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June 15, 2009

Via electronic mail and U.S. mail

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 D.C. 20555

Re: Response of United Airlines to Nuclear Regulatory Commission Demand for Information, EA-09-001

Dear Ms. McIntosh:

United Airlines (“United”) is submitting this letter to the Nuclear Regulatory Commission (“NRC”) in response to the above-referenced request regarding tritium-containing building exit signs (herein referred to as “tritium building signs”) subject to the general license at 10 C.F.R. § 31.5 and the corresponding requirements related to possession, transfer, and disposal of tritium building signs.

United has undertaken a comprehensive survey of United-owned locations and leased locations where United has applicable building maintenance responsibilities to confirm the precise number of tritium building signs possessed by United. Over the past several months, United has confirmed, after a thorough inspection of 120 locations, that only five locations have tritium building signs, with a total number of 34 tritium building signs. We are talking further with the landlords at some of these locations (United is a tenant at all five locations) and if we determine at any of these locations that the landlord owns and does all maintenance of the signs, we will update the NRC and reduce the list of signs in our inventory.

United has not identified any damaged tritium building signs or releases from tritium building signs during the course of the survey and, accordingly, has not had to make any reports to the NRC or any Agreement States related to damaged tritium building signs or releases. Complete historic records on purchase, transfer, and disposal of tritium building signs are not available; therefore, we are not in a position to explain if there is a discrepancy between the number of tritium building signs United currently possesses and the number reflected in prior

records. United is, however, confident that its physical survey has successfully inventoried all tritium building signs at its locations.

All five of the locations that possess tritium containing building signs are aware of the NRC regulatory requirements. In addition, based upon the information gathered in our survey and through coordination and input among various departments within United, we are in the process of implementing a formal tritium building signs compliance plan in order to ensure we have appropriate processes in place at United. This plan includes the following elements discussed below.

For purposes of complying with NRC's requirement to appoint persons responsible for day-to-day compliance, we have determined that those who can most effectively manage day-to-day compliance are located at the five locations where tritium building signs are located:

Mike Hanna
General Manager-Customer Service
United Airlines-LAXOZ
P. O. Box 92245
Los Angeles, CA 90009

Adrienne Simmons
General Manager-Customer Service
United Airlines-PDXOZ
7000 NE Airport Way
Portland, OR 97009
(503) 249-4200

Kenneth Brown
General Manager-Customer Service
United Airlines-SMFOZ
6922 Airport Blvd.
Sacramento, CA 95837
(916) 561-4520

Steven F. Sulgit
Manager-Environmental Compliance
United Airlines Maintenance Center
Bldg. 49 - SFOMP
San Francisco International Airport
800 S. Airport Blvd.
San Francisco, CA 94128
(650) 634-7209

Edward Lightle
General Manager-Customer Service
United Airlines - SJCOZ
1661 Airport Blvd. #31
San Jose, Ca, 95110
(408) 277-5601

In addition to those individuals noted above who are responsible for day-to-day compliance, our corporate Environmental Safety department will provide guidance to those stations and assist the company in United's policies for the management of tritium building signs. The primary contact for purposes of NRC contact on company-wide matters is:

Theodore E. Wells
Manager of Environmental Safety
United Airlines
1200 E. Algonquin Road
Elk Grove, IL 60007
(847) 700-6322

Now that United has a detailed survey of the locations of tritium building signs, we will be maintaining this list through notifications by the local personnel when a sign is removed and, as an additional measure, we are requiring that quarterly inspections be performed of the locations with tritium building signs. If a tritium building sign is identified as damaged or if there is theft or loss of such a sign, local personnel and Environmental Safety will coordinate to ensure the NRC is notified (or the appropriate Agreement State) in accordance with NRC requirements.

When a sign expires or otherwise requires removal, the local personnel will properly store the sign to ensure no breakage and transfer the sign to an entity with a specific NRC license authorizing receipt, as verified pursuant to NRC requirements. United's Environmental Safety department will provide guidance on appropriate facilities for disposal or recycling. Local personnel will submit notifications to the NRC regarding transfer of the signs to the new entity.

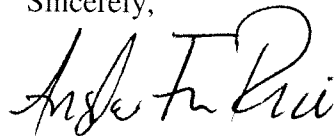
United is currently considering formal implementation of a policy to forbid the purchase of any new tritium building signs which we anticipate to be finalized shortly. We are also aware that there may be new buildings acquired or new leaseholds that could add tritium containing building signs into our inventory. Our corporate real estate department is aware and is implementing a policy of seeking information from the seller and/or landlord regarding the existence of any tritium building signs in newly acquired locations. If needed to identify the location of such signs, we will conduct physical inspections of these new locations. If such new tritium building signs are identified, we will ensure local personnel are made aware of the NRC regulatory requirements and United's associated policies.

Also, in regard to record-keeping, United will maintain records of any receipt, transfer and disposal of tritium building signs.

As discussed, United is in the process of implementing a formal compliance plan. We expect to have full roll-out completed within 30 days and will submit to you a further response by July 15th which will both report on implementation.

In conformity with the NRC's request, United's response is being submitted under oath or affirmation, as reflected in the attached Declaration executed pursuant to 28 U.S.C. § 1746. Please feel free to contact me at (312) 997-8235 with any questions regarding this response.

Sincerely,

A handwritten signature in black ink, appearing to read "Angela Foster-Rice". The signature is fluid and cursive, with the first name "Angela" being the most prominent.


Angela Foster-Rice

Via Electronic Mail

cc: Theodore Wells – WHQSY
Christopher Johnson - HDQOU
Christopher Sandifer – HDQOU
William Kasdorf – WHQGQ
Edward Eckardt – WHQAO
Mike Hanna – LAXOZ
Catherine Oard - LAXGQ
Adrienne Simmons- PDXOZ
Jeff Barrow-PDXGQ
Kenneth Brown – SMFOZ
Edward Lightle – SJCOZ
Steven Sulgit - SFOMP

DECLARATION

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing **Response of United Airlines to Nuclear Regulatory Commission Demand for Information, EA-09-001** is true and correct to the best of my knowledge and belief.



Theodore E. Wells

Executed on: 6/15/09