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December 28, 2009

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

Dear Ms. McIntosh:

On May 29, 2009, the Nuclear Regulatory Commission (NRC) sent Ms. Elizabeth Lowery, General Motors Vice President for Environmental, Energy and Safety Policy, a Demand for Information relating to tritium containing exit signs (TCES). The Demand for Information was received on June 1, 2009.

Also on June 1, 2009, General Motors Corporation filed for bankruptcy under the U.S. Bankruptcy Code. *In re: General Motors Corporation*, Case No. 09-50026 (REG), (Bankr. S.D. New York). Pursuant to §363 of the Bankruptcy Code, the bankruptcy court approved the sale of a portion of the assets of General Motors Corporation (Old GM) to a new company, General Motors Company (New GM). All assets not sold to GM Company remain in bankruptcy to this date. The sale to GM Company was completed on July 10, 2009. Subsequent to the sale closing, General Motors Corporation changed its name to Motors Liquidation Company (MLC) and General Motors Company changed its name to General Motors LLC.

General Motors LLC, by letter dated July 14, 2009, requested an extension of time to respond to the NRC's Demand for Information. On July 28, 2009, the NRC granted General Motors LLC a 90 day extension (until October 31, 2009) to respond. As the bankruptcy proceedings moved forward, MLC representatives were notified by General Motors LLC representatives of NRC's Demand for Information. MLC decided that it would provide a separate response covering the facilities that remained with MLC and that General Motors LLC would respond for facilities acquired through the §363 sale and those sites that GM LLC leased from MLC. (See attached list of MLC facilities covered, Appendix 1). On October 29, 2009, MLC requested an extension of time to respond to the NRC's Demand for Information. On November 11, 2009, the NRC granted MLC's request for a 90 day extension (until December 31, 2009) to respond.

For the facilities listed in Appendix 1 the following is MLC's response to the Demand for Information.

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I. "Explain how MLC ensures compliance with the NRC requirements applying to the possession, transfer, and disposal of tritium exit signs MLC has acquired. Identify and provide contact information for the individual MLC has appointed who is responsible for ensuring day to day compliance with these requirements."

MLC is responsible for the orderly wind-down of the bankruptcy estate. MLC does not engage in any automotive manufacturing or assembly operations in the United States. MLC's activities include: selling plant machinery and equipment, demolishing fixed structures, selling or transferring real property, and managing the environmental remediation of owned sites, as well as administering the bankruptcy process for the estate.

The MLC management team includes a vice president of environmental, a vice president of asset liquidation, and a vice president of demolition and facility decommissioning. At the executive level, each of these individuals shares responsibility for the proper possession, transfer, and disposal of TCES that are present at the Old GM sites. At the local level, MLC engages project managers and environmental consultants that have been made aware of the need to comply with NRC requirements. As GM plants come off line and are decommissioned and demolished, an important step in the process is to identify and properly dispose of TCESs.

Robert Hare, Director of Environmental, has been appointed as the individual who is responsible for ensuring MLC's day to day compliance with the NRC's requirements. Mr. Hare can be reached at rhare@alixpartners.com or (248) 255-2792.

II. "State the number of tritium exit signs that MLC currently possesses and the number of signs that, according to MLC's records, should be in MLC's possession."

Currently, MLC knows of 29 TCES devices that it has in its possession. The sites MLC was responsible for surveying do not have active operations and were not under the control of the current MLC management prior to July 10th (the date of the §363 sale). All personnel involved in the operation of these sites prior to July 10th, 2009 are now employees of GM LLC. Due to the nature of the bankruptcy, there is little in the way of site records, purchasing information, or other data available to MLC that would have allowed a comparison between the quantities of TCESs on-hand to the quantities that should be in MLC's possession.

III. "Explain the reasons for any discrepancy between the number of tritium exit signs MLC currently possesses and the number of signs that should be in MLC's possession."

As MLC is not aware of any historical record available of the number of TCESs that should be present at MLC sites, there is no way to verify that all TCES devices have been accounted for. During the brief period of time that MLC has been under new management, policies and procedures have been used to ensure that upon the decommissioning and demolition of a building, care is taken to ensure all TCESs are properly identified, secured, and properly disposed of. Facility personnel are aware that these devices require specific

handling and cannot be disposed of as general refuse. Our site managers and consultants have indicated that TCES devices no longer in service were either sent back to the manufacturer or sent to an approved facility. No record of these shipments is currently available. Since the commencement of the bankruptcy, MLC has not engaged in any significant demolition or other activities that could have resulted in the disposal of TCES.

IV. "Describe any actions MLC has taken or plans to take, to locate tritium exit signs that should be, but are not, in MLC's possession."

As there is not an adequate record to identify any signs that may have been lost, stolen, or destroyed, MLC believes that the surveys circulated to key personnel at owned facilities is sufficient for the purposes of identifying all possible TCESs that are currently on hand. MLC representatives inspected site storage areas, manufacturing floor space, office areas, and other locations where exit signs could potentially be located. However, in the event any facility is planned for demolition, decommissioning activities will include a thorough inspection to ensure there are no TCESs present.

V. "Describe any actions MLC has taken or plans to take, to prevent future losses of tritium exit signs."

As described above, MLC worked with key site personnel to ensure all TCESs currently on hand have been identified, are secured, and will be properly disposed of. Additionally, the appointment of Robert Hare as MLC's TCES point person will further ensure compliance with NRC policies as MLC continues its wind-down of the Old GM estate.

Should you need further clarification to the information provided in this letter or with MLC activities with Generally Licensed TCES devices, please contact Robert Hare at (248) 255-2792 or rhare@alixpartners.com.

Sincerely,



James Redwine
Vice President – Environmental
Motors Liquidation Company

Appendix 1 – MLC Surveyed Facilities
(Facilities with Structures Intended for Occupancy)

Site	City	State
Employee Development Center	Pontiac	MI
Powertrain - Romulus Engineering Center	Romulus	MI
Saginaw Malleable Iron	Saginaw	MI
Saginaw Nodular Iron	Saginaw	MI
Former Leed's Assembly Plant	Kansas City	MO
GM Ewing Plant	Ewing	NJ
One General Motors Circle Syracuse	Syracuse	NY
Janesville Training Center	Janesville	WI
Former Delco Chassis Plant	Livonia	MI
Former Leed's Assembly Plant	Kansas City	MO
Adjacent to Salinas Industrial Park	Syracuse	NY
Fiero site (Powerhouse)	Pontiac	MI
Flint Flowthrough Warehouse	Flint	MI
Pontiac Fiero Site (excl'd Powerhouse)	Pontiac	MI
GMPT - Massena	Massena	NY
GMVM - Moraine Assembly	Moraine	OH
Stamping - Pittsburgh	West Mifflin	PA
Venture 2000 Industrial Park	Anderson	IN
1723 N. Washington	Kokomo	IN
Buick City	Flint	MI
Flint West - Flint River (Bluff Street)	Flint	MI
Plant 2, 3 & 6	Lansing	MI
Former Plant 5	Lansing	MI
Former Delco Chassis Plant	Livonia	MI
Pontiac Centerpoint Campus - Central	Pontiac	MI
PCC-Validation	Pontiac	MI
Pontiac Centerpoint Campus - East	Pontiac	MI
Pontiac Centerpoint Campus - West	Pontiac	MI
ACG - Penske site	Pontiac	MI
Manual Transmission of Muncie	Muncie	IN