

Attachment A: Timeline of Key Activities and Events

- October 2000** The Wal-Mart Purchasing Team in Wal-Mart Realty, now known as Global Indirect Sourcing (GIS), purchases tritium exit signs (TES) at the direction of the then-engineer on the prototype design team. Apparent reasons for the switch to TES include the low energy and maintenance costs associated with their use. GIS orders over 70,000 signs from two suppliers, Isolite (approx. 2003 to 2007) and SRB Technologies (“SRB”) (2000 to 2003). Isolite agrees to handle disposal under its vendor agreement, and SRB allegedly agrees to the same.
- December 2000** The U.S. Nuclear Regulatory Commission (NRC) issues NUREG 1556, Volume 16, “Consolidated Guidance About Materials Licensees, Program-Specific Guidance About Licenses Authorizing Distribution to General Licensees.” This document includes guidance addressing both obligations for general licensees under 10 C.F.R. § 31.5, as well as on self-luminous exit signs.
- April 2004** Isolite visits the Wal-Mart Home Office to discuss the TES with the Environmental Compliance team, which is led by Safety Compliance and Facilities Maintenance. Isolite leaves written materials indicating that several states, such as Louisiana and Nebraska, require annual fees for installing TES. Isolite also provides some NRC-related regulations/guidance to Wal-Mart.
- May 2004** Isolite provides Wal-Mart’s lead Design Engineer with (1) NUREG-1556, Volume 16, Appendix L (guidance regarding self-luminous exit signs), (2) Isolite's Packaging / Handling Instructions for the Return of Damaged Self-Luminous Signs, (3) Isolite's Disposal Policy, and (4) Outlets for Tritium compiled by the CRCPD (Conference of Radiation Control Program Directors, Inc).
- Summer/
Fall 2005** Wal-Mart Licensing receives letters from the State of Nebraska requesting inventory report forms for Wal-Mart's 13 facilities in the state by December 31, 2005.
- Early 2006** Wal-Mart Licensing briefs limited Wal-Mart personnel regarding regulatory reporting requirements and circulates NUREG-1556 for information.
- Wal-Mart engages Shaw Environmental, Inc. to conduct inventories in Nebraska facilities.
- March 2006** State of Louisiana's Department of Environmental Quality (DEQ) inquires about signs at four Louisiana stores. No subsequent inventory is performed because DEQ is satisfied with Wal-Mart’s response.
- GIS communicates in a series of emails to several Walmart personnel that Wal-Mart will stop ordering TES beginning May 2006.

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- May 2006** State of Colorado's Radiation Control Program forwards annual inventory forms to individual stores in Colorado -- most with a June 30, 2006 reporting deadline. Colorado stores forward the correspondence to Facilities Maintenance. Wal-Mart engages Shaw Environmental, Inc., to conduct inventories in Colorado facilities.
- Wal-Mart begins the first in a chain of correspondence with Nebraska, correcting the state's current inventory numbers and identifies several typographical errors in serial numbers.
- June-July 2006** Shaw attempts to identify location of signs in Colorado (to support Colorado assessment of annual fees) with limited success.
- Shaw expands Colorado visits to facilities that did not purchase TES in attempt to find any missing TES.
- July-August 2006** Wal-Mart and Shaw visit the Isolite offices in Berwyn, Pennsylvania to review its shipping records to and from Wal-Mart facilities. Wal-Mart requests to visit SRB office, based in North Carolina, but SRB denies Wal-Mart's request.
- November 2006:** Wal-Mart and Shaw meet with Colorado to discuss final findings from inventory activities.
- Wal-Mart decides that a nationwide inventory search of facilities that purchased TES is required in order to meet the Agreement State and NRC reporting requirements. Shaw begins to develop the scope of its inventory work to include all remaining states by the end of 2008.
- December 2006** Wal-Mart sends a December 1, 2006, letter to Nebraska with a final report of 25 missing signs and an outline of steps taken by the company in its search for missing signs. Nebraska reported its final findings to the NRC before the end of the year.
- NRC issues Regulatory Issue Summary ("RIS") 2006-25, "Requirements for the Distribution and Possession of Tritium Exit Signs and the Requirements in 10 CFR 31.5 and 32.51a." RIS is addressed to "All U.S. Nuclear Regulatory Commission (NRC) licensees distributing tritium exit signs and those possessing a tritium exit sign under a general license."
- Early 2007** Wal-Mart becomes aware that 44 additional Wal-Mart stores and two additional Sam's Club stores received sign shipments from March 27, 2006 through January 5, 2007, despite GIS's March 2006 termination of purchase orders related to TES starting in May/June 2006.
- Summer 2007** Inventory results from Connecticut, Delaware, Massachusetts, Maryland, New York, Illinois, Indiana, New Jersey, Pennsylvania, Maine, New Hampshire, Ohio, Rhode island, Virginia, Washington

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and West Virginia continue to arrive from Shaw to Wal-Mart. Shaw confirms that there are several unoccupied stores and takeover stores containing TES. Internal communications occur within Wal-Mart regarding how to best handle such facilities. Shaw is directed to include these facilities in the list of stores to be inventoried going forward. Sam's Club Operations team determines it would like to pursue retrofits in order to remove all signs and replace them with non-tritium exit signs. Discussions begin on whether there is an acceptable non-wired option for Sam's Clubs and Wal-Mart Stores to pursue.

- December 2007** A meeting is held at Wal-Mart's Home Office to discuss the need to report to Agreement States and NRC about the results of the Shaw inventory to date. The magnitude and urgency of the situation are realized along with a clear understanding of TES regulations. Representatives from Environmental Compliance, Realty Compliance, Environmental Services, Legal and Operations attend. Wal-Mart and outside counsel begin development of nationwide TES Inventory Plan (TESIP) that includes all Wal-Mart facilities regardless if documentation showed TES were purchased.
- January 2008** Wal-Mart appoints a Radiation Safety Officer (RSO).
- February 2008** Wal-Mart begins placing calls to NRC management and certain Agreement States to inform them that it appears that not all of its TES can be accounted for, and to brief them on anticipated actions. Wal-Mart also begins submitting written reports of damaged and transferred TES to NRC and Agreement State regulators.
- Wal-Mart accelerates its inventory program and advances the due date for completion from the end of 2008 to mid-2008.
- April 2008** Wal-Mart determines that it will replace all TES with non-tritium exit signs in all Wal-Mart and Sam's Club locations. Shaw, with the assistance of electrical contractors and health physicists, when necessary, begins the nationwide replacement project.
- July 2008** Wal-Mart completes its nationwide inventory of TES in all store locations.
- November 2008** Wal-Mart completes its nationwide R&R of all TES with non-tritium exit signs.