

From: Elizabeth Ullrich  
Sent: Tuesday, September 02, 2008 2:48 PM  
To: Sebastien Amstutz  
Cc: Richard Struckmeyer  
Subject: RE: NRC's June 11 letter

Breitling USA, Inc.  
License Nos. 06-23863-01 and 06-23863-02E Docket Nos. 030-34689 and 030-34688 Control  
No. 142210 and 022669

Mr. Amstutz,

Thank you for your response.

Richard Struckmeyer, from our Headquarters office, will be renewing your distribution license (-02E).

I will be renewing your possession license (-01) from the Region I office.

sincerely,

Betsy

Betsy Ullrich, CHP  
Senior Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety  
US NRC Region 1 Office  
(610) 337-5040  
elizabeth.ullrich@nrc.gov

-----Original Message-----

From: Sebastien Amstutz [mailto:sebastien.amstutz@breitlingusa.com]  
Sent: Tuesday, September 02, 2008 2:47 PM  
To: Elizabeth Ullrich  
Subject: RE: NRC's June 11 letter

Dear Betsy,

Following our conversation of this morning, please renew our licenses.

Thanks and kind regards,

Sébastien

Sébastien Amstutz  
VP Finance and Administration

Breitling USA Inc.  
Hangar 7  
206, Danbury Road  
Wilton, CT 06897

USA

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E-mail : sebastien.amstutz@breitlingusa.com  
Check our website at www.breitling.com

-----Original Message-----

From: Elizabeth Ullrich [mailto:Elizabeth.Ullrich@nrc.gov]  
Sent: Thursday, August 28, 2008 7:17 AM  
To: Sebastien Amstutz; Richard Struckmeyer  
Subject: RE: NRC's June 11 letter

Mr. Amstutz,

The NRC requires that the initial importer/distributor of watches containing tritium to have a license from the NRC to "manufacture" and possess the watches. As the initial importer, you are the 'manufacturer' of record, responsible to ensure that the tritium watches you import are manufactured as described in your license application. You are also required to have a separate license (the exempt distribution license) in order to distribute the watches to other people who are not required to have an NRC license.

If you still possess watches containing tritium, and you intend to distribute these watches, then you need to renew the possession license and the exempt distribution license.

If you receive back tritium watches for repair, AND you replace parts with new tritium parts, then you also need to retain both licenses. This is because you would be distributing new tritium parts. It is my understanding, from your conversations with Lizette Roldan, that you are not using tritium replacement parts.

If you receive back tritium watches for repair but you replace parts with NON-tritium parts, then you do not need to retain the licenses for this activity only. Anyone can repair tritium watches, so long as replacement parts do not contain tritium.

If you want to terminate the manufacturing/possession license, you must distribute or return all the tritium watches currently in your possession.

I will be in the office today (Thursday 8/28) and tomorrow morning, although I have a conference call at 10 AM on Friday. I will return your call today.

Betsy  
Betsy Ullrich, CHP  
Senior Health Physicist  
Commercial and R&D Branch  
Division of Nuclear Materials Safety  
US NRC Region 1 Office

(610) 337-5040  
elizabeth.ullrich@nrc.gov

-----Original Message-----

From: Sebastien Amstutz [mailto:sebastien.amstutz@breitlingusa.com]  
Sent: Wednesday, August 27, 2008 9:52 PM  
To: Richard Struckmeyer  
Cc: Elizabeth Ullrich  
Subject: RE: NRC's June 11 letter

Dear Mr Struckmeyer,

We had a problem with our email system, reason why I am getting back to you today via email.

As per my voicemail message left yesterday to Mrs. Elizabeth Ullrich, I have found the letters sent to our attention and apologize not to have answered prior to you getting back to me.

As explained, Breitling USA is a watch distributor. We buy all watches to our mother company in Switzerland and distribute all Breitling watches on the US market.

As per various conversation I had with the NRC, our products do not carry any tritium since 1999 and we still have a very few watches in inventory that potentially have some tritium.

However, we repair watches in our workshop and the old watches that come for repair can potentially have hands and/or a dial with tritium.

The amount of tritium we carry is at a very low level, maybe even inexistant, reason why I would like to discuss with either you and/or Mrs. Ulrich in order to see if you have any advise for us.

I would appreciate you getting back to me.

Thanks and kind regards,

Sébastien Amstutz

Breitling USA Inc.

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<[http://www.busaemail.com:1884/exchweb/bin/redirect.asp?  
URL=http://www.breitling.com/](http://www.busaemail.com:1884/exchweb/bin/redirect.asp?URL=http://www.breitling.com/)>

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From: Richard Struckmeyer [mailto:Richard.Struckmeyer@nrc.gov]  
Sent: Mon 8/25/2008 4:05 PM  
To: Sebastien Amstutz  
Cc: Elizabeth Ullrich  
Subject: NRC's June 11 letter

Mr. Amstutz:

It has come to my attention that you did not receive the NRC Region I letter dated June 24, 2008, regarding License No. 06-23863-01, Docket No. 030-34689, Control No. 142210.

A similar letter was sent by the NRC Office of Federal and State Materials and Environmental Management Programs on June 11, 2008, regarding Exempt-Distribution License No. 06-23863-02E, Docket No. 030-34688, Control No. 0222669.

Please let me know whether you have received this letter.

Thank you,

Richard K. Struckmeyer  
State Agreements & Industrial Safety Branch Division of Materials Safety and State Agreements  
Office of Federal and State Materials and Environmental Management Programs

U.S. Nuclear Regulatory Commission

301-415-5477

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E-mail Properties  
Mail Envelope Properties ()

Subject: RE: NRC's June 11 letter  
Sent Date: 09/02/2008 2:43:35 PM  
Received Date: 09/02/2008 2:47:00 PM  
From: Elizabeth Ullrich

Created By: Elizabeth.Ullrich@nrc.gov

Recipients:  
sebastien.amstutz@breitlingusa.com (Sebastien Amstutz)  
Tracking Status: None  
Richard.Struckmeyer@nrc.gov (Richard Struckmeyer)  
Tracking Status: None

Post Office:

Files	Size	Date & Time
MESSAGE	13805	09/02/2008

Options  
Expiration Date:  
Priority: olImportanceNormal  
ReplyRequested: False  
Return Notification: False

Sensitivity: olNormal  
Recipients received: