



**UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET SW SUITE 23T85
ATLANTA, GEORGIA 30303-8931**

November 15, 2002

CAL No. 02-02-005

Kochan Consulting Group, Inc.
d/b/a SurvivalKeychain.com
ATTN: David Kochan
President
2895 Olde Town Park Drive
Norcross, GA 30071

SUBJECT: CONFIRMATORY ACTION LETTER

Dear Mr. Kochan

This letter is based on a special joint inspection conducted on November 13, 2002, by representatives of the Nuclear Regulatory Commission (NRC) and the Georgia Environmental Protection Division's Radioactive Materials Program in your Norcross, GA home. The purpose of the inspection was limited to reviewing your possession and distribution of licensed radioactive material. The initial finding of the inspection indicated that you imported and possessed GlowRing devices without the required license from the State of Georgia. Each of the GlowRing devices contain about 460 millicuries (mCi) of hydrogen 3 (^3H), also known as tritium. It was further determined that you distributed 17 of these devices to other unlicensed persons without the required distribution license from either the State of Georgia or the NRC.

Pursuant to conversations between you and Mr. John Pelchat of this office, held on November 13 and 15, 2002, it is our understanding that you have taken (or will take) the following actions (which will be completed by the dates specified):

1. As of November 13, 2002, you will discontinue the sale or distribution of the GlowRing devices.
2. As of November 14, 2002, you will remove references to the GlowRing devices from the the SurvivalKeychain.com website.
3. Within 10 days of your receipt of this letter, you will notify each of your customers that the GlowRing devices that they have received contain radioactive material that was inappropriately distributed and inform them that they may return the devices to you if they wish.
4. Within 10 days of your receipt of this letter, you will begin negotiations with Traser UK Ltd., the device manufacturer, to make arrangements to return the GlowRing devices in your possession.

5. Upon successful completion of the transfer of the devices to the manufacturer, you will provide the NRC with a written copy of a letter from Traser UK Ltd. acknowledging the receipt of the devices that you currently have in your possession.

Pursuant to Section 182 of the Atomic Energy Act, 42 U.S.C. 2232, you are required to:

- 1) Notify me immediately if your understanding differs from that set forth above;
- 2) Notify me if for any reason you cannot complete the actions within the specified schedule and advise me in writing of your modified schedule in advance of the change; and
- 3) Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of the licensee; nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

In accordance with 10 CFR 2.790 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/reading-rm/ADAMS.html> (the Public Electronic Reading Room).

Sincerely,

/RA/

Douglas M. Collins, Director
 Division of Nuclear Materials Safety

Docket No. 99990002
 License No. N/A Non-licensee

OFFICE	RII:DNMS	RII:DNMS	RII:EICS				
SIGNATURE	JMP 11/15/02	JMP 11/15/02	CFE 11/15/02	NMSS 11/14/02			
NAME	JMPelchat	JLHenson	CFEvans				
DATE	11/ /2002	11/ /2002	11/ /2002	11/ /2002	11/ /2002	11/ /2002	11/ /2002
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO
PUBLIC DOCUMENT	YES NO						

