



GM LLC

October 29, 2009

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

Certified Mail
Return Receipt Requested
7007 0220 0003 9953 4463

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 certain assets of General Motors Corporation (Old GM) to a new company, General Motors Company (New GM). The sale was completed on July 10, 2009. After the closing, General Motors Corporation (Old GM) changed its name to Motors Liquidation Corporation (MLC). Then on Oct 16, 2009, General Motors Company (New GM) changed its name to General Motors LLC.

Given the size, scope and unprecedented nature of the bankruptcy proceedings, Mr. Levon Hachigian 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 a 90 day extension (until October 31, 2009) to respond.

As the bankruptcy proceedings moved forward, MLC representatives were notified 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 leased by MLC to General Motors LLC. (See attached list of General Motors LLC facilities covered, Appendix 1). Please note that General Motors LLC recently purchased five U.S. facilities from Delphi Corporation. No information is being provided at this time for the former Delphi plants, but we will supplement our responses once the information is obtained.

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

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

Given the size of General Motors LLC, no single individual is responsible for ensuring compliance with all NRC requirements. General Motors Worldwide Facilities Group provides overall guidance and policy on NRC matters. Mr. Levon Hachigian, Director WFG Facility Energy & Environment manages this responsibility. At the local level, the environmental engineer at each facility is responsible for the proper disposal of these devices. In 1991, the former General Motors Corporation issued SWM 91-1, Radioactive Waste Disposal Guidelines. General Motors LLC continues to utilize this guidance document and plans to update, revise and reissue this guidance document in the near future.

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

Currently, General Motors LLC has 420 TCES devices. Based on internal surveys, interviews of plant personnel and a review of available purchasing records, we have determined that 205 TCES devices were disposed of in the past and eight devices listed in Appendix 2 were identified as potentially missing at one facility.

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

Because there is no central recordkeeping system for TCES devices, there is no way to verify that all TCES devices have been accounted for except by surveying each facility. Many of these units were purchased many years ago. Furthermore, the former General Motors Corporation (MLC) has undergone several reorganizations in the past. Written guidance covering the handling and disposal of TCES devices was developed in 1991 by General Motors Corporation. Facility personnel are aware that these devices require specific handling and cannot be disposed of in the general trash. Site personnel indicated that TCES devices no longer in service were either sent back to the manufacturer or sent to an approved facility. Based on our review of our disposal practices, we believe that these devices were handled appropriately when their useful life expired.

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

General Motors LLC corporate staff, via two surveys, solicited plants to inspect their facilities for TCES devices that are located on site. Sites inspected their storage areas, manufacturing floor space, office areas, and other locations where exit signs could

potentially be located. In addition, facilities reviewed available purchasing, inventory, and maintenance records to identify TCES devices that should be on site.

III. E. "Describe any actions GM has taken or plans to take, to prevent future losses of tritium exit signs."

In addition to the actions described above, General Motors LLC has improved its current system relating to the management of TCES devices. Additional training is being developed to enhance awareness of corporate guidance and policies. A General License Device Committee will be established to assist sites with maintaining day-to-day compliance with regulatory and corporate requirements. Also, General Motors LLC is developing a TCES device self assessment module. The module is expected to be completed in early 2010 for the 2009 reporting year.

Should you need further clarification to the information provided in this letter or with General Motors LLC activities with Generally Licensed TCES devices, please contact Jeff Seibert at (248) 343-7613 or at jeffrey.l.seibert@gm.com.

Levon Hachigian
Director
Facility Energy & Environment
Worldwide Facilities Group

I certify that based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate and complete.

Signature *Levon Hachigian*

Date Oct 29, 2009

Subscribed and sworn to by _____ before me on the 29th day of October, 2009.

Signature *Allicia Najor*

Printed name Allicia Najor

Notary public, State of Michigan, County of Macomb

My commission expires April 3, 2015

Cc: Jeff Seibert

ALLICIA NAJOR
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF MACOMB
My Commission expires April 3, 2015
Acting in the County of Macomb

Appendix 1 - Facilities GM LLC

PLANT NAME	LOCATION	STATE
GMPT Baltimore Transmission	Baltimore	MD
GMPT Bay City Components	Bay City	MI
GMPT Bedford Foundry	Bedford	IN
GMPT Defiance Foundry	Defiance	OH
GMPT Flint Engine South	Flint	MI
GMPT Flint North	Flint	MI
GMPT Fredericksburg	Fredericksburg	VA
GMPT Livonia Engine	Livonia	MI
GMPT Romulus Engine	Romulus	MI
GMPT Saginaw Metal Casting Operations	Saginaw	MI
GMPT Toledo Transmission	Toledo	OH
GMPT Tonawanda Engine	Tonawanda	NY
GMPT Warren Transmission	Warren	MI
GMPT Willow Run Transmission	Ypsilanti	MI
GMPT Ypsilanti Transmission	Ypsilanti	MI
GMSC Flint Metal Center	Flint	MI
GMSC Flint Tool And Die	Flint	MI
GMSC Lansing Regional Stamping	Lansing	MI
GMSC Lordstown Metal Center	Lordstown	OH
GMSC Mansfield Metal Center	Mansfield	OH
GMSC Marion Metal Center	Marion	IN
GMSC Parma Metal Center	Parma	OH
GMSC Pontiac Metal Center	Pontiac	MI
GMVM Arlington Assembly	Arlington	TX
GMVM Bowling Green Assembly	Bowling Green	KY
[GMVM DORAVILLE ASSEMBLY]	Doraville	GA
GMVM Fairfax Assembly	Fairfax	KS
GMVM Flint Assembly	Flint	MI
GMVM Flint Assembly Medium Duty	Flint	MI
GMVM Fort Wayne Assembly	Fort Wayne	IN
GMVM Hamtramck Assembly	Detroit	MI
[GMVM JANESVILLE ASSEMBLY]	Janesville	WI
GMVM Lansing Delta Township Assembly	Lansing	MI
GMVM Lansing Grand River Assembly	Lansing	MI
GMVM Lordstown Assembly	Lordstown	OH
GMVM Orion Assembly	Lake Orion	MI
GMVM Pontiac Assembly Center	Pontiac	MI
GMVM Spring Hill Assembly	Spring Hill	TN
GMVM Wentzville Assembly	Wentzville	MO
Non-Mfg Grand Blanc Weld Tool Center	Grand Blanc	MI
Non-Mfg Milford Proving Ground	Milford	MI
Non-Mfg PCC-West	Pontiac	MI
Non-Mfg Powertrain Headquarters and Laboratories	Pontiac	MI
SPO Aurora-22	Aurora	CO
SPO Boston-55	Westwood	MA
SPO Burton-72	Burton	MI
SPO Charlotte-39	Charlotte	NC
SPO Chicago-02	Bolingbrook	IL
SPO Cincinnati-07	Westchester	OH
SPO Columbus-23	Groveport	OH
SPO Davison-77	Davison	MI
SPO Drayton Plains-78	Waterford	MI
SPO Flint-01 (Swartz Creek)	Swartz Creek	MI
SPO Fontana-48	Fontana	CA

SPO Fort Worth-41	Roanoke	TX
SPO World Headquarters-00	Grand Blanc	MI
SPO Hudson-30	Hudson	MN
SPO Jacksonville-79	Jacksonville	FL
SPO Lansing-76	Lansing	MI
SPO Martinsburg-37	Martinsburg	WV
SPO Martinsburg-51	Martinsburg	WV
SPO Memphis-92	Memphis	TN
SPO Packaging Lab-05	Flint	MI
SPO Philadelphia-06	Langhorne	PA
SPO Pontiac-75	Pontiac	MI
SPO Rancho Cucamonga-85	Rancho Cucamonga	CA
SPO Reno-86	Reno	NV
SPO St Louis-38	Hazelwood	MO
SPO West Chester-94	West Chester	OH
SPO Willow Run-58	Belleville	MI
SPO Ypsilanti-87	Ypsilanti	MI
Yuma Proving Ground	Yuma	AZ

