
Facsimile Cover Sheet

To: Angela McIntosh
Company: U.S. Nuclear Regulatory
Commission
Phone:
Fax: 301/415-5955

From: Elena Pfarr
Company: Macy's, Inc.
Phone: 513/579-7625
Fax: 513/579-7290

Date: 5/15/09
Pages including this 5
cover page:

Comments:

**ENVIRONMENTAL SERVICES****Elena C. Pfarr**

Direct Dial: 513-579-7625

E-Mail: elena.pfarr@macys.com

May 15, 2009

VIA FACSIMILE AND UPS OVERNIGHT MAIL
(301) 415-5955

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

**Re: Demand for Information and Reporting Managed Devices
Containing Radioactive Material dated January 16, 2009**

Dear Ms. McIntosh:

On behalf of Macy's Retail Holdings, Inc. and its corporate affiliates, I am submitting this response to the referenced Demand. This response is provided prior to May 18, 2009 as authorized by the Office. The following information corresponds to the lettered requests contained in Section III of the Demand.

- 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.

Response: Macy's has a written corporate policy regarding the possession, transfer, and disposal of tritium exit signs. A copy of the policy is attached. Compliance with the policy is monitored. The individual responsible for day-to-day compliance is the Corporate Environmental Services Manager, Elena C. Pfarr, 7 West Seventh Street, Cincinnati, OH 45202, telephone number 513-579-7625.

- 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.

Response: On information and belief based on a facility-by-facility visual survey, the number of tritium exit signs currently in possession of Macy's is 829. Records reviewed by Macy's reflect that 1028 signs were shipped to Macy's, or to a facility owned by a company later acquired by Macy's, beginning in 1981. The vast majority of the signs were shipped in 1981 and 1991. Six (6) tritium exit signs were shipped after August 15, 1991, and the date of the last shipment was December 9, 2003.

- 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.

May 15, 2009
Page 2

Response: We believe the discrepancy (199 signs) between the number of signs shown in the records and the number of signs shown in the inventory may be attributed to the fact that several of the facilities identified in the records were sold or demolished more than three (3) years ago.

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

Response: Macy's completed the facility-by-facility visual inspection and survey referenced above to confirm (i) the presence of tritium exit signs, (ii) the individual serial number assigned to each sign, (iii) whether the sign functions properly, and (iv) whether the sign reached its expiration date.

An inventory of tritium exit signs has been prepared and will be maintained under the direction of the individual responsible for ensuring day-to-day compliance with NRC requirements. During the foregoing inspection facility personnel were instructed to attach a prescribed label to each tritium exit sign with an illegible or missing label. If no serial number was legible facility personnel were instructed to assign one for inventory and control purposes. Signs that have reached their expiration date are to be replaced and disposed of properly.

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

Response: Macy's has distributed the attached tritium exit sign management program and disposal procedures to the appropriate facility personnel. Compliance with the program and procedures will be monitored regularly.

Macy's appreciates the direction of the Nuclear Regulatory Commission in promulgating regulations establishing the general license for tritium exit signs and in providing guidance to the regulated community.



Elena C. Pfarr

STATE OF OHIO)
) SS:
COUNTY OF HAMILTON)

On this 15th day of May in the year 2009, before me, the undersigned notary public, personally appeared Elena C. Pfarr, known to me to be the person whose name is subscribed to the within instrument and acknowledged that she executed the same for the purposes therein contained.

IN WITNESS WHEREOF, I hereunto set my hand and official seal.



JEANNETTE P. MAXEY
Attorney at Law
Notary Public, State of Ohio
My Commission Has No Expiration Date.
Section 147.03 R.C.

My commission expires:


Notary Public

Attachments:

- Macy's Corporate Policy - Tritium Exit Sign Management
- Macy's Corporate Policy - Tritium Exit Sign Management Disposal Procedure

CORPORATE POLICY TRITIUM EXIT SIGN MANAGEMENT

I. BACKGROUND

Tritium EXIT signs are self-illuminating signs that contain the radioactive gas tritium. These signs produce green light continuously for several years without any external power source. Due to the presence of tritium, owners of these signs are subject to certain reporting and handling requirements pursuant to Title 10 of the Code of Federal Regulations Part 31.5 (10 CFR 31.5), enforced by the Nuclear Regulatory Commission (NRC).

Macy's has established this Tritium EXIT Sign Management Policy to provide Macy's associates with guidelines for handling, disposal, and record keeping in accordance with 10 CFR 31.5.

II. PROGRAM

A. **AWARENESS TRAINING** – Awareness training will be conducted with designated store or facility associates when they are hired and annually thereafter.

B. **ANNUAL INVENTORY** – Designated store or facility associates will conduct an annual inspection of all tritium EXIT signs at the facility. These inspections will confirm the presence of each tritium EXIT sign, its label, and its condition, and will report any necessary follow-up actions to Environmental Services.

C. DISPOSAL OF TRITIUM EXIT SIGNS

- **TRITIUM SIGNS MUST NOT BE DISPOSED OF IN THE SOLID WASTE STREAM.**
- If it appears that a tritium EXIT sign has been damaged facility associates should remove the sign from service at once and contact Environmental Services immediately as a report to the United States Nuclear Regulatory Commission may be required within 30 days.
- If it appears that damage to a tritium EXIT sign may have resulted in a release of tritium, facility personnel should contact Environmental Services immediately, as an immediate telephone report to the United States Nuclear Regulatory Commission may be required.
- Any tritium sign identified as unused, mal-functioning, or non-working will be designated for proper disposal through a licensed waste disposal facility. Within thirty (30) days of disposing of a sign, a report will be filed with the NRC indicating the device information, licensed waste disposal facility information, and date of disposal.

III. RECORD KEEPING REQUIREMENTS - Inventory and Disposal records will be archived electronically at the corporate office for a minimum of three (3) years.

DISPOSAL PROCEDURE TRITIUM EXIT SIGN MANAGEMENT

Tritium EXIT signs contain radioactive elements and may not be disposed in the solid waste stream (regular trash). This Disposal Procedure is part of the Macy's Tritium Exit Sign Management Program and describes the procedures to be followed in removing and disposing of tritium exit signs. Designated facility personnel are responsible for disposing of tritium exit signs through a properly licensed disposal facility pursuant to this procedure.

1. OBTAIN SIGN INFORMATION.

- Review the sign label.
- Note the manufacturer name, contact number and the radioactive content of the sign in Curies (or "Ci").
- Note the serial of the sign to be disposed of as this number must be provided to the Nuclear Regulatory Commission (NRC).

2. SELECT A LICENSED DISPOSAL FACILITY.

- Sign manufacturers often will provide a discount for disposal, or even dispose of a tritium exit sign for no charge, in connection with the purchase of a new (non-tritium) self powered EXIT sign.
- Alternatively, contact a licensed disposal facility. A list of licensed disposal facilities is attached.
- Obtain return instructions and any required authorization number directly from the disposal facility.

3. SHIP THE SIGN FOR DISPOSAL. Ship the tritium EXIT sign for disposal according to the disposal facility instructions. Make sure the box is sturdy, sealed, and properly labeled according to the instructions from the disposal facility.

4. NOTE THAT A DISPOSAL RECORD MUST BE PROVIDED BY THE DISPOSAL FACILITY. When this arrives send it immediately to Environmental Services. If the disposal facility has not sent a disposal record within ten (10) days be sure to follow up to ensure that the signs were disposed of properly.

5. REPLACE THE TRITIUM SIGN WITH A NON-TRITIUM SIGN. Order and replace disposed of signs with non-tritium models, unless no EXIT sign is required.

6. SEND A COPY OF THE DISPOSAL RECORD TO ENVIRONMENTAL SERVICES.

- Forward disposal records to Environmental Services at 7 West Seventh Street, Cincinnati, OH 45202 within 14 days of disposal. (Alternatively, you may send them to Elena.Pfarr@macys.com).
- Environmental Services will archive disposal records and provide a report to the NRC within 30 days of disposal.
- Disposal records will be maintained for a minimum of 3 years.

Questions? Contact Macy's Environmental Services at 513-579-7625.

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