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APRIL 26, 2005

~~BUSINESS CONFIDENTIAL TREATMENT REQUESTED~~

*Removed  
April 20,  
2007*

Ms. Janice Owens  
Export Controls & International  
Organizations Section  
Office of International Programs  
Room No. O4E21  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

**Re: Late-Filed Report of Nuclear Reactor Components Exported Under General License—10 C.F.R. §110.26(d)**

Dear Ms. Owens:

This letter is filed on behalf of Stanley Harrison Corporation ("Stanley Harrison"), a Delaware corporation with its headquarters in Burbank, California. Stanley Harrison is a wholly-owned subsidiary of Stanley Aviation Corporation ("SAC"), and was formed and commenced operations when SAC completed its acquisition of substantially all the business assets of the Harrison Division of Sierracin Corporation on November 28, 2003.

Attached hereto you will find our report, filed pursuant to 10 C.F.R. §110.26(d), concerning certain components (hydraulic seals) exported in calendar year 2004 by Stanley Harrison to AxFlow Holding AB ("AxFlow") in Sweden. (No items subject to NRC export licensing jurisdiction were exported by Stanley Harrison in 2003, following the date of the acquisition from Sierracin.) We have recently learned from AxFlow that the end-use of these exported components, which were manufactured in our Burbank, California facility, is in the control rod drive systems of nuclear power reactors in Sweden and Finland. Accordingly, we have now concluded that these seals, which according to AxFlow were specially designed in Sweden for nuclear plant use, are components described in paragraph (9) of Appendix A to Part 110, and that their export was subject to the general license in section 110.26(a).

**COBHAM**


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Prior to our conversation with a representative of AxFlow on March 29, 2005, in which we were informed of the exact end-use and design history of the subject components, we were not aware that their export was subject to NRC export control jurisdiction rather than that of the U.S. Department of Commerce. For that reason, Stanley Harrison did not file in a timely manner the report called for by section 110.26(d) with respect to the seals we exported to AxFlow in 2004. The attached report covers that time period. Since March 29, 2005, we have been in further contact with AxFlow to obtain the specific end-use information necessary for the attached report. For calendar year 2005 and beyond, to the extent we continue to export components that are subject to the general license in section 110.26(a), Stanley Harrison will file reports of its annual exports under that general license no later than February 1 of the succeeding year.

~~This letter and the attached report contain non-public business proprietary information the public disclosure of which could be harmful to Stanley Harrison's competitive position and should, therefore, not be disclosed to the public by the Commission or its staff without our express written consent.~~ Should you or your colleagues have questions concerning this letter or the accompanying report, please feel free to contact the undersigned or our attorney, Jay R. Kraemer of Fried, Frank, Harris, Shriver & Jacobson LLP in Washington, D.C. (telephone 202-639-7060). Thank you for your attention to this matter.

*Revised  
April  
20,  
2007*

Sincerely,

  
Jason A. Fenn  
President, Stanley Harrison Corporation

APPENDIX A  
 Stanley Harrison Corporation  
 Letter to Ms. Janice Owens  
 April 26, 2005

COMPONENTS SHIPPED UNDER NRC GENERAL LICENSE  
 (§110.26(e)) IN CALENDAR YEAR 2004 BY  
 STANLEY HARRISON CORPORATION

Part Number	Quantity	Appendix A Category	Date Shipped	Name of End User	Country of End-Use	Reactor	Intermediate Recipient (if any)
12195AG2125	19	(9)	March 31, 2004	Teollisuuden Voima Oy	Finland	TVO 1 and 2	None
12195AG3250	22	(9)	March 31, 2004	Teollisuuden Voima Oy	Finland	TVO 1 and 2	None
12195AG7375	14	(9)	March 31, 2004	Teollisuuden Voima Oy	Finland	TVO 1 and 2	None
12195AG8875	9	(9)	March 31, 2004	Teollisuuden Voima Oy	Finland	TVO 1 and 2	None
12195AG2125	70	(9)	April 30, 2004	OKG AB	Sweden	OKG1,OKG2, OKG3	None
12195AG3250	70	(9)	April 30, 2004	OKG AB	Sweden	OKG1,OKG2, OKG3	None
12195AG7375	15	(9)	April 30, 2004	OKG AB	Sweden	OKG1,OKG2, OKG3	None
12195AG8875	15	(9)	April 30, 2004	OKG AB	Sweden	OKG1,OKG2, OKG3	None
12195AG2125	25	(9)	April 30, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG3250	25	(9)	April 30, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG7375	31	(9)	April 30, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG8875	31	(9)	April 30, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG2125	19	(9)	May 14, 2004	Barsebäck	Sweden	Barsebäck* 2	Westinghouse Atom AB
12195AG3250	20	(9)	May 14, 2004	Barsebäck	Sweden	Barsebäck* 2	Westinghouse Atom AB
12195AG2125	25	(9)	June 9, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG3250	25	(9)	June 9, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG7375	25	(9)	June 9, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG8875	25	(9)	June 9, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG2125	20	(9)	October 27, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG3250	20	(9)	October 27, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG7375	12	(9)	October 27, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None
12195AG8875	13	(9)	October 27, 2004	Ringhals AB	Sweden	Ringhals 1,2,3 and 4	None

\* Barsebäck's Reactor 1 has been closed down permanently

All components subject to this report are seals utilized in nuclear power reactor control rod drive systems.

