

SECURITY



March 10, 2009

Director
Office of Federal and State Materials and Environmental Management Programs
Attention: Angela R. McIntosh, Mail Stop T8-E24
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: DEMAND FOR INFORMATION AND REPORTING DAMAGED DEVICES CONTAINING RADIOACTIVE MATERIALS

Dear Gentlemen:

Your letter, file no. EA-09-001 of January 16, 2009, requires general licensees with tritium exit signs provide information regarding these signs. The following information is submitted under affirmation.

- A. Explain how you ensure compliance with the NRC requirements applying to the possession, transfer, and disposal of tritium exit signs you have acquired. Identify and provide contact information for the individual you have appointed who is responsible for ensuring day-to-day compliance with these requirements.
- Compliance assurance:
 - Existing tritium exit signs are conspicuously labeled with stickers specifying turning over the signs to the Campus Safety Office for disposal. The Campus Safety Office secures a hazardous waste contractor for disposal of the signs.
 - Campus point of contact training and work experience
 1. Professional engineer in the Naval Nuclear Propulsion Program at Pearl Harbor Naval Shipyard from June 1969 through June 1994.
 2. Member of the Radiation Safety Committee at Kaiser Foundation Hospital, Hawaii Region from June 1994 through July 2004.
 3. U S Department of Transportation hazardous material transportation (49 CFR 172.704) training completed in January 1999 and retaken biennially with the last completion in January 2007.

- Point of contact:

Roy H. Yamamoto, BSME, CHSP, RPIH
Director, Campus Safety & Security
Brigham Young University Hawaii
55-220 Kulanui Street, BYUH #1911
Laie, HI 96762-1294
Voice: 808-675-3406
Fax: 808-675-3403
E-mail: roy.yamamoto@byuh.edu

B. State the number of tritium signs you currently possess and the number of signs that, according to your records, should be in your possession.

- Tritium signs currently in possession: 105
- Tritium signs on record: 533

C. Explain the reasons for any discrepancy between the number of tritium exit signs you currently possess and the number of signs that should be in your possession.

- Tritium signs improperly disposed: 9 (Non-Cited Violation levied by Nuclear Regulatory Commission, Region IV letter of May 9, 2002, Report of Lost Self-Luminous Exit Signs at Brigham Young University-Hawaii Campus)
- Tritium signs burned in a facility fire: 28 (Loss of signs in a facility fire reported by Brigham Young University Hawaii letter of February 25, 2003, Fire-Burned Self-Luminous Exit Signs to Nuclear Regulatory Commission, Region IV)
- Tritium signs disposed via transfer to a manufacturer (i.e., Isolite Corporation): 376
- Tritium signs disposed via hazardous waste disposal broker (i.e., Pacific Commercial Services, LLC) : 15

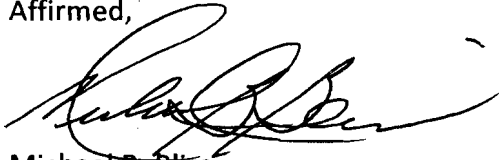
D. Describe any actions you have taken, or plan to take, to locate tritium exit signs.

- Not applicable

E. Describe any actions you have taken, or plan to take, to prevent future losses of tritium exit signs.

- Existing tritium exit signs are conspicuously labeled with stickers specifying turning over the signs to the Campus Safety Office for disposal. The Campus Safety Office secures a hazard waste contractor for disposal of the signs.

Affirmed,

A handwritten signature in black ink, appearing to read "Michael B. Bliss", written over a horizontal line.

Michael B. Bliss

Vice President for Administrative Services