

George F. Neeson VP, Engineering, Housekeeping & Laundry Operations



March 6, 2009



Director
Office of Federal and State Materials
and Environmental Management Programs
Attn: Angela R. McIntosh
Mail Stop T8-E24
Washington, DC 20555



Re: Demand for Information and Reporting Damaged Devices Containing Radioactive Material



Ms McIntosh:



This letter is in response to your recent "Demand for information and reporting damaged devices containing radioactive material" Please note that this response contains a report for full service owned and managed hotels operating under the Hilton, Conrad, Embassy Suites, Doubletree and Waldorf=Astoria Collection hotel brands. We are not reporting for hotels that operate under franchise license agreements with Hilton since those hotels are independently owned and operated and Hilton Hotels Corporation would not have access to the information being sought by your agency.



A. We have provided NRC requirements and guidelines to all owned/managed hotels operating under the brands referenced above and have posted such requirements and guidelines on our internal intranet site for easy access and ongoing reference for our hotels.



The attached report also contains current contact information for the person responsible for ongoing monitoring at each site that has Tritium signage.



B. We can account for a total of 958 out of the assumed/identified original number of 963 of these signs.



C. The disparity between the current versus original number of five (5) signs includes three (3) signs at the Hilton Suites Detroit/Auburn Hills hotel and two (2) at the Hilton Seattle Airport hotel. The hotel located in Detroit/Auburn Hills has advised that these signs were noted as missing approximately five years ago due to vandalism. The Seattle hotel has advised that it is their understanding that the signs were broken and discarded some time ago. However, the hotels have been unable to locate any documentation on these missing signs. Because of staff changes at both facilities we have been unable





- D. To determine if the missing signs were reported at the time of loss.
- E. We have sent documentation to all owned/managed properties operated under the brands noted above and have received responses for all of these hotels for a total of 178 inquiries/responses. Only 34 hotels reported that they had Tritium signs installed. The number ranges from 1 to 160 such signs.
- F. We have instructed the hotels to immediately communicate to the Hilton corporate office (to the attention of the Vice President Engineering) any change in number of existing (new, disposed of, or missing) signs. We have also instructed the hotels to immediately notify us in the event that such signs are damaged and require replacement and to also notify your agency or the applicable state designee as required and outlined in your demand letter and attachments.

At this time, we are in the process of notifying and surveying approximately seventy (70) hotels representing focused service owned and managed hotels operating under the Hilton Garden Inn, Homewood Suites, Hampton Inn, and Hampton Inn and Suites brands.

We anticipate that it may take these smaller hotels a longer period of time to respond given the limited number and non technical nature of the staff at some of these locations. Therefore, Hilton respectfully requests that you grant an extension of time to May 15, 2009 for us to respond to you on behalf of the hotels operating under our focused service brands. We will also send by email message a copy of this request for extension to MSEA@NRC.gov, as noted on the Demand for Information transmittal.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

I have provided my contact information below should you have any questions.

Regards

George Neeson

VP Engineering, Housekeeping & Laundry Operations

Hilton Hotels Corporation

9336 Civic Center Drive

Beverly Hills, CA 90210

(310) 205-4360 - direct

(310) 205-3288 - fax

CC: T. Raynor

C. Dutton