# Region I NMSS Licensee Event Report

	Licensee	AT&T Corp. Basking Ridge, NJ Lost Generally Licensed Tritium (H-3) Exit Signs					
E	vent Description						
e#	MA	Docket #	NA	MLER-RI 2002- 07			
Date	1/2002	Report Date	9/6/02				
REP	ORTING REQUIR	EMENT					
XX	10 CFR 20.2201	Theft or Loss		10 CFR 35.33 Misadministration			
	10 CFR 20.2203	30 Day Report		License Condition			
	10 CFR 30.50 R	eport					
	] Other						
REG	ION I RESPONSE						
	] Immediate Site	Inspection	Inspector/Date				
1.4	Special Inspecti	on	Inspector/Date				
	Telephone Inqui	iry	Insp	pector/Date			
	Preliminary Rep	ort		Daily Report			
XX	Information Ente	ered in RI Log		Review at next inspection			
	Report referred	to:					
REF	PORT EVALUATIO	N					
	Description of E	vent	Correctiv	e Actions			
	Levels of RAM I	nvolved	Calculatio	ons Adequate			
	Cause of Event		Additiona	I Information Requested from Licens			
SPE	CIAL INSTRUCT	ONS OR COMMEN	TS				

Public		Non-Public	: :	
	Initials/Date			Initials/Date
Completed by:	S.T. "	1 15/2002	Date	St 11/15/02
Reviewed by:	Solith		Date	11/19/201
Location of File: G:\LA	SILER FORM REV A.wpd			



Environment, Health & Safety

Kimberly A. Kantner, NRRPT From: Radiation Safety Program Office 14008 St. Leo Court Orlando, FL 32826 407/277-1641 (Voice) 407/277-9931 (Fax)

Hia / USNRC Date: 9/0 To: Telephone No.: <u>610-337-5304</u>

34

Facsimile No.: 610 337 - 5393

Number of Pages (including Cover Page):

**Comments:** Status ec. Vaques S



14008 St. Leo Court Orlando, FL 32826 407 277-1641 FAX 407 277-9931 Page 800 258-0000 - Pin 258740 kkanther @att.com

Kimberly A. Kantner, RRPT Radiation Safety Consultant Environment, Health & Safety

September 26, 2002

John Kinneman, Branch Chief Materials Licensing U. S. Nuclear Regulatory Commission, Region 1 475 Allendale Road King of Prussia, PA 19406

#### **GENERALLY LICENSED TRITIUM (H-3) EXIT SIGNS**

As requested by Stephanie Tullio of your office on September 6, 2002, the following information is provided for review and determination of further actions:

Site Location: AT&T Corp., 295 N. Maple Ave., Basking Ridge, NJ 07921

Summary: As part of AT&T's routine activities associated with the sale of the above property location, the subject items were being removed from the facility for disposal prior to ownership transfer. When facility personnel reviewed an earlier inventory record listing 14 devices total, only two (2) were located and three (3) additional devices were discovered at this facility (reflected in the attached inventory update). Facility personnel recall these remaining 12 devices were previously removed for disposal and part of a larger shipment (15 total) that occurred in January, 2002. However, these devices were not clearly documented as being packaged for shipment or received by an authorized facility.

Following an internal investigation, it was determined that these devices were processed through AT&T's Resource Recovery Center, which is operated by third-party vendor 3E Company (1905 Aston Ave., Carlsbad, CA 92008). The shipping documentation for disposal (dated January 17, 2002) indicates a 55-gal drum of scrap electronics was shipped to Lighting Resources, Inc. (498 Park 800 Drive, Greenwood, IN 46143). Lighting Resources, Inc. acknowledges receiving this shipment on January 21, 2002 but that it contained "non-radioactive" exit signs that were de-manufactured and separated for further recycling. However, an itemized receipt record (i.e., make, model, serial no., etc.) of those exit signs is unavailable from Lighting Resources, Inc.

AT&T facility personnel maintain that 15 tritium exit signs were included in this shipment to Lighting Resources, Inc. Although specific model/serial numbers were not recorded at that time, the remaining 12 exit signs are no longer installed in the specified locations documented on the inventory. In noting a difference of three (3) devices, the total aggregate quantity (adjusted for decay) of tritium (H-3 gaseous) may be conservatively approximated as 90.6 Curies (Ci) (see attached inventory).

AT&T Corp. Basking Ridge, NJ 09/26/02 3/ 4

#### **Actions Taken:**

AT&T personnel have secured the remaining five (5) devices to ensure that they will not be removed and disposed without proper authorization. Subsequent transfer of these devices will be closely monitored to ensure proper accountability and transfer to an authorized (licensed) facility.

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On behalf of AT&T, 3E Company notified Lighting Resources, Inc. of the potential receipt of these tritiumexit signs at their facility and requested a copy of their internal procedure for incidental receipt and handling of tritium-exit signs. Lighting Resources, Inc. replies (dated June 20, 2002 and July 28, 2002) and procedures were forwarded to Stephanie Tullio via fax on 09/03/02.

In addition, this office conducted a review of AT&T internal procedures to ensure that all necessary measures are properly implemented to minimize future occurrences, including emphasis on USNRC notification of such device transfers (10 CFR § 31.5). As a result, 3E Company and AT&T/EH&S-Radiation Safety Program have instituted procedural changes to include a formal notification and approval process for disposal requests involving any (radioactive and non-radioactive) exit signs.

If you have any additional questions regarding this matter, please contact me directly at 407 277-1641.

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#### Kimberly A. Kantner, RRIT

Kimberly A. Kantner, RRPT

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## AT&T Corp. Basking Ridge, NJ 09/26/02

Item	Make	Model	S/N	Activity	Location	Manu. Date	Status
1	Isolite Exit	2040	A55534	7.5 Ci – H3	4 Lobby P1	May - 1995	Removed from service in 07/01
2	Isolite Exit	2040	A55538	7.5 Ci – H3	4 Lobby P1	May - 1995	Removed from service in 07/01
3	Isolite Exit	2040	A04951	9.0 Ci – H3	St.16 A+12	April – 1990	Removed from service in 07/01
4	Isolite Exit	2040	A55596	7.5 Ci – H3	4-4 Phase 1	May - 1995	Removed from service in 07/01
5	Isolite Exit	2040	A55608	7.5 Ci – H3	4-4 Phase 2	May - 1995	Removed from service in 07/01
6	Isolite Exit	2040	A55598	7.5 Ci – H3	4-3 Phase 2	May - 1995	Removed from service in 07/01
7	Isolite Exit	2040	A55594	7.5 Ci – H3	4-3 Phase 1	May - 1995	Removed from service in 07/01
8	Isolite Exit	2040	A55597	7.5 Ci – H3	4-2 Phase 1	May - 1995	Removed from service in 07/01
9	Isolite Exit	2040	A55595	7.5 Ci – H3	4-2 Phase 2	May - 1995	Removed from service in 07/01
10	Isolite Exit	2040	DGN1039	15 Ci – H3	Jockey Hollow	Nov - 1986	Removed from service in 07/01
11	Isolite Exit	2040	DGN1037	15 Ci – H3	Jockey Hollow	Nov - 1986	Removed from service in 07/01
12	Saunders-Roe Exit	Safety 10	ST23391	21 Ci – H3	4A76C3	Feb - 1985	Noted in 1999 as held for disposal
				for decay (Jan.			
*13- 15	Unknown		ssumed as Item ecay (Jan. 2002)	12 above, then 90	0.6 Ci Total –		· · · · · · · · · · · · · · · · · · ·
Devic	es Removed from	Service/Secure	ed Pending D	  isposal			
1	Isolite Exit	2040	DGN1025	15 Ci – H3	Storage Room	Nov - 1986	Removed from service in 06/02; Pending Disposal
2	lsolite Exit	2040	DGN1024	15 Ci – H3	Medical	Jan - 1986	Removed from service in 06/02; Pending Disposal
3	lsolite Exit	2040	A55536	7.5 Ci – H3	4a Café South	May - 1995	Removed from service in 06/02; Pending Disposal
4	Isolite Exit	2040	A55537	7.5 Ci – H3	4a Café South	May - 1995	Removed from service 06/02; Pending Disposal
5	lsolite Exit	2040	A55535	15 Ci – H3	Unknown	May – 1995	Removed from service 08/02; Pending Disposal (NOTE: Indicated as received, by manufacturer/supplier records, in 01/96).

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Environment, Health & Safety

From: Kimberly A. Kantner, NRRPT Radiation Safety Program Office 14008 St. Leo Court Orlando, FL 32826 407/277-1641 (Voice) 407/277-9931 (Fax)

nanie Tullio (NRC) Date: 9/3/02 To:

Telephone No.: \_\_\_\_\_

Facsimile No.: 610-337-5393

Number of Pages (including Cover Page): 13

ted ! Enclosed Comments: as requ 25 nventory listing Pa ( ) Correspondence: Lighting Resources June 20, 2002 (1Pg) 2002 (2 Pas. June 28 dfd. July 3. 2002 3 Pas. QA Poli site (5Pas.) panded Shipping information 64 521

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liem	Make	Model	S/N	Activity	Location	Manu. Date	Status	
1	Isolite Exit	2040	A55534	7.5 Ci - H3	4 Lobby P1	May - 1995	Removed 07/01	
2	Isolite Exit	2040	A55538	7.5 Ci-H3	4 Lobby Pl	May - 1995	Removed 07/01	, ,
3	Isolite Exit	2040	A04951	9.0 Ci - H3	St.16 A+12	Apcil - 1990	Removed 07/01	
4	Isolite Exit	2040	A55596	7.5 Ci - H3	4-4 Phase 1	May - 1995	Reinoved 07/01	Be lieved to be included be included with this shipned
5	Isolite Exit	2040	A55608	7.5 Ci - H3	4-4 Phase 2	May - 1995	Removed 07/01	The to
6	Isolite Exit	2040	A55598	7.5 Ci - H3	4-3 Phase 2	May - 1995	Removed 07/01	Bellever, and
7	Isolite Exit	2040	A55594	7.5 Ci - H3	4-3 Phase 1	May - 1995	Removed 07/01	include (invent
8	Isolite Exit	2040	A55597	7.5 Ci - H3	4-2 Phase 1	May - 1995	Removed 07/01	be this 3ng
9	Isulite Exit	2040	A55595	7.5 Ci - H3	4-2 Phase 2	May - 1995	Removed 07/01	the the
10	Isolite Exit	2040	DGN1039	15 Ci - 113	Jockey Hollow	Nov - 1986	Removed 07/01	
	Isolite Exit	2040	DGN1037	15 Ci - H3	Jockey Hollow	Nov - 1986	Removed 07/01	
12	Isolite Exit	2040	A55535	ISCi-II3	Unknown	May-1995	Indicated by manufacturer/supplier records	
							as being shipped to facility in 01/96.	
13	Saunders-Roe Exit	Safety 10	ST23391	21 Ci - H3	4A76C3	Fcb - 1985	Noted '99 as held for disposal	
								-
				81.6 Ci Total -	adjusted for decay			
				(Jan. 2002)				_
Device	s Removed/Secured Pend	ling Disposal						
1	Isolite Exit	2040	DGN1025	15 Ci - H3	Storage Room	Nov - 1986	Removed 06/02 - Pending Disposal	
2	Isolite Exit	2040	DGN1024	15 Ci - H3	Medical	Jan - 1986	Removed 06/02 - Pending Disposal	_
3	Isolite Exit	2040	ASSS36	1.5 Ci - H3	4a Café South	May - 1995	Removed 06/02 - Pending Disposal	
4	Isolite Exit	2040	A55537	7.5 Ci-H3	4a Café South	May - 1995	Removed 06/02 - Peuding Disposal	

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KIMBERLY KANTNER

PAGE 03

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LIGHTING RESOURCES, INC. 498 Park 800 Drive Greenwaxi, IN 46143

(317) 888-3889 | FAX (317) 888-3890

June 20, 2002

Mr. Jeff Kacirck AT&T 1905 Aston Ave. Suite 100 Carlsbad, CA 92008

Mr. Kacirek:

In reference to the exit signs generated from the AT&T facility located in Basking Ridge, NJ 07920, I would like to reiterate both the time line and method of recycling.

The exit signs were picked up at the Basking Ridge location on 1-18-02 via a LTL carrier These materials were then delivered at Lighting Resources, Inc (LRI) on 1-21-02 While at the LRI facility, the inaterials were domanufactured and properly separated for further recycling. The contents of the exit signs consisted of a small mekel cadmium battery, a small circuit board and the surrounding plastic cover. None of the contents were regarded as a hazardous waste. Approximately, 30 percent of the signs contained a five inch incandescent pentron lamp. This too, is a non-hazardous waste.

Because LR7 takes title to all waste accepted into the facility (explained in the attached certificate), the nickel cadmium batteries were commingled with other similar batteries on hand, and sent to an approved EPA sight for recycling. The circuit boards, as well as the plastics, were handled in a similar manner. The small lamps found in some of the exit signs were recycled here at our Greenwood, IN facility.

Should you have any further question or concerns, please do not besitute to contact me at 317-888-3889.

Sincerely,

Norman W. Ege National Accounts Menager Lighting Resources, Inc.

805 F. Francis Street Oniario, California 91761 (909) 923-7252 5481 Jet Port Industrial Blod. Tampa, Florida 33624 (813) 806-1888 1522 H. Victory Street, Suite #4 Phoenix, Arizana 85040 (602) 276-4278

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09/03/2002 11:19 4072779931 07/01/02 MON 06:49 FAX 6196770270 KIMBERLY KANTNER 3E COMPANY PAGE 04 چ2:001 دور 1/402

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## LIGHTING RESOURCES, INC.

498 Patk 800 Dive Greenwood, IN 46143 (317) 888-3889 : FAX (317) 888-3890

June 25, 2002

Mr. Icff Kacirek AT&T 1905 Aston Ave. Suite 100 Carlebad, CA 92008

Mr. Kacirek:

In reference to the exit signs generated from the AT&T facility located in Basking Ridge, NJ 07920, I would like to refterste both the time line and method of recycling, including the final destination sites of each component.

The exit signs were picked up at the Basking Ridge location on 1-18-02 via a LTL carrier. These materials were then delivered at Lighting Resources, Inc (LRI) on 1-21-02 While at the LRI facility, the materials were demanufactured and properly separated for further recycling. The contents of the exit signs consisted of a small nickel cadmium fattery, a small circuit board, a plastic face plate and the surrounding motals. None of the contents were regarded as a bazardous or radioactive waste. Approximately, 30 percent (8 total) of the signs contained a single, five inch incandescent pentron lamp. This too, is a non-bazardous waste.

Because LRI takes title to all waste accepted into the facility (explained in the attached certificate), the nickel cadmium batteries were commingled with other similar batteries on hand, and sent to Raw Materiala, located in Buffalo, NY. The circuit boards and plastics were sent to Commodity Management Services, an electronic recycler in Phoenix, AZ, where sent to Commodity Management Services, an electronic recycler in Phoenix, AZ, the surrounding metals were mixed with aluminum end caps generated during LRI's lamp recycling process and sent to Crossroad's Recycling in Franklin, IN. The small lamps found in some of the exit signs were recycled by Lighting Resources, Inc. at our found in some of the exit signs were recycled by Lighting location can be found en following attachment.)

During the demanufacturing process, there were no indications that the materials mentioned above were radioactive, or contained tritium. No warning labols or symbols were present on the exit signs, leaving no doubt that the materials were non-hezardous.

Should you have any further question or concerns, please do not hesitate to doublet me at 317-888-3889.

Sincerely,

Norman W. Ega - Lighting Resources, Inc.

805 E. Francia Street Ontaric: California 91761 (909) 923-7252 5481 Jet Port Industrial Bivd. Tampa, Florida 33624 (813) 805-1888 1522 E. Victory Street, Suite #4 Procents, Antroom 85040 (602) 276-4278

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85 2002 1522 E. Victory Succi, Sult: #4 Phoenix, Artzona 85040 (502) 275-4278 PAGE 2002/002 . KIMBERLY KANTNER . 5481 Jet Port Industrial Blvd. Tampa, Filorida 33624 (813) 806-1 888 Final Disposal Sites LIGHTING RESOURCES, INC. **3E COMPANY** Raw Mannials / International Marine Salvage 812 L. Ferry Street Unit #3 Buffalo, NY 14211 498 Park 800 Lot 9 Grossmood IN 46143 (317) 888-3830 FAX (317) 886-3830 Commodity Management Scrvices 2419 W. Vzn Buren Street Phoenix, AZ 85009 ÷ Lighting Resources, Inc. 498 Park 800 Dr. Creenwood, IN 46143 Crosspoad's Recycling 100 Eastview Drive Franklin, TN 46131 MON 06:50 FAX 6196770270 4872779931 805 E. Prancis Sucet Ontario. California 91761 (409) 522-7252 FAL 08/23/02 FUI 08:08 09/03/2002 11:19 . 07/01/02 :.

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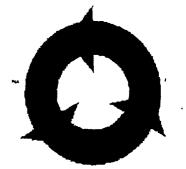
KIMBERLY KANTHER E COMPANY

PAGE 05 2001 No.0510 P. 1

JUL 3. 2002 SHITPH LIGHTING RESOURCES INC



Lighting Resources, Inc. 805 East Francis Ontario, CA 91761 909-923-7252 FAX 909-923-7510



## FAX/Memorandum

To:	Jeff Kacirek
FAX #	પોર્ક
Phone #	
From:	Daniel P. Gillespie
Phone:	909-923-3132 x14
Date:	July 3, 2002
Rø:	Incoming Materials Quality Assurance Inspection Policy

Per your request, a copy of our Incoming Materials policy is attached.

3 pages

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No.0512 P.1

JUL. 3. 2002 5:13PM LIGHTING RESOURCES INC

## Incoming Materials Quality Assurance Inspection policy

incoming materials must be inspected to assure they are acceptable to be received at this specific facility. The following steps must be taken for all incoming orders:

- 1. There must be a designated person that is responsible to assure incoming orders are conforming and properly accounted for on the receiving paperwork. (BOL or Haz-Waste Manifest). This designated person has the functional duty of a QA Manager, but this person would actually be the warehouse manager or other employee trained to handle this preceiving QA responsibility.
- 2. The QA Manager (or employee designated to handle this function) must examine the incoming materials and paperwork for each and every order. The following is required:
  - a. Examine the Shipping document (Bill OF Lading or Haz-Waste Manifest) to assure that it includes:
    - i. Only material that are permisted to be received at the facility
    - ii. Quantities or Weights
    - iii. Original Signature of the Generator and/or Transportor
    - iv. TSD signature
    - v. A receipt date
  - b. Examine all drums by opening them to assure they only contain materials that are permitted to be received, and are properly, described on the shipping Document.
  - c. Examine pallets of materials to assure they only contain materials that are permitted to be received, and are properly described on the BOL.
  - d. Verify the counts and/or weights to assure they are accurate. Since Incoming BOL's often only have estimated course / weights, the verified counts and weights need to be added to the TSD's copy of the BOL so that accounting will properly track this material. Also, if descriptions are missing or poorly described, then the QA manager must add notes to the TSD copy of the BOL to assure that is properly understood by eccounting.
  - e. Examine containers (drums) for visible damage that could cause a spill or leak & if damage is observed, then follow the policies that were written for that specific material. See S&E up 5 policy \$/15/01 page 3 for drums of Ballast and page 6 for Transformers. See S&E tab 4 policy dated \$/24/01, Appendix A-1, page 3 for batteries,

4072773331 09/03/2002 11:19 09/03/02 TUE 05:05 FAX 6196770270

LIGHTING RESOURCES INC Jul. S. 2002 5:19PM

- 3. When the QA Manager (or employee designated to handle this function) finds that materials do not conform due to permitting requirements, then this material must be rejected immediately. Rejection involves:
  - a. labeling this material as rejected. This must be very large print or a specially made label to increase visibility
  - b. Placing rejected drum/material in a warehouse area where it will not be inadvenently hundled or processed
  - c. Immediately communicate this situation to the facility manager
  - d. The facility manager needs to immediately contact the generator to
  - arrange return or possibly arrange for the material to be shipped to another facility that is permitted to receive this material (at the generators expense).
  - e. Follow up: This material needs to be yone within a week.
  - 4. If a material does not conform because it contains a contaminant that cause extra labor cost (i.e. sorting batteries or removing packaging peakuls from lamps, etc.) then the material is not to be automatically rejected, but instead the additional inbor/cost needs to be tracked and an up-charge will be applied to oustomers invoice as specified in their pricing contract. The QA Manager should note this on the production log.
  - 5. If a non-conforming material somehow makes it past this inspection, and is later discovered while staging for processing, etc., then the facility manager must be immediately putified upon discovery (assuming it is non-conforming due to permitting stipulations), and the facility manager in conjunction with the company compliance officer must, on a case by gave basis, determine the proper way to handle this. It must be understood that in some cases the regulatory agencies will need to be contacted and certain mutification and reporting will need to follow.

It is the responsibility of the facility manager to assure that only permitted materials are received at the facility, and that this QA Inspection procedure is in place to review incoming materials and assure they conform to permitting requirements, and then, incoming paperwork (Manifest and BOL's) are complete and accurate.

Policy offective date: Angust 200/1 Approved by

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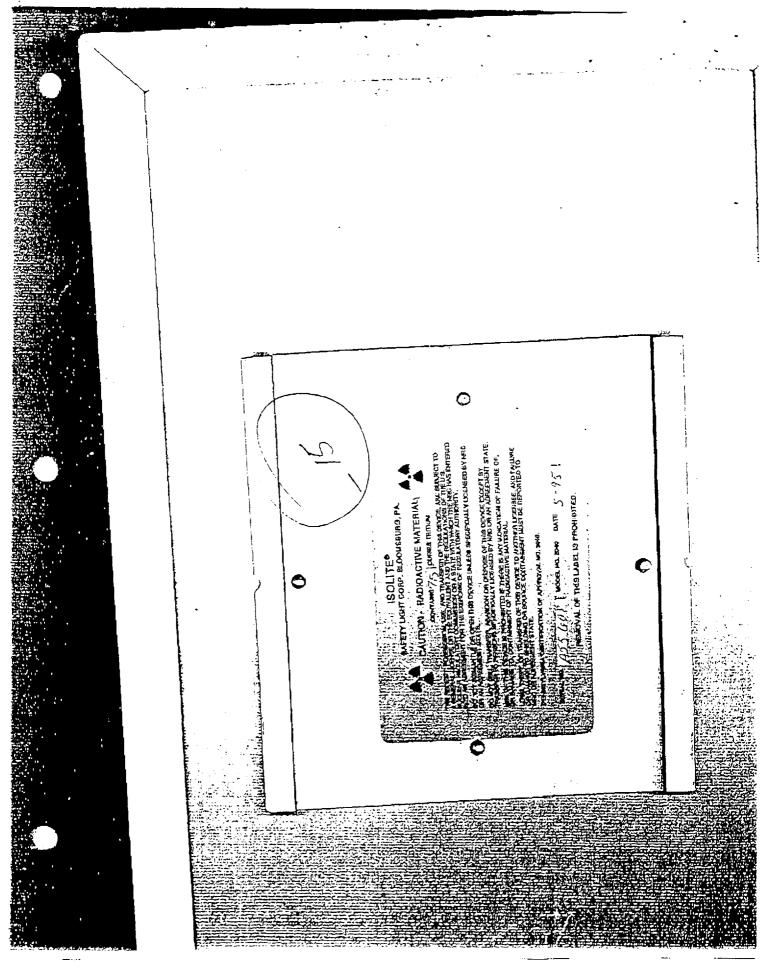
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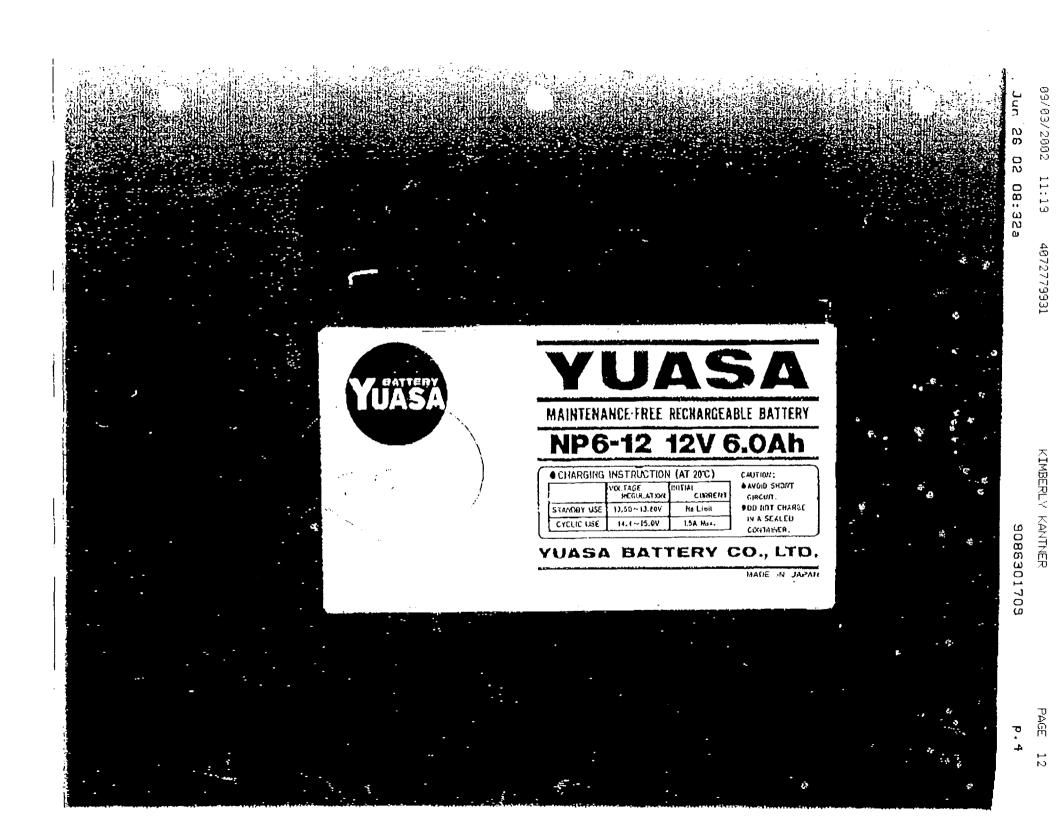
### KIMBERLY KANTNER

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In case of an omergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (809) 292-7172

### **Telephone Conversation Record**

Date: 9/3/2002 Time: 9 a.m. License #: General Licensee (AT&T) Person Calling: Stephanie Tullio Subject: Transfer of Tritium exit signs.

Jeff Kacirek - 3E, AT&T's hazardous waste contractor, (1-800-566-9347). They are brokers for AT&T. Jeff stated the signs were disposed of through Lighting Resources. 3E does not transfer any material.

Kim Kantner - AT&T, (407-277-1641) believes the exit signs were radioactive. Although the shipping papers to lighting Resources describe the shipment as a 5 gal steel drum of scrap metal for recycling.

Keith Anthill, Branch Manager for Lighting Resources was contacted, (317-888-3889) regarding AT&T's tritium exit signs, which were transferred to lighting resources from AT&T's waste contractor 3E. Keith stated the exit signs received from 3E were not radioactive and confirmed Lighting Resources procedures, findings and correspondence during disposal (attached). Their Q/A procedures were sent (attached).

TELEPHONE CONVERSATION RECORD	Date: July 15, 2002	<b>Time:</b> 09:25
Mail Control No.: N/A	License No.: General Licensee	Docket No.: 99990001
<b>Person Called:</b> Kim Kantor, AT&T EH&S, Technician	Licensee: AT & T	<b>Telephone No.:</b> 407-277-1641
Person Calling: Steven Courtemanche/(61	0) 337-5075	

Subject: Transfer of tritium exit signs.

<u>Summary</u>: Ms Kantor left voice mail messages for me about their tritium exit signs while I was out of the office July 1 - 14, 2002. I returned the call on July 15, 2002. She described her problem as follows:

The licensee disposed of 13 signs via its hazardous waste contractor 3E which she stated had a license to handle the transportation of radioactive material as waste. The contact for 3E is Jeff Kacirek (1-800-566-9347 Prompt 4). Personnel from AT&T as well as 3E remember reading plaques on the back of the signs indicating that the signs were made by Iso-Lite and contained tritium. 3E personnel took pictures of the plaques. Personnel from Lighting Resources, the vendor, out of Greenwood, Indiana came to package the sources in 55 gallon drums. The contact for Lighting Resources is Norman Ege at 317-888-3889. AT&T's records indicate that the barrels were loaded on 1/17/02 and received by Lighting Resources on 1/21/02. Personnel at Lighting Resources state that the barrel did not contain any radioactive material and the shipping manifest only indicates that the barrel contained scrap. Mr. Ege stated that they are not authorized to receive radioactive material and would transfer the radioactive material to Radiac for disposal if it inadvertently received some. Ms. Kantor stated that the manufacturer of the signs was Iso-Lite and the representative, Bill Rowan (610-647-8200) provided her with the serial numbers and activities of the signs provided to their facility. After accounting for decay, the signs contained a total of 97.8 Curies of activitiy. The licensee currently has four signs in storage awaiting disposal. Ms. Kantor stated that the signs would be returned to the manufacturer rather than the distributor. The signs were installed in the 1999 timeframe by Morristown Electric which is currently called Miller Wholesale (973-538-1600).

Action Required/Taken: Place into ADAMS.

Prepared by Steven Courtemanche

Date: July 15, 2002

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