

March 12, 2009

Director, Office of Federal & State Materials & Environmental Management of Programs
Attention: Angela R. McIntosh, Mail Stop T8-E24
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Re: Demand for Information and Reporting Damaged Devices containing Radioactive Material ("Demand for Information")

Dear Ms. McIntosh:

We have received the Nuclear Regulatory Commission's ("NRC") Demand for Information dated January 16, 2009 that was sent to Helicopter Support, Inc. ("HSI"). The Demand for Information related to compliance requirements for general licensees under 10 CFR § 31.5. We respectfully submit the following response to the Demand for Information.

As an initial matter, we note that it is our understanding that HSI is a general licensee under 10 CFR § 31.7, not § 31.5. This conclusion is based on the following considerations:

- The tritium exit signs possessed by HSI are properly characterized as "luminous safety devices for use in aircraft."
- The signs are manufactured and initially transferred by a specific licensee, and they are received by HSI as a general licensee for installation in aircraft which are sold to customers as general licensees.
- The activity of tritium in each sign does not exceed 10 curies.

We have reviewed the relevant regulations and made a number of inquiries to the NRC which confirmed that HSI would not be subject to the general licensee requirements under 10 CFR § 31.5 given the applicability and compliance with 10 CFR § 31.7. As such, HSI respectfully requests that HSI be removed from the NRC's list of general licensees under 10 CFR § 31.5.

That said and in a good faith effort to cooperate and respond in what we hope is a more helpful manner, we felt it appropriate to respond to the Demand for Information issued under 10 CFR § 31.5 and to otherwise provide information that might be useful to the NRC.

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;

- **Persons Responsible for Day to Day Compliance:**

Mike DeNigris
Manager of Materials
203-416-4177

Carman Jausel
Manager of EHS
203-416-4007

- **All exit signs have been accounted for and are tracked by date of possession and transfer of ownership. HSI has not had any radiation incidents, theft or loss of licensed material.**
- **There has been no disposal of any exit signs by HSI; therefore, no devices have been disposed of improperly. In the event of such an occurrence, damaged sign or device with the indication of**

failure, a report would be generated as required with a brief description of the event and the remedial action taken. This report would be sent to the Director, Office of Federal and State Materials and Environmental Management Programs within the appropriate deadlines.

- **All labels have been affixed to the device by the supplier (specific licensee) at the time of receipt and are not removed before or when transferring ownership to our customers.**
- **No testing has been required. The signs contain only tritium, and not more than 100 microcuries of other beta and/or gamma emitting material and not more than 10 microcuries of alpha emitting material. The devices are held in storage in the original shipping container prior to initial installation.**
- **HSI has not held any tritium exit signs for longer than two years.**
- **HSI does not manufacture or import any devices containing byproduct material.**

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

- **HSI currently has in its possession forty-three tritium exit signs held in storage in their original shipping containers.**

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

- **No discrepancies.**

D. Describe any actions you have taken, or plan to take, to locate the tritium exit signs that should be, but are not in your possession.

- **No discrepancies.**

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

- **Control measures regarding the possession, transfer and disposal include internal tracking of all purchase and sales of exit signs:**
 - **Moving inventory to a secured area to ensure that they are not stolen or damaged.**
 - **Continuing to ensure all labels have been affixed to the device by the supplier at the time of receipt and are not removed before or when transferring ownership.**
 - **Continuing to ensure devices contain only tritium with an activity of no more than 10 curies per sign**
 - **Ensuring the signs is held in storage in the original shipping container prior to initial installation.**
 - **Continuing to not hold any devices for longer than two years.**
 - **Not manufacturing or importing any devices containing byproduct material.**
 - **Reporting damaged exit signs to the NRC within 30 days and disposing of them appropriately.**

If you should have any additional questions or concerns, please do not hesitate to contact Carman Jausel at 203-416-4007.

Very truly yours,



Chris Bogan
Vice President Finance & Administration