

# mb-microtec

PO Box 1174  
mb-microtec (USA)  
North Tonawanda NY 14120-9174  
(716)694-2695

January 10, 2009

James P. Dwyer, Chief  
Commercial and R&D Branch  
Division of Nuclear Material Safety  
475 Allendale Road  
King Of Prussia, PA 19406-1415

Re: License # 31-23712-01E  
Docket: 03030433 Notice of violation / 2008001

Dear Mr. Dwyer:

I have recognized our [my] deficiencies in our reporting requirements and have supplied the missing reports to Mark Roberts via e-mail earlier this week 1-5-09. I have instituted corrective action with our accountant audit (Stephen Kling, CPA) to remind us of this reporting requirement at year end in addition to our IRS filing.

In response to your other questions:

1) Reason for violation.

Answer: My staff was not properly informed by me of the NRC requirement.

2) Corrective action.

Answer: Implement a required annual report the same time we do our year end accounting.


3) Corrective Steps.

Answer: Addressed under item (2).

4) Timing.

Answer: We are on-track to be in full compliance January, 2009.

Sincerely,

  
Lawrence Keating  
President

enc.

Materials Transfer Report(s) 2003-2007  
Inventory Report(s) 2003-2007

cc: Mark C. Roberts @ [mrc@nrc.gov](mailto:mrc@nrc.gov)

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REGION 1

NMSS/RGNI MATERIALS-004

# mb-microtec

PO Box 1174  
mb-microtec (USA)  
North Tonawanda NY 14120-9174  
(716)694-2695

January 6, 2009

Materials Safety & Inspection Branch  
Div. of Industrial & Mechanical Nuclear Safety  
Office of Nuclear Material Safety & Safeguards  
United States Nuclear Regulatory Commission  
Washington DC 20555-001

Re: Distributions of product under License No. 31-23712-01E

## Materials Transfer Report

Period	Watch Model	Total Units	Average Activity / Unit	Total Activity
1-01-03 through 12-31-03	100/1	33745	1.3907 Ci	1269.846 Ci
1-01-04 through 12-31-04	100/1	31020	2.3381 Ci	1220.6181 Ci
1-01-05 through 12-31-05	100/1	14103	1.314 Ci	517.948 Ci
1-01-06 through 12-31-06	100/1	2001	.175 Ci	50.025 Ci
1-01-07 through 12-31-07	100/1	7860	.625 Ci	201.0 Ci

No single timepiece exceeds 83 mCi.

Sincerely,

Lawrence Keating  
President

Watch Inventory - mb microtec USA 1-1-2007 thru 12-31-2007

Re: License No. 31-23712-01E

Invoice Date	Qty of Watches Rec'd	Average Activity/Unit	Ttl Curies / Activity	Date Received	Date Shipped	Balance on Hand
2/9/07	226	0.025	5.65	2/13/07	2/13/07	0
3/13/07	1377	0.025	34.425	3/21/07	3/21/07	0
5/10/07	310	0.025	7.75	5/16/07	5/16/07	0
5/16/07	414	0.025	10.35	5/21/07	5/21/07	0
6/18/07	500	0.025	12.5	6/26/07	6/26/07	0
7/1/07	150	0.025	3.75	7/5/07	7/5/07	0
8/16/07	500	0.025	12.5	8/20/07	8/20/07	0
8/16/07	252	0.025	6.3	8/20/07	8/20/07	0
8/21/07	300	0.025	7.5	8/23/07	8/23/07	0
9/1/07	194	0.025	4.85	9/5/07	9/5/07	0
10/4/07	20	0.025	5	10/9/07	10/9/07	0
1/4/07	440	0.025	11	10/10/07	10/10/07	0
11/1/07	250	0.025	6.25	11/2/07	11/2/07	0
11/3/07	356	0.025	8.9	11/6/07	11/6/07	0
11/5/07	72	0.025	1.8	11/6/07	11/6/07	0
11/9/07	370	0.025	9.25	11/13/07	11/13/07	0
11/13/07	119	0.025	2.975	11/20/07	11/20/07	0
11/20/07	450	0.025	11.25	11/23/07	11/23/07	0
11/26/07	25	0.025	0.625	11/28/07	11/28/07	0
12/1/07	450	0.025	11.25	12/4/07	12/4/07	0
12/1/07	26	0.025	0.65	12/4/07	12/4/07	0
12/15/07	297	0.025	7.425	12/18/07	12/18/07	0
12/15/07	13	0.025	0.325	12/18/07	12/18/07	0
12/17/07	469	0.025	11.725	12/19/07	12/19/07	0
12/23/07	280	0.025	7	12/27/07	12/27/07	0
<b>Totals</b>	<b>7860</b>	<b>0.625</b>	<b>201</b>			<b>0</b>

Watch Inventory - mb microtec USA 1-1-2006 thru 12-31-2006

Re: License No. 31-23712-01E

Invoice Date	Qty of Watches Rec'd	Average Activity/Unit	Ttl Curies / Activity	Date Received	Date Shipped	Balance on Hand
7/14/06	642	0.025	16.05	7/19/06	7/19/06	0
8/31/06	67	0.025	1.675	9/7/06	9/7/09	0
10/12/06	305	0.025	7.625	10/17/06	10/17/06	0
10/24/06	125	0.025	3.125	11/1/06	11/1/06	0
11/17/06	50	0.025	1.25	11/20/06	11/20/06	0
11/23/06	290	0.025	7.25	11/27/06	11/27/06	0
11/23/06	522	0.025	13.05	11/27/06	11/27/06	0
<b>Totals</b>	<b>2001</b>	<b>0.175</b>	<b>50.025</b>			<b>0</b>

Watch Inventory - mb microtec USA 1-1-2005 thru 12-31-2005

Re: License No. 31-23712-01E

Invoice Date	Qty of Watches Rec'd	Average Activity/ Unit	Ttl Curies / Activity	Date Received	Date Shipped	Balance on Hand
2/17/05	2219	0.041	90.979	2/23/05	2/23/05	0
2/17/05	90	0.027	2.43	2/23/05	2/23/05	0
3/9/05	300	0.025	7.5	3/15/05	3/15/05	0
3/24/05	1940	0.041	79.54	3/30/05	3/30/05	0
3/24/05	100	0.029	2.9	3/30/05	3/30/05	0
3/24/05	80	0.027	2.16	3/30/05	3/30/05	0
3/24/05	59	0.023	1.357	3/30/05	3/30/05	0
4/22/05	2005	0.041	82.205	4/30/05	4/30/05	0
4/22/05	100	0.029	2.9	4/30/05	4/30/05	0
4/22/05	80	0.027	2.16	4/30/05	4/30/05	0
5/26/05	445	0.041	18.245	6/2/05	6/2/05	0
5/26/05	150	0.039	5.85	6/2/05	6/2/05	0
5/26/05	40	0.029	1.16	6/2/05	6/2/05	0
5/26/05	95	0.027	2.565	6/2/05	6/2/05	0
5/26/05	150	0.023	3.45	6/2/05	6/2/05	0
6/9/05	772	0.025	19.3	6/21/05	6/21/05	0
6/20/05	120	0.027	3.24	6/28/05	6/28/05	0
6/20/05	150	0.023	3.45	6/28/05	6/28/05	0
6/20/05	435	0.041	17.835	6/28/05	6/28/05	0
6/20/05	200	0.039	7.8	6/28/05	6/28/05	0
6/20/05	25	0.029	0.725	6/28/05	6/28/05	0
6/23/05	250	0.025	6.25	7/6/05	7/6/05	0
7/8/05	100	0.041	4.1	7/21/05	7/21/05	0
7/15/05	490	0.041	20.09	7/22/05	7/22/05	0
7/15/05	50	0.039	1.95	7/22/05	7/22/05	0
7/15/05	380	0.029	11.02	7/22/05	7/22/05	0
8/21/05	485	0.041	19.885	8/25/05	8/25/05	0
8/21/05	125	0.039	4.875	8/25/05	8/25/05	0
8/21/05	150	0.029	4.35	8/25/05	8/25/05	0
8/21/05	150	0.027	4.05	8/25/05	8/25/05	0
9/26/05	87	0.025	2.175	10/4/05	10/4/05	0
11/3/05	14	0.025	3.675	11/11/05	11/11/05	0
11/3/05	711	0.041	29.151	11/11/05	11/11/05	0
11/3/05	50	0.039	1.95	11/11/05	11/11/05	0
11/3/05	50	0.029	1.45	11/11/05	11/11/05	0
11/3/05	150	0.027	4.05	11/11/05	11/11/05	0
11/3/05	75	0.023	1.725	11/11/05	11/11/05	0
11/17/05	200	0.025	5	11/25/05	11/25/05	0
12/1/05	536	0.041	21.976	12/9/05	12/9/05	0
12/1/05	125	0.027	3.375	12/9/05	12/9/05	0
12/1/05	75	0.023	1.725	12/9/05	12/9/05	0
12/2/05	295	0.025	7.375	12/13/05	12/13/05	0
<b>Totals</b>	<b>14103</b>	<b>1.314</b>	<b>517.948</b>			<b>0</b>

Watch Inventory - mb microtec USA 1-1-2004 thru 12-31-2004

Re: License No. 31-23712-01E

Invoice Date	Qty of Watches Rec'd	Average Activity/ Unit	Ttl Curies / Activity	Date Received	Date Shipped	Balance on Hand
2/13/04	295	0.0297	6.462	2/18/04	2/18/04	0
3/5/04	115	0.0196	2.254	3/10/04	3/10/04	0
3/5/04	50	0.0297	1.485	3/10/04	3/10/04	0
3/5/04	100	0.0196	1.96	3/10/04	3/10/04	0
3/5/04	4412	0.041	180.892	3/10/04	3/10/04	0
3/17/04	89	0.0396	3.54	3/24/04	3/24/04	0
3/17/04	93	0.0396	3.682	3/24/04	3/24/04	0
4/5/04	4175	0.041	171.175	4/13/04	4/13/04	0
4/5/04	50	0.039	1.95	4/13/04	4/13/04	0
4/5/04	25	0.029	0.725	4/13/04	4/13/04	0
4/5/04	200	0.027	5.4	4/13/04	4/13/04	0
4/5/04	175	0.023	4.025	4/13/04	4/13/04	0
4/8/04	44	0.0251	1.104	4/13/04	4/13/04	0
4/8/04	54	0.0297	1.604	4/13/04	4/13/04	0
4/30/04	179	0.0196	3.508	5/7/04	5/7/04	0
5/7/04	3350	0.041	137.35	5/11/04	5/11/04	0
5/7/04	350	0.039	13.65	5/11/04	5/11/04	0
5/7/04	413	0.027	11.15	5/11/04	5/11/04	0
5/7/04	150	0.023	3.45	5/11/04	5/11/04	0
5/17/04	5	0.025	0.125	5/24/04	5/24/04	0
5/17/04	45	0.039	1.782	5/24/04	5/24/04	0
5/17/04	50	0.0297	1.485	5/24/08	5/24/08	0
5/26/04	200	0.025	5	6/3/04	6/3/04	0
6/25/04	10	0.0196	0.196	6/30/04	6/30/04	0
6/25/04	10	0.0251	0.251	6/30/04	6/30/04	0
6/25/04	75	0.0196	1.47	6/30/04	6/30/04	0
6/25/04	20	0.0396	0.792	6/30/04	6/30/04	0
6/25/04	25	0.0396	0.99	6/30/04	6/30/04	0
6/25/04	50	0.0396	1.98	6/30/04	6/30/04	0
7/9/04	165	0.0335	5.534	7/13/04	7/13/04	0
7/9/04	150	0.0925	13.875	7/13/04	7/13/04	0
7/29/04	1375	0.041	56.375	8/6/04	8/6/04	0
8/16/04	500	0.025	12.5	8/23/04	8/23/04	0
8/19/04	1800	0.041	73.8	8/26/04	8/26/04	0
8/19/04	125	0.029	3.625	8/26/04	8/26/04	0
8/19/04	250	0.023	5.75	8/26/04	8/26/04	0
8/20/04	35	0.0196	0.686	8/26/04	8/26/04	0
8/20/04	80	0.0196	1.568	8/26/04	8/26/04	0
8/20/04	150	0.0925	13.875	8/26/04	8/26/04	0
8/20/04	45	0.0396	1.782	8/26/04	8/26/04	0
8/20/04	80	0.0396	3.168	8/26/04	8/26/04	0
9/5/04	239	0.0249	5.9511	9/14/04	9/14/04	0
9/5/04	250	0.038	9.5	9/14/04	9/14/04	0
9/5/04	150	0.095	13.875	9/14/04	9/14/04	0
9/5/04	125	0.0396	4.95	9/14/04	9/14/04	0
9/5/04	50	0.0297	1.45	9/14/04	9/14/04	0
9/5/04	20	0.025	0.5	9/14/04	9/14/04	0
9/5/04	16	0.0249	4.13	9/14/04	9/14/04	0
9/5/04	40	0.0925	3.7	9/14/04	9/14/04	0
9/17/04	160	0.0396	6.335	9/22/04	9/22/04	0
10/6/04	2502	0.041	102.582	10/14/04	10/14/04	0
10/6/04	125	0.029	3.625	10/14/04	10/14/04	0
10/6/04	80	0.023	1.84	10/14/04	10/14/04	0
10/27/04	875	0.041	35.875	11/4/04	11/4/04	0
10/27/04	175	0.039	6.825	11/4/04	11/4/04	0
10/27/04	246	0.029	7.134	11/4/04	11/4/04	0
10/27/04	150	0.027	4.05	11/4/04	11/4/04	0
10/27/04	150	0.023	3.45	11/4/04	11/4/04	0
11/5/04	899	0.041	36.859	11/11/04	11/11/04	0
11/12/04	1580	0.041	64.78	11/18/04	11/18/04	0
11/12/04	25	0.039	0.975	11/18/04	11/18/04	0
11/12/04	20	0.029	0.58	11/18/04	11/18/04	0
11/12/04	125	0.027	3.375	11/18/04	11/18/04	0
12/10/04	3103	0.041	127.223	12/14/04	12/14/04	0
12/10/04	101	0.029	2.929	12/14/04	12/14/04	0
12/10/04	100	0.027	2.7	12/14/04	12/14/04	0
12/10/04	150	0.023	3.45	12/14/04	12/14/04	0
<b>Totals</b>	<b>31020</b>	<b>2.3381</b>	<b>1220.6181</b>			<b>0</b>

Watch Inventory - mb microtec USA 1-1-2003 thru 12-31-2003

Ref: License No. 31-23712-01E

Invoice Date	Qty of Watches Rec'd	Average Activity/Unit	Ttl Curies / Activity	Date Received	Date Shipped	Balance on Hand
2/1/03	1100	0.041	45.1	2/6/03	2/6/03	0
2/6/03	231	0.041	9.47	2/6/03	2/6/03	0
2/20/03	2805	0.041	115.046	2/25/03	2/25/03	0
2/20/03	190	0.029	5.51	2/25/03	2/25/03	0
2/20/03	200	0.027	5.4	2/25/03	2/25/03	0
2/20/03	145	0.023	3.335	2/25/03	2/25/03	0
3/14/03	697	0.041	28.577	3/20/03	3/20/03	0
3/14/03	60	0.0297	1.782	3/20/03	3/20/03	0
3/21/03	2005	0.041	82.205	3/27/03	3/27/03	0
3/21/03	190	0.029	5.51	3/27/03	3/27/03	0
3/21/03	150	0.027	4.05	3/27/03	3/27/03	0
3/21/03	155	0.023	3.565	3/27/03	3/27/03	0
4/11/03	181	0.0196	3.547	4/17/08	4/17/08	0
4/16/03	3204	0.041	131.364	4/22/03	4/22/03	0
4/16/03	215	0.029	6.235	4/22/03	4/22/03	0
4/16/03	235	0.027	6.345	4/22/03	4/22/03	0
4/16/03	175	0.023	4.025	4/22/03	4/22/03	0
5/15/03	2770	0.041	113.57	5/22/03	5/22/03	0
5/15/03	225	0.029	6.525	5/22/03	5/22/03	0
5/15/03	285	0.027	7.695	5/22/03	5/22/03	0
5/15/03	175	0.023	4.025	5/22/03	5/22/03	0
5/23/03	246	0.0297	7.306	6/2/03	6/2/03	0
6/12/03	2295	0.041	94.095	6/18/03	6/18/03	0
6/12/03	160	0.027	4.32	6/18/03	6/18/03	0
6/12/03	195	0.023	4.485	6/18/03	6/18/03	0
6/27/03	175	0.0196	3.43	7/3/03	7/3/03	0
7/17/03	3985	0.041	163.385	7/24/03	7/24/03	0
7/17/03	690	0.029	20.01	7/24/03	7/24/03	0
7/17/03	245	0.027	6.615	7/24/03	7/24/03	0
7/17/03	195	0.023	4.485	7/24/03	7/24/03	0
8/19/03	224	0.0196	4.39	8/28/03	8/28/03	0
8/19/03	1850	0.041	75.85	8/28/03	8/28/03	0
8/19/03	140	0.023	3.22	8/28/03	8/28/03	0
8/19/03	70	0.029	2.03	8/28/03	8/28/03	0
8/19/03	310	0.027	8.37	8/28/03	8/28/03	0
9/19/03	3490	0.041	143.09	9/24/03	9/24/03	0
9/19/03	83	0.039	3.237	9/24/03	9/24/03	0
9/19/03	80	0.029	2.32	9/24/03	9/24/03	0
9/19/03	125	0.027	3.375	9/24/03	9/24/03	0
9/19/03	365	0.023	8.395	9/24/03	9/24/03	0
9/19/03	286	0.0196	5.605	9/24/03	9/24/03	0
10/17/03	1950	0.041	79.95	10/22/03	10/22/03	0
10/17/03	125	0.023	2.875	10/22/03	10/22/03	0
11/3/03	163	0.0196	3.194	11/6/03	11/6/03	0
11/14/03	150	0.0297	4.455	11/18/03	1/18/03	0
11/28/03	305	0.0196	5.978	12/3/03	12/3/03	0
12/3/03	450	0.027	12.5	12/12/03	12/12/03	0
<b>Totals</b>	<b>33745</b>	<b>1.3907</b>	<b>1269.846</b>			<b>0</b>