton as well. Attached are samples of the labels.**

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Any correspondence regarding your amendment application should reference the control number specified above.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely;

/RA/

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

	ITEM 5A	ITEM 5B	ITEM 5C	ITEM 5C	
Total Kr 85 #'s in microcuries					
product type	Kr 85 amount		in stock units	max total Kr 85	
Starters and glo-bottles	0.0005	gas	855,877	427.94	microcuries
compact fluorescent lamps	0.0005	gas	177,446	88.72	microcuries
HID lamps used in:	see hid pg	gas	90,628	187.486	microcuries
General Lighting, Tanning beds, Photo Optic applications, Aquariums	below	gas			
Totals				704.15	microcuries
				1000.00	microcuries max inventory
Item 6	Lamp distribution				
Item 7	Ingrid Lohrengel	San Jose Costa Rica			Manager Facilities Environment and Safety
	Patrick Beerten	Tienen Belgium			Manager Facilities Environment and Safety
	John Stocks	Shipleigh England			Manager Facilities Environment and Safety
Item 8	see attached Havells Sylvania Training documents				
Item 9	Manufacturer/Distributor of Lighting Products				
Item 10	see attached Havells Sylvania Training documents				
Item 11	Follow all hazardous waste rules and regulations per state and country				

Addendum A --CFL

Short	WH	Part description	Lamp type	kr 85	On hand	hours	wattage	color	base type	bulb	lumens	weight	length	width	height	cu ft	Pkg	Item UPC code	Ctn UPC code
26393	CA	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	0	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26393	D1	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	0	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26393	FL	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	50	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26393	HS	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	150	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26393	IN	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	138	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26393	MS	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	50	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26393	NJ	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	170	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26393	PH	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	90	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26393	TX	CF26LD/830 50PK	LYNX DOUBLE	0.0005 microcuries	0	10000	26 3000K	G24D-3	T3	1800	9	14.5	7.75	7	0.46	50	006-64608-26393-1	106-64608-26393-8	
26480		CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	808	10000	5 5000K	G23	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5	
26480	CA	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	88	10000	5 5000K	G23	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5	
26480	D1	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	277	10000	5 5000K	G23	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5	
26480	FL	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	100	10000	5 5000K	G23	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5	
26480	NJ	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	250	10000	5 5000K	G23	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5	
26480	PH	CF5LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	5 5000K	G23	T3	250	3	9	7.5	4.5	0.18	50	006-64608-26480-8	106-64608-26480-5	
26481		CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	47	10000	7 5000K	G23	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2	
26481	D1	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	125	10000	7 5000K	G23	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2	
26481	FL	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	200	10000	7 5000K	G23	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2	
26481	HS	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	628	10000	7 5000K	G23	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2	
26481	IN	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	155	10000	7 5000K	G23	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2	
26481	NJ	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	109	10000	7 5000K	G23	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2	
26481	PH	CF7LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	7 5000K	G23	T3	420	4	9.25	7.5	5.75	0.23	50	006-64608-26481-5	106-64608-26481-2	
26482		CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	805	10000	9 5000K	G23	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9	
26482	CA	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	9 5000K	G23	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9	
26482	D1	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	82	10000	9 5000K	G23	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9	
26482	FL	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	9 5000K	G23	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9	
26482	HS	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	38	10000	9 5000K	G23	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9	
26482	IN	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	130	10000	9 5000K	G23	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9	
26482	NJ	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	100	10000	9 5000K	G23	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9	
26482	PH	CF9LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	9 5000K	G23	T3	600	6	9.5	7.5	7	0.29	50	006-64608-26482-2	106-64608-26482-9	
26483		CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	9736	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	CA	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	302	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	D1	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	88	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	FL	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	HS	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	150	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	IN	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	200	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	NJ	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	350	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	PH	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	TX	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	150	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
26483	WA	CF13LS/850 50PK	LYNX SINGLE	0.0005 microcuries	0	10000	13 5000K	GX23	T3	850	7	9.25	7.5	7.25	0.29	50	006-64608-26483-9	106-64608-26483-6	
30606		F9TT QUAD/827	LYNX DOUBLE	0.0005 microcuries	2445	10000	9 2700K	G23-2	T3	525	6.4	14.4	7.5	5.9	0.37	50	006-64608-30617-1	106-64608-30617-8	
30617		F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	8881	10000	22 2700K	GX32D-2	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8	
30617	D1	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	109	10000	22 2700K	GX32D-2	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8	
30617	FL	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	50	10000	22 2700K	GX32D-2	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8	
30617	IN	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	147	10000	22 2700K	GX32D-2	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8	
30617	MS	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	50	10000	22 2700K	GX32D-2	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8	
30617	NJ	F22TT/QUAD/827 50PK	HI LUM PL TUBE	0.0005 microcuries	110	10000	22 2700K	GX32D-2	T4	1200	11	19.25	10.25	7.25	0.83	50	006-64608-30617-1	106-64608-30617-8	
30618		F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	14	10000	28 2700K	GX32D-3	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6	
30618	D1	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6	
30618	FL	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6	
30618	HS	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6	
30618	IN	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6	
30618	PH	F28TT/QUAD/827 40PK	HI LUM PL TUBE	0.0005 microcuries	0	10000	28 2700K	GX32D-3	T4	1600	11	19.25	10.25	7.25	0.83	40	500-51849-30618-6	500-51849-30618-6	
70420		CFS/13/850 25 PK TETRA	13 CFS	0.0005 microcuries	2000	10000	13 5000K	GX23	T3	850	0	17	10.75	17	1.8				

Addendum B -- HID

Short	Long product cd	Part description	Concentration Kr85		Volume arc tube (in cm)	Filling pressure (mbar)	radioactivity in MBq	radioactivity in microCi	Lamp type	On hand	total micro Ci	weight	length	width	height	cu ft	Item UPC code	Ctn UPC code
			in filling gas (MBq/l)	in filling gas (microCi/l)														
20250	5020250-SLI	MBS ES36 39W 8	1.11	0.0785	400	3.49E-05	0.000941058	ES16	435	0.40936	8	189	11.25	5	6.15	006-64608-20250-3		
20251	5020251-SLI	MBS ES36 39W 24	1.11	0.0785	400	3.49E-05	0.000941058	ES16	465	0.437562	9	18	11	5	0.57	000-64608-20251-8		
20270	5020270-SLI	MBS ES16 39W 38 15PK	1.11	0.0785	400	3.49E-05	0.000941058	ES16	172	0.067756	2	11	6.5	3	0.12	000-64608-20270-9	106-64608-20270-8	
20271	5020271-SLI	MBS ES16 39W 60 15PK	1.11	0.0785	400	3.49E-05	0.000941058	ES16	185	0.174096	2	11	6.5	3	0.12	000-64608-20271-6	600-64608-20271-8	
20272	5020272-SLI	MBS ES16 39W 24 15PK	1.11	0.0785	400	3.49E-05	0.000941058	ES16	0	0	2	11	6.5	3	0.12	000-64608-20272-3	000-64608-20272-3	
21040	5021040-70	MH150 DE 20K 10PK	1.11	1.85	105.2631579	2.16E-04	0.005836263	MH MED	1650	9.629834	2	8.75	8.25	4	0.17	006-64608-21040-9	106-64608-21040-6	
21041	5021041-70	MH250 DE 20K 10PK	1.11	4.17	105.2631579	4.87E-04	0.013155253	MH MOG	1370	18.0227	2	11.5	11	5	0.37	006-64608-21041-6	106-64608-21041-3	
21042	5021042-70	MH150 DE 13K	1.11	1.85	105.2631579	2.16E-04	0.005836263	MH MED	728	4.2488	2	9	6.75	2.75	0.1	006-64608-21042-3	106-64608-21042-0	
21043	5021043-70	MH250 DE 13K 12PK	1.11	4.17	105.2631579	4.87E-04	0.013155253	MH MOG	650	8.550914	2	9	6.75	2.75	0.1	006-64608-21043-0	106-64608-21043-7	
54260	5024260-SLI	PBF 400W S PURE BRONZE 1PK	1.11	3.26	100	3.62E-04	0.00977022	SUNTAN	4754	46.44763	5	19.75	10	7.75	0.89	006-64608-54260-9	000-64608-54260-7	
54261	5024261-SLI	PBF 400W C PURE BRONZE 1PK	1.11	3.26	100	3.62E-04	0.00977022	SUNTAN	120	1.172426	5	19.75	10	7.75	0.89	006-64608-54261-4	000-64608-54261-4	
54262	5024262-SLI	PBF 400W SE PURE BRONZE 1PK	1.11	3.26	100	3.62E-04	0.00977022	SUNTAN	2330	22.76461	5	19.75	10	7.75	0.89	006-64608-54262-3	106-64608-54262-0	
54270	5024270-SLI	PBF 500W S PURE BRONZE 1PK	1.11	4.797	50	2.66E-04	0.007188305	SUNTAN	296	2.127738	5	19.75	10	7.75	0.89	006-64608-54270-8	106-64608-54270-5	
54271	5024271-SLI	PBF 500W C PURE BRONZE 1PK	1.11	4.797	50	2.66E-04	0.007188305	SUNTAN	82	0.589441	7	19.75	10	7.75	0.89	006-64608-54271-5	106-64608-54271-2	
54272	5024272-SLI	PBF 500W SE PURE BRONZE 50PK	1.11	4.797	50	2.66E-04	0.007188305	SUNTAN	1552	11.15625	7	19.75	10	7.75	0.89	006-64608-54272-2	106-64608-54272-9	
54280	5024280-SLI	PBF 1000W C 230V PURE BRZE 1PK	1.11	16.73	50	9.29E-04	0.025069905	SUNTAN	258	6.468035	10	19.75	10	7.75	0.89	006-64608-54280-7	106-64608-54280-4	
54281	5024281-SLI	PBF 1000W C 400V PURE BRNZ 1PK	1.11	16.73	50	9.29E-04	0.025069905	SUNTAN	62	1.554334	10	20	10	8	0.93	006-64608-54281-4	106-64608-54281-1	
54290	5024290-SLI	PBF 2000W C 400V PURE BRNZ 1PK	1.11	27.92	50	1.55E-03	0.04183812	SUNTAN	392	15.40054	4	17	12.25	7.25	0.87	006-64608-54290-6	106-64608-54290-3	
73904	7223904-70	HID BA400 SE HR 10PK	1.11	1.2	400	5.33E-04	0.01438556	HID BA400	91	1.30909	1	9.5	3.75	7	0.14	006-64608-73904-7	106-64608-73904-4	
73915	7223915-70	HID BA575 DE 10PK	1.11	2.06	400	9.15E-04	0.02469528	HID	15	0.370429	0	0	0	0	0	0	006-64608-73915-3	106-64608-73915-0
73916	7223916-70	BA1200 DE 10PK	1.11	5.37	400	2.38E-03	0.06437556	BA1200	0	0	5	16.75	12.25	7	0.83	006-64608-73916-0	106-64608-73916-7	
73917	7223917-70	BA2500W DE 1PK	1.11	13.1	400	5.82E-03	0.1570428	BA2500	5	0.785214	1	0	0	0	0	0	0	0
73919	7223919-70	HID BA1200 DE 1PK	1.11	5.37	400	2.38E-03	0.06437556	HID	0	0	0	0	0	0	0	0	0	0
73939	7223939-70	HID BA575 SE HR 10PK	1.11	2.1	200	4.66E-04	0.0125874	HID BA575	0	0	5	16.75	12.25	7	0.83	006-64608-73939-9	106-64608-73939-6	
73949	7223949-70	HID BA1200 SE HR 10PK	1.11	4.51	400	2.00E-03	0.05406588	HID BA1200	44	2.378899	4	16.75	12.25	7	0.83	006-64608-73949-8	106-64608-73949-5	
73951	7003951-70	BA2500W/SE/HR	1.11	13.1	400	5.82E-03	0.1570428	BA250	14	2.198599	0	19	14	13	2			
73954	7223954-70	BA4000W DE 1PK	1.11	29.3	400	1.30E-02	0.3512484	BA4000	2	0.702497	1	19.5	5	5	0.28			
73956	7223956-70	HID BA200 SE HR 10PK	1.11	0.9	400	4.00E-04	0.0107892	HID BA200	94	1.014185	1	9.5	4	7.25	0.16	006-64608-73956-6	106-64608-73956-3	
73969	7223969-70	HID S BS575W DE	1.11	2.06	400	9.15E-04	0.02469528	HID S BS575W	35	0.864335	4	16.75	12.25	7.5	0.89	006-64608-73969-6	106-64608-73969-3	
73983	7223983-70	BA 575W SE D 10PK	1.11	2.1	200	4.66E-04	0.0125874	BA575	16	0.201398	0	0	0	0	0	0	0	0
73991	7223991-70	HID BA800 SE HR 10PK	1.11	4.24	600	2.82E-03	0.07624368	HID BA800	37	2.821016	6	17	12.25	7	0.84	006-64608-73991-7	106-64608-73991-4	
73993	7223993-70	BA250 SE D 5800K 10PK	1.11	1.2	200	2.66E-04	0.0071928	BA250	15	0.107892	1	9.5	4	7.25	0.16	006-64608-73993-1	106-64608-73993-8	
73997	7223997-70	BA1200W DE S 7.2 10PK	1.11	1.92	200	4.26E-04	0.01150848	BA1200	99	1.13034	4	16.75	12.25	7	0.83			
73999	7223999-70	BA250/2 SE D 8.5 10PK	1.11	1.2	200	2.66E-04	0.0071928	BA250	559	4.020775	1	9.5	4	7.25	0.16	006-64608-73999-3	106-64608-73999-0	
74001	7224001-70	BA 575/2 SE 8.5	1.11	2.1	200	4.66E-04	0.0125874	BA575	52	0.654545	5	17	12.25	7.25	0.87	006-64608-74001-2	106-64608-74001-9	
74413	7224413-70	BA 575/2 SE NHR 7.2 10PK	1.11	2.1	200	4.66E-04	0.0125874	BA575	487	6.130064	4	16.75	12.25	7	0.83	006-64608-74413-3	106-64608-74413-0	
20301	5020301-SLI	MH70U/MEDIUM 12PK	1.11	0.000467	Metal Halide	1098	0.051277	12	11	9.1	6.3	0.36	006-64608-20301-2	106-64608-20301-9				
20302	5020302-SLI	MH100U/MEDIUM 20PK	1.11	0.000711	Metal Halide	1774	0.126131	12	11	9.1	6.3	0.36	006-64608-20302-9	106-64608-20302-6				
20303	5020303-SLI	MH150U/MED 12PK	1.11	0.000901	Metal Halide	2185	0.196869	12	11	9.1	6.3	0.36	006-64608-20303-6	106-64608-20303-3				
28901	3028901-SLI	MH70P/U/MED 20PK	1.11	0.000467	Metal Halide	3674	0.171576	0	14	11.5	7.75	0.72	006-64608-28901-6	106-64608-28901-3				
28904	3028904-SLI	MH100P/U/MED 20PK	1.11	0.000711	Metal Halide	4650	0.330615	0	14	11.5	7.5	0.7	006-64608-28904-7	106-64608-28904-4				
29001	3029001-SLI	MH250PS/BU 6PK	1.11	0.000149	Metal Halide	457	0.068093	3	11.25	7.75	9.5	0.48	006-64608-29001-2	106-64608-29001-9				
29002	3029002-SLI	MH175PS/BU 12PK	1.11	0.000122	Metal Halide	311	0.037942	0	10.25	8	6.75	0.32	006-64608-29002-9					
29003	3029003-SLI	MH320PS/BU 12PK	1.11	0.0002103	Metal Halide	2604	0.547621	2	11	7.75	9	0.44	006-64608-29003-6	106-64608-29003-3				
29004	3029004-SLI	MH400PS/BU 6PK	1.11	0.0002663	Metal Halide	1378	0.353646	5	15.25	10.25	12	1.09	006-64608-29004-3	106-64608-29004-0				
29100	3029100-SLI	MH400P/BU 6PK	1.11	0.0002663	Metal Halide	738	0.196529	6	15.25	10.25	12	1.09	006-64608-29100-2	106-64608-29100-9				
29113	3029113-01	MH350P/PS/BU 6PK	1.11	0.0002103	Metal Halide	2963	0.623119	0	15.25	10.25	12	1.09	006-64608-29113-2	106-64608-29113-9				
30006	SM4011-031-01	MH175U/MED 20PK	1.11	0.000122	Metal Halide	8013	0.977586	3	11.5	6.5	11.5	0.5	006-64608-30006-3	106-64608-30006-0				
30007	SM4111-031-01	MH175U 6PK	1.11	0.000122	Metal Halide	7099	0.855098	3	11	8	9.5	0.48	006-64608-30007-0	106-64608-30007-7				
30009	SM5111-031-01	MH250U 6PK	1.11	0.000149	Metal Halide	11675	1.738575	2.85	11.25	8	9	0.47	006-64608-30009-4	106-64608-30009-1				
30011	SN6111-030-01	MH400U 6PK	1.11	0.0002663	Metal Halide	16901	4.500736	4.7	16	11	12.5	1.27	006-64608-30011-7	106-64608-30011-4				
30013	SN7111-031-01	MH400U/ALU/ED28 12PK	1.11	0.0002663	Metal Halide	162	0.043141	7	17.75	14	10	1.44	006-64608-30013-1	106-64608-30013-8				
30014	SN7911-030-01	MS400/BU/LU 6PK	1.11	0.0002663	Metal Halide	51	0.016244	7	12.5	10.75	13.5	1.05						
30015	SN7921-030-01	MH400U/ED28 REDUCED JKT 6PK	1.11	0.0002663	Metal Halide	5738	1.528029	3	12.25	8	10.25	0.58	006-64608-30015-5	106-64608-30015-2				
30016	SM5121-031-01	MS250/BU/LU 12PK	1.11	0.000149	Metal Halide	1070	0.15943	6	11	9	13	0.74	006-64608-30016-2	106-64608-30016-9				
30018	SM4121-030-01	MS400C/BU/LU 6PK	1.11	0.0002663	Metal Halide	1	0.000266	6	16.75	12.25	13	1.54	006-64608-30018-6	106-64608-30018-3				
30023	SM1011-031-01	MH50U/MED 12PK	1.11	0.000337	Metal Halide	1250	0.042125	3	11.5	9.5	7	0.44	006-64608-30023-0	106-64608-30023-7				

totals

90628 187.486 microcuries

Addendum C -- starters

Short	WH	Long product cd	Part description	Lamp type	kr85	On hand	length	width	height	cu ft	Item UPC code	Ctn UPC code
18342		428325P	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	1349	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	CA	428325P-CA	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	475	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	D1	428325P-D1MVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	413	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	FL	428325P-FLMVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	375	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	HS	428325P-HS	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	200	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	IN	428325P-INMVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	825	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	MS	428325P-MS	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	NJ	428325P-NJMVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	975	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	PH	428325P-PH	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	200	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	TX	428325P-TXMVL	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	675	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18342	WA	428325P-WA	FS2 STARTER 782-7090 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18342-3	500-51849-18342-8
18343		448325P	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	7040	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	CA	448325P-CASF	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	475	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	D1	448325P-D1MVL	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	250	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	FL	448325P-FLMVL	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	HS	448325P-HS	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	200	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	IN	448325P-IN	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	650	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	NJ	448325P-NJ	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	875	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	PH	448325P-PH	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	TX	448325P-TXMVL	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	175	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18343	WA	448325P-WA	FS4 STARTER 782-7091 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18343-0	500-51849-18343-5
18344		458225P	FS5 STARTER 25PK	STARTER	0.0005 microcuries	2475	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	CA	458225P-CA	FS5 STARTER 25PK	STARTER	0.0005 microcuries	225	0	0	0	0	000-51849-18344-7	500-51849-18344-2
18344	D1	458225P-D1	FS5 STARTER 25PK	STARTER	0.0005 microcuries	125	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	FL	458225P-FL	FS5 STARTER 25PK	STARTER	0.0005 microcuries	275	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	IN	458225P-IN	FS5 STARTER 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	MA	458225P-MA	FS5 STARTER 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	NJ	458225P-NJ	FS5 STARTER 25PK	STARTER	0.0005 microcuries	250	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	PH	458225P-PH	FS5 STARTER 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	TX	458225P-TX	FS5 STARTER 25PK	STARTER	0.0005 microcuries	175	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18344	WA	458225P-WA	FS5 STARTER 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.75	0.99	000-51849-18344-7	500-51849-18344-2
18345		438225P	FS12 STARTER 25PK	STARTER	0.0005 microcuries	7890	18	9.75	9.5	0.96	000-51849-18345-4	500-51849-18345-9
18345	D1	438225P-D1	FS12 STARTER 25PK	STARTER	0.0005 microcuries	166	18	9.75	9.5	0.96	000-51849-18345-4	500-51849-18345-9
18345	IN	438225P-IN	FS12 STARTER 25PK	STARTER	0.0005 microcuries	25	0	0	0	0	000-51849-18345-4	500-51849-18345-9
18345	NJ	438225P-NJ	FS12 STARTER 25PK	STARTER	0.0005 microcuries	350	18	9.75	9.5	0.96	000-51849-18345-4	500-51849-18345-9
18346		428225P	FS22 STARTER 25PK	STARTER	0.0005 microcuries	3182	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18346	CA	428225P-CASF	FS22 STARTER 25PK	STARTER	0.0005 microcuries	475	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18346	D1	428225P-D1	FS22 STARTER 25PK	STARTER	0.0005 microcuries	500	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18346	FL	428225P-FL	FS22 STARTER 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18346	IN	428225P-IN	FS22 STARTER 25PK	STARTER	0.0005 microcuries	2375	18	9.75	9.5	0	000-51849-18346-1	500-51849-18346-6
18346	NJ	428225P-NJ	FS22 STARTER 25PK	STARTER	0.0005 microcuries	275	18	9.75	9.5	0.96	000-51849-18346-1	500-51849-18346-6
18347		425325P	FS25 STARTER 25PK	STARTER	0.0005 microcuries	14865	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	CA	425325P-CA	FS25 STARTER 25PK	STARTER	0.0005 microcuries	239	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	D1	425325P-D1	FS25 STARTER 25PK	STARTER	0.0005 microcuries	370	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	FL	425325P-FL	FS25 STARTER 25PK	STARTER	0.0005 microcuries	25	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	IN	425325P-IN	FS25 STARTER 25PK	STARTER	0.0005 microcuries	675	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	NJ	425325P-NJ	FS25 STARTER 25PK	STARTER	0.0005 microcuries	600	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	PH	425325P-PH	FS25 STARTER 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	TX	425325P-TX	FS25 STARTER 25PK	STARTER	0.0005 microcuries	100	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18347	WA	425325P-WA	FS25 STARTER 25PK	STARTER	0.0005 microcuries	0	18	9.75	9.5	0.96	000-51849-18347-8	500-51849-18347-3
18349		423021	FS20 STARTER 10PK	STARTER	0.0005 microcuries	90	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	CA	423021-CASF	FS20 STARTER 10PK	STARTER	0.0005 microcuries	40	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	D1	423021-D1	FS20 STARTER 10PK	STARTER	0.0005 microcuries	80	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	FL	423021-FL	FS20 STARTER 10PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	HS	423021-HS	FS20 STARTER 10PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18349	NJ	423021-NJ	FS20 STARTER 10PK	STARTER	0.0005 microcuries	80	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7

Addendum C -- starters

Short	WH	Long product cd	Part description	Lamp type	kr85	On hand	length	width	height	cu ft	Item UPC code	Ctn UPC code
18349	TX	423021-TX	FS20 STARTER 10PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03	000-51849-18349-2	500-51849-18349-7
18350		438660P-66	FS-12 N/C CERTIFIED STARTER	STARTER	0.0005 microcuries	35000	0	0	0	0		
31644		4220010	ASSY-22 T GLOBOTTLE ASSEMBLY	STARTER	0.0005 microcuries	0	0	0	0	0		
31645		4220015	ASSY-22S GLOB.ASY - #SP4-25	STARTER	0.0005 microcuries	0	0	0	0	0		
31646		4220022	ASS-22H GLOBOTTLE ASY.	STARTER	0.0005 microcuries	0	0	0	0	0		
31647		423000	FS-20 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
31649		4230211	FS-20 (COP20) S 10PK US-GOVT	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31649	RF	4230211-RF	FS-20(COP0) S 10PK US GOV'T	STARTER	0.0005 microcuries	5000	18.5	10	9.5	1.02		
31650		425000P	FS-25 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31651		425120P	FS-25 SYLVANIA 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
31652		425121P	FS-25 SLI 10 PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03		
31652	RF	425121-P	FS-25 SLI 10 PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03		
31652	RP	31652-RP	FS-25 SLI 10 PK	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03		
31653		425123P	FS-21 HEMCO BULK	STARTER	0.0005 microcuries	2000	10.75	10.75	16	1.07		
31655		425180P	FS-25 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	20000	10.75	10.75	16	1.07		
31656		425260P	FS-25 HEMCO 25 PK	STARTER	0.0005 microcuries	1800	17.75	9.75	9.5	0.95		
31657		425300P	FS-25 CERTIFIED 25 PK	STARTER	0.0005 microcuries	1325	0	0	0	0		
31659		425350P	FS-25 HEMCO BULK	STARTER	0.0005 microcuries	0	10.75	10.75	16	1.07		
31660		425390P	FS-25 CERTIFIED BULK	STARTER	0.0005 microcuries	5000	0	0	0	0		
31661		425420P	FS-25 LEV(WWG)10PK #500-13889	STARTER	0.0005 microcuries	2200	18.75	10	9.5	1.03		
31662		426001	FS-22 SLI PLASTIC	STARTER	0.0005 microcuries	7000	18.5	10	9.5	1.02		
31663		427001	FS-11 SLI 10 PK	STARTER	0.0005 microcuries	3814	18.5	10	9.5	1.02		
31663	WA	427001-WA	FS-11 SLI 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31664		428000P	FS-2 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31665		428120P	FS-2 SYLVANIA 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
31666		428121P	FS-2 SLI 10 PK	STARTER	0.0005 microcuries	500	18.75	10	9.5	1.03		
31666	RF	428121P-CRS	FS-2 SLI 10 PK	STARTER	0.0005 microcuries	1000	18.75	10	9.5	1.03		
31667		428122	FS-2 GOV'T (10 PK)	STARTER	0.0005 microcuries	0	0	0	0	0		
31668		428170P	FS-2 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	10000	10.75	10.75	16	1.07		
31672		428240P	FS-22 HEMCO BULK	STARTER	0.0005 microcuries	7000	10.75	10.75	16	1.07		
31673		428270P	FS-2 LEV.BLK #CA-950-12409-000	STARTER	0.0005 microcuries	0	10.75	10.75	16	1.07		
31674		428300P	FS-22 SLI BULK	STARTER	0.0005 microcuries	84800	10.75	10.75	16	1.07		
31676		428380P	FS-2 HEMCO 25 PK	STARTER	0.0005 microcuries	1950	18	10	9.5	0.99		
31677		428410P	FS-2 LEVITON 10 PK #000-13886	STARTER	0.0005 microcuries	7000	18.75	10	9.5	1.03		
31678		428420P	FS-2 LEV(WWG) 10PK #500-13886	STARTER	0.0005 microcuries	8700	18.5	10	9.5	1.02		
31679		428430P	FS-2 HEMCO BULK	STARTER	0.0005 microcuries	1000	0	0	0	0		
31680		428490P	FS-2 CERTIFIED 25 PK	STARTER	0.0005 microcuries	2150	18	10	9.5	0.99		
31680	FL	428490P-FL	FS-2 CERTIFIED 25 PK	STARTER	0.0005 microcuries	175	18	10	9.5	0.99		
31681		428500	FS-22H SLI POLYCARB. WHOLE	STARTER	0.0005 microcuries	20000	10.75	10.75	16	1.07		
31682		428830P	FS-2 CERTIFIED BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
31682	DT	428830P-DT	FS-2 CERTIFIED BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
31684		438260P	FS-12 LEV/BK CA-950-12411-000	STARTER	0.0005 microcuries	0	0	0	0	0		
31685		438380P	FS-12 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	3000	10.75	10.75	16	1.07		
31686		441000	FS-40/400 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31687		441020	FS-40/400 (COP-40/400) SYL.	STARTER	0.0005 microcuries	0	18.75	10	9.5	1.03		
31690		4413500	FS-40/400 LEVITON II(WWG)	STARTER	0.0005 microcuries	1630	18.75	10	9.5	1.03		
31691		448000P	FS-4 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31692		448120P	FS-4 SYLVANIA 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
31693		448121P	FS-4 SLI 10 PK	STARTER	0.0005 microcuries	2100	18.75	10	9.5	1.03		
31694		448170P	FS-4 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	12000	10.75	10.75	16	1.07		
31695		448200P	FS-4 SYLVANIA BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
31697		448270P	FS-4 LEV.BLK #CA-950-12410-000	STARTER	0.0005 microcuries	0	10.75	10.75	16	1.07		
31699		448370P	FS-4 HEMCO 25 PK	STARTER	0.0005 microcuries	375	18	10	9.5	0.99		
31700		448410P	FS-4 LEVITON 10 PK.#000-13891	STARTER	0.0005 microcuries	4500	18.5	10	9.5	1.02		
31701		448420P	FS-4 LEV(WWG) 10PK #500-13891	STARTER	0.0005 microcuries	6200	18.5	10	9.5	1.02		
31702		448500P	FS-4 SLI W/ HOLE BULK	STARTER	0.0005 microcuries	0	0	0	0	0		

Addendum C -- starters

Short	WH	Long product cd	Part description	Lamp type	kr85	On hand	length	width	height	cu ft	Item UPC code	Ctn UPC code
31703		448520P	FS-4 HEMCO BULK	STARTER	0.0005 microcuries	14000	10.75	10.75	16	1.07		
31704		448630P	FS-4 CERTIFIED 25 PK	STARTER	0.0005 microcuries	1125	18	10	9.5	0.99		
31704	FL	448630P-FL	FS-4 CERTIFIED 25 PK	STARTER	0.0005 microcuries	75	18	10	9.5	0.99		
31704	RF	448630P-CRS	FS-4 CERTIFIED 25 PK	STARTER	0.0005 microcuries	0	18	10	9.5	0.99		
31705		448830P	FS-4 CERTIFIED BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
31706		458000P	FS-5 HUBBELL 10 PK	STARTER	0.0005 microcuries	0	18.5	10	9.5	1.02		
31707		458121P	FS-5 SYLVANIA 10 PK	STARTER	0.0005 microcuries	9990	18.5	10	9.5	1.02		
31708		458122P	FS-5 SLI 10 PK	STARTER	0.0005 microcuries	4500	18.5	10	9.5	1.02		
31710		458180P	FS-5 GENERAL ELECTRIC BULK	STARTER	0.0005 microcuries	4000	10.75	10.75	16	1.07		
31711		458190P	FS-5 HEMCO 25 PK	STARTER	0.0005 microcuries	2350	17.75	9.75	9.5	0.95		
31713		458260P	FS-5 HEMCO BULK	STARTER	0.0005 microcuries	6000	10.75	10.75	16	1.07		
31714		458280P	FS-5 CERTIFIED BULK	STARTER	0.0005 microcuries	1000	10.75	10.75	16	1.07		
31715		458330P	FS-5 CERTIFIED 25 PK	STARTER	0.0005 microcuries	500	17.75	9.75	9.5	0.95		
31715	FL	458330P-FL	FS-5 CERTIFIED 25 PK	STARTER	0.0005 microcuries	175	17.75	9.75	9.5	0.95		
31716		458410P	FS-5 LEVITON 10 PK #000-13894	STARTER	0.0005 microcuries	2900	18.5	10	9.5	1.02		
31717		458420P	FS-5 LEV(WWG) 10PK #500-13894	STARTER	0.0005 microcuries	1000	18.5	10	9.5	1.02		
31718		4590000	COSMEDICO 100W STARTER	STARTER	0.0005 microcuries	0	0	0	0	0		
31719		4591000	COSMEDICO 140W STARTER	STARTER	0.0005 microcuries	0	0	0	0	0		
31720		482230	GB-22E GLOBOTTLE	STARTER	0.0005 microcuries	29449	27	10.25	10	1.6		
31721		4822310	GB-22E GE	STARTER	0.0005 microcuries	28000	27	10.25	10	1.6		
31722		4822320	GB-22E GLOBOTTLE/ROBERTSON	STARTER	0.0005 microcuries	0	0	0	0	0		
31723		482310	GB-22 TL GLOBOTTLE	STARTER	0.0005 microcuries	0	27	10.25	10	1.6		
31726		485520	GB-26 GLOBTTLE	STARTER	0.0005 microcuries	0	27	10.25	10	1.6		
31727		485530	GB-26 GREEN STRIPE GLOBOTTLE	STARTER	0.0005 microcuries	6000	27	10.25	10	1.6		
31728		485760	GB-58	STARTER	0.0005 microcuries	2000	27	10.25	10	1.6		
31729		485770	GB-43 GLOBOTTLE	STARTER	0.0005 microcuries	58000	0	0	0	0		
31730		485780	GB-43 TL	STARTER	0.0005 microcuries	42000	27	10.25	10	1.6		
31733		491146	FS-2B REGENT	STARTER	0.0005 microcuries	0	18.25	9.5	19	1.91		
31734		491153	FS-2C #256149/34540	STARTER	0.0005 microcuries	75475	18.5	9.5	18	1.83		
31735		492143	FS-4B REGENT	STARTER	0.0005 microcuries	18300	18.25	9.5	19	1.91		
31736		492150	FS-4C #256156/34541	STARTER	0.0005 microcuries	45825	0	0	0	0		
31737		493140	FS-5B REGENT	STARTER	0.0005 microcuries	12625	18.25	9.5	19	1.91		
31738		493157	FS-5C #166402/19940	STARTER	0.0005 microcuries	3625	18.5	9.5	18	1.83		
31739		494147	FS-12B REGENT	STARTER	0.0005 microcuries	0	18.25	9.5	19	1.91		
31740		494154	FS-12C #256164/34542	STARTER	0.0005 microcuries	2450	18.5	9.5	18	1.83		
31741		495144	FS-22B REGENT	STARTER	0.0005 microcuries	9275	18.25	9.5	19	1.91		
31746		496141	FS-25B REGENT	STARTER	0.0005 microcuries	5350	18.25	9.5	19	1.91		
31747		496158	FS-25C #256172/5331	STARTER	0.0005 microcuries	15025	18.5	9.5	18	1.83		
32024		425181P	FS-25 UNIV. EVERBRITE 250 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32025		425410P	FS-25 LEVITON 10 PK #000-13889	STARTER	0.0005 microcuries	1550	18.75	10	9.5	1.03		
32027		433021	FS-30 S (COP 30) 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32029		438270P	FS-12 LEVITON 10 PK #000-13885	STARTER	0.0005 microcuries	1100	0	0	0	0		
32030		441030	FS-40/400 GE	STARTER	0.0005 microcuries	0	0	0	0	0		
32031		445410	FS-4NA LEVITON 10/PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32032		445520	FS-40/400A (FS-4NA) SYL. 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32033		445521	FS-40/400A (FS-4NA) SLI 10 PK	STARTER	0.0005 microcuries	0	18.25	10	9.5	1		
32034		446501	FS-2NA SLI 10 PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32035		465010	FS64NAHUBBELL	STARTER	0.0005 microcuries	0	0	0	0	0		
32036		468101	FS-85 (FS-6) SLI	STARTER	0.0005 microcuries	0	0	0	0	0		
32037		468141	FS-85-4 (FS-64) SLI	STARTER	0.0005 microcuries	0	0	0	0	0		
32038		484130	GB-44 BLUE GLOBOTTLE replace w	STARTER	0.0005 microcuries	0	0	0	0	1.56		
32039		49113	FS-2C EVERBRITE UNIVERSAL	STARTER	0.0005 microcuries	0	0	0	0	0		
32040		49121	FS-2X ON GUARD 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32041		49202	FS-4 DURA BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
32042		49224	FS-4X GAMPAK BULK	STARTER	0.0005 microcuries	0	8.5	9	16.5	0.73		
32043		49315	FS-5C #166402/19940	STARTER	0.0005 microcuries	0	0	0	0	0		

Addendum C -- starters

Short	WH	Long product cd	Part description	Lamp type	kr85	On hand	length	width	height	cu ft	Item UPC code	Ctn UPC code
32044		49400	FS-12 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32046		49402	FS-12 DURA BULK	STARTER	0.0005 microcuries	0	0	0	0	0		
32048		49421	FS-12X ON GUARD 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32049		49500	FS-22 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32050		49501	FS-22 DURA 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32051		49511	FS-22C ON GUARD 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32052		49600	FS-25 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32053		49670	FS-8 DURA	STARTER	0.0005 microcuries	0	0	0	0	0		
32054		49700	FS-85 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32055		49710	FS85-4 DURA	STARTER	0.0005 microcuries	0	0	0	0	0		
32056		49835	FS-40 DURA	STARTER	0.0005 microcuries	0	0	0	0	0		
32057		49836	FS-40 DURA 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32058		49856	FS-40/400 GE	STARTER	0.0005 microcuries	0	0	0	0	0		
32059		49900	FS-850 DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32060		49906	FS-850 GE	STARTER	0.0005 microcuries	0	0	0	0	0		
32061		49910	FS-852 DURA	STARTER	0.0005 microcuries	0	0	0	0	0		
32062		49930	FS-2NA DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32063		49940	FS-2NA DURA 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32064		49960	FS-4NA DURA 25PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32065		49970	FS-85NA DURA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32093		438120P	FS-12 SYLVANIA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32123		4220012-CR	ASSY-22TB/P GLOBOTTLE ASSY	STARTER	0.0005 microcuries	0	0	0	0	0		
32144		4822360-66	GB-22E GLOWBOTTLE/CUT LEADS	STARTER	0.0005 microcuries	0	0	0	0	0		
32148		423020-66	FS-20(COP-20)SYLVANIA 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32198		4413600-66	FS-40 HUB BULK STARTERS 1000PK	STARTER	0.0005 microcuries	0	0	0	0	0		
32217		4230300-CR	COP 20 UNETCHED 10PK	STARTER	0.0005 microcuries	0	10.75	10.75	16	1.07		
35025		35025-65	PBS-25 STARTER 10PK	STARTER	0.0005 microcuries	1900	8.5	1.38	0.78	0.01		
35100		35100-65	PBS-100 STARTER 10PK	STARTER	0.0005 microcuries	2350	0	0	0	0		
35160		35160-65	PBS-160 STARTER	STARTER	0.0005 microcuries	5870	0	0	0	0		
81220		4281220-67	FS2 METAL STARTER 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
81220 RF		4281220-RF67	FS2 METAL STARTER 10PK	STARTER	0.0005 microcuries	0	0	0	0	0		
90001		9VFS4P-SLI	FS4 STARTER (per) 2 PACK	FS4 STARTER	0.0005 microcuries	35	4.75	5.75	6.25	0.1	006-64608-90001-0	600-64608-90001-0
90001 NJ		448210P-NJ	FS4 STARTER (per) 2 PACK	FS4 STARTER	0.0005 microcuries	160	4.75	5.75	6.25	0.1	006-64608-90001-0	600-64608-90001-0
90004		428210P	FS2 STARTER 1 000 PACK	STARTER	0.0005 microcuries	19000	11	10.75	16	1.09		
90005		448210P	FS4 STARTER 1 000 PACK	STARTER	0.0005 microcuries	96000	11	10.75	16	1.09		
90005 NJ		9VFS4B-NJSLI	FS4 STARTER 1 000 PACK	STARTER	0.0005 microcuries	0	11	10.75	16	1.09		
90006		458171P	FS5 STARTER 1 000 PACK	STARTER	0.0005 microcuries	8000	11	10.75	16	1.09		
90009		425170P	FS25 STARTER 1 000 PACK	STARTER	0.0005 microcuries	10000	0	0	0	0		

total starters

855,877

Total microcuries

427.94 microcuries

Request - J

December 17, 2008

Mail Control No. 022721

SLi Lighting Products, Inc.
ATTN: Mr. Kevin J. Bonawitz
122 East Laurel St.
Mullins, SC 29575

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT DISTRIBUTION LICENSE

Dear Mr. Bonawitz:

This refers to your Application for Material License, NRC Form 313, dated September 9, 2008. We do not have sufficient information to complete the review of your application. In order to continue our review we ask that you provide the following additional information:

In order to possess and use byproduct material (i.e., radioactive material such as krypton-85), you must first satisfy the general requirements of 10 CFR 30.33. This regulation in essence requires you to apply for and obtain a specific license authorizing possession and use of radioactive material from the State of South Carolina. Please provide us with a copy of your State of South Carolina Possession and Use license.

If any of the documents you have supplied is intended to meet the requirements of Title 10, Code of Federal Regulations, Part 32, described below, please explain their relevance in your response. You should clearly indicate how any document or portion thereof relates to each of the requirements.

The requirements generally pertain to individual product models. You should indicate in your response whether any of the models are part of a design series, in which case the questions below may be answered for the series rather than the individual models. However, please indicate the models belonging to each series, and explain how they differ.

1) Title 10, Code of Federal Regulations, Section 32.14(b)(1) requires details of the chemical and physical form and maximum quantity of byproduct material in each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. It was noted that in response to Item 5 on NRC Form 313 the number "0.0005," without units, was provided for two product types, while no quantity was provided for other product types. Please provide this information for each model that you would like to distribute. **Attached are addendums A, B and C. This is information given to the NRC group in Phila. as well. It shows the max amount of KR 85 used in each sku.**

2) Title 10, Code of Federal Regulations, Section 32.14(b)(2) requires details of construction and design of each product. Your application dated September 22, 2008, with Enclosures, and email dated November 26, 2008, did not appear to address this requirement. Please provide this information for each model that you would like to distribute. **The items SLi is applying for are a series of HID, compact fluorescent lamps and starters. Attached are representative specifications for these sub product groups.**

3) Title 10, Code of Federal Regulations, Section 32.14(b)(3) requires that the method of containment or binding of the radioactive byproduct material in the product be described. Please provide the method of containment or binding of the radioactive byproduct material in the product. **The products described are lamps which are sealed by press methods or lazars. None of the filler gases can leak out of the lamp unless it is handled inappropriately. (dropped)**

4) Title 10, Code of Federal Regulations, Section 32.14(b)(4) requires procedures for and results of prototype testing to demonstrate that the byproduct material will not become detached from the product and that the byproduct material will not be released to the environment under the most severe conditions to be encountered in normal use of the product. Please provide these procedures and describe the prototype testing performed on the product. **See lamp testing procedures in the attachments**

5) Title 10, Code of Federal Regulations, Section 32.14(b)(5) requires that quality control procedures be followed in the fabrication of production lots of the product and a description of the quality standards the product will be required to meet. Please describe the quality control procedures to be followed in the fabrication of production lots of the product and provide a description of the quality standards the product will be required to meet. **Same as #4.**

6) Title 10, Code of Federal Regulations, Section 32.14(b)(6) requires a description of the proposed method of labeling or marking each unit and its container with the identification of the manufacturer or initial transferor of the product and the byproduct material in the product. An attachment (nrc_label.jpg) to your email of November 26, 2008 provided a copy of a label for one model of lamp, but the relationship of this label to any of the several lamp types / models listed in another attachment (nrc metal halide bom 252.rtf) is not clear. Please indicate to which model or series this label applies. If labels for all models / series are substantially the same, this should be clearly indicated in your response. Note: For those products requiring labeling, NRC's policy is that the smallest item distributed must display the required label. If this is not possible, then the label should be placed as close as possible to the product. For example, if an electron tube is too small to label, then the label should be placed on the next smallest container, such as the bubble pack containing the electron tube. **Every lamp inner carton has the KR85 label. We also label the outer carton as well. Attached are samples of the labels.**

7) Title 10, Code of Federal Regulations, Section 32.14(c) requires that each product will contain no more than the quantity of byproduct material specified for that product in '30.15. Please provide the quantity of byproduct material specified for your product. **Same as question #1. See addendum A, B, and C.**

8) Title 10, Code of Federal Regulations, Section 32.14(d)(1) requires that the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. Please describe how the byproduct material is properly contained in the product under the most severe conditions that are likely to be encountered in normal use and handling. **The items in question are lightbulbs. Lightbulbs are sealed by press and lazar methods so none of the filler gases can release. The KR85 is properly contained and will not release with normal use and handling.**

9) Title 10, Code of Federal Regulations, Section 32.15(a)(1) requires that each person licensed under '32.14 shall maintain quality assurance practices in the manufacture of the

part or product, or the installation of the part into the product. Please describe your quality assurance practices in the manufacture of the part or product, or the installation of the part into the product. **This is also covered by the attachments in our answers to questions 4 + 5.**

10) Title 10, Code of Federal Regulations, Section 32.15(a)(3) requires that each person licensed under '32.14 shall visually inspect each unit in inspection lots. Any unit that has an observable physical defect that could affect containment of the byproduct material shall be considered as a defective unit. Please describe how you shall visually inspect each unit in inspection lots for defects. **Same as question 9.**

11) Title 10, Code of Federal Regulations, Section 32.15(c) requires that no person licensed under '32.14 shall transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under '30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. **I am in charge of R+D and quality for Sylvania in the America's. All defective lamps returned by US cusotomers are reviewed.**

If we do not receive your reply within 30 calendar days from the date of this letter, we will consider your application as having been abandoned by you. This action would be without prejudice to the resubmission of another application with the required information. In accordance with 10 CFR 2.390 of NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in NRC's Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/NRC/ADAMS/index.html> (the Public Electronic Reading Room).

Any correspondence regarding your amendment application should reference the control number specified above.

If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs

Question - 11

December 17, 2008

Mail Control No. 022721

SLi Lighting Products, Inc.
ATTN: Mr. Kevin J. Bonawitz
122 East Laurel St.
Mullins, SC 29575

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION - APPLICATION FOR EXEMPT DISTRIBUTION LICENSE

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If you have any questions, please feel free to contact me at (301) 415-5477 or electronic mail: richard.struckmeyer@nrc.gov.

Sincerely,

/RA/

Richard K. Struckmeyer, Health Physicist
Division of Materials Safety and
State Agreements
Office of Federal and State Materials and
Environmental Management Programs