



December 20, 2004

Mr. Samuel J. Collins,  
Regional Administrator  
US Nuclear Regulatory Commission Region 1  
475 Allendale Road  
King of Prussia, PA 19406

**Via electronic mail, Fax  
and US Postal Service**

Reference: Docket Nos. 030-05980  
030-05982  
License Nos. 37-00030-02  
37-00030-08  
EA-04-148  
Order Suspending License

Dear Mr. Collins,

As required by Section V (B) of the above referenced Order Suspending License, we hereby submit, for your approval, our plan for the orderly shutdown of our licensed activities at the Bloomsburg, Pennsylvania site.

1. Due to the contractual obligations to customers for the continuing supply of exit signs and light devices through 2005, including the supply of devices required for the fulfillment of national defense contracts, we request that we be allowed to continue to receive licensed material until January 31, 2005. This will provide us the opportunity to help our customers develop alternative means to fulfill their contracts. Nevertheless, no licensed material in the form of new light sources will be accepted after January 31, 2005.
2. We will continue to process existing inventory of NRC licensed material at the site into finished product for transfer to authorized recipients. Such processing will not extend past March 31, 2005 unless authorized by the NRC.
3. Any NRC-licensed material that remains in inventory at the site when processing ends will either be transferred to an authorized recipient or maintained in secure storage at the site. Any devices containing tritium that remain at the site beyond March 31, 2005 will be stored in the solid waste building. All leaking tubes and jars of foils, which are currently housed in the hoods in the processing building's fill room, will be placed into sealed containers before movement to the solid waste building. This building is kept locked and is considered to be secure.

The two existing fill rigs in the processing building will remain in place with the pyros intact. This room will remain secure.

4. We will make every effort to notify our customers that they may not return devices to our site. Such notification will be in the form of a letter to be sent to our customers no later than January 31, 2005.

Our operational procedures do not allow the return of any signs without prior authorization. If a customer desires to send a sign back to us, they must first obtain a Return Material Authorization (RMA) from us. This RMA, represented by an assigned number, must appear visibly on the outside of any / all returned packages. Without such authorization, any package can be refused. We will not authorize any RMAs for return of any signs after January 31, 2005.

Despite our efforts to notify our customers and our operational procedures outlined above, our experience leads us to believe that it is likely that devices will continue to arrive after our stated cut-off date. If so directed, we can refuse any packages and return them to their sender or we could accept the packages, process the material and transfer the licensed material to an authorized recipient. As we believe that it is in the best interest of the public, we request permission to continue to accept and process any such devices through March 31, 2005.

5. We will continue to provide security for NRC licensed material at the site.
6. We will continue to provide heat, electrical power, and other utility services. The stack and ductwork in the processing building and solid waste building will remain in place. Ideally, the stack and monitoring system should continue to operate in order to minimize the possibility of spreading contamination in the processing building or of a ground release from the solid waste building. However, without our 08 License in place, we are uncertain as to our ability to perform this function and therefore ask for your suggestions in this matter.

We believe that this plan addresses the requirements of the Order's Section V (B) 1-6. However, if any provision of this plan is considered to be inconsistent with the Order or other NRC requirements, such as 10 CFR 30.36(c)(1), we request your authorization to implement this plan to allow the shutdown of our licensed activities to be conducted in an orderly manner that allows adequate time for our customers to adjust to this shutdown without undue disruption of their activities.

Unfortunately, as you are well aware, unless our 08 license is renewed, our primary source of income will end and our future will be uncertain. Once activities under our 08 license are suspended, our ability to distribute devices containing NRC-licensed material under our 37-00030-09G and 10G distribution licenses will be adversely affected unless these licenses are amended to provide us the ability to distribute licensed devices produced by other manufacturers. Without such amendments, there will be a substantial risk that our revenue will not be sufficient to support

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continued provision of security and utilities to the site after the termination of production and transfer of SLC-produced devices. Consequently, we plan to contact your staff for advice on the requirements for such an amendment and to request that processing of the application for such amendment be expedited to minimize this risk.

Please contact me if you have any questions.

  
William E. Lynch Jr.  
Vice President



# Fax

**To:** Mr. Samuel Collins

**From:** Bill Lynch

**Fax:** 610-337-5269

**Date:** December 20, 2004

**Phone:** 610-337-5100

**Pages:** 4

**Re:** Plan for Orderly Shutdown as required by EA-04-148

**•Comments:**

This document has also been transmitted by e-mail to [sjc1@nrc.gov](mailto:sjc1@nrc.gov) and by US Postal Service.