



KIDDE-FENWAL, INC.
400 MAIN STREET
ASHLAND, MA 01721
TEL: (508) 881-2000
FAX: (508) 881-6729

May 27, 1992

Ms. Torre Taylor
Commercial Use Section
Medical, Academic, and Commercial
Use Safety Branch
Division of Industrial and
Medical Nuclear Safety, NMSS
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dear Ms. Taylor:

This is in response to your letter of May 18, 1992: Mail Control No. 021351.

Your letter asked for additional information or clarification of certain items relating to our December 9, 1991, request for amendment of NRC License No. 20-15285-03E. The primary purpose of the requested amendment is to provide for distribution of the Kidde-Fenwal Model CPD705X smoke detector. The CPD705X will be manufactured by Nohmi Bosai, Ltd. of Japan and distributed in the U.S. by Kidde-Fenwal, Inc. The CPD705X series smoke detector is described in our request for amendment and in Registration Certificate NR-668-D-101-E, as amended April 27, 1992.

The following responds to the 5 items identified in your letter of May 18, 1992:

1. Regarding our request for name change to "Kidde-Fenwal, Inc." you asked that we review NRC Information Notice No. 89-25 and comment on items about changes in organization, procedures, and personnel.

From the standpoint of the conduct of NRC licensed activities, the requested name change has no effect on organization, procedures, and personnel. As evidenced by the enclosed document issued October 25, 1991, by the State of Delaware and the document of acknowledgement issued October 29, 1991, by the Commonwealth of Massachusetts, only the name of the Corporation has been changed. Because the name change involved neither transfer of ownership nor control of licensed activities, we delayed informing the NRC until our next communication with your Office on other matters. We regret any inconvenience which may have been caused by this delay.

2. My statement about 2,000 units warehoused at any time or location was part of my paragraph pertaining to §32.26(b)(8) and was mentioned because of the requirement of 10 CFR 32.27(a) that we demonstrate that "...in normal handling and storage of the quantities of exempt units likely to accumulate in one location during marketing, distribution, installation, and servicing of the product, it is unlikely that the ...dose... to a suitable sample of the group of individuals expected to be most highly exposed to radiation or radioactive material from the product will exceed the dose to the appropriate organ as specified in Column I of the table in §32.28."

B-62

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For purposes of this demonstration for §32.27(a), a warehouse containing stored exempt units involves the group of individuals expected to be most highly exposed. Our 2,000 number is compatible with the analysis in Appendix U of our application and with our distribution experience.

You specifically asked whether we have locations of distribution other than 400 Main Street, Ashland, MA. The answer is "no".

All units from Nohmi in Japan will come directly to Kidde-Fenwal, Ashland, MA where the required QC procedures will be performed prior to distribution as exempt units. These units will be accounted for in our records when transferred from Ashland for reporting purposes pursuant to §32.29(c)(1).

3. Nohmi Bosai, Ltd. receives the source in the form of a foil. The foil is then assembled into a holder by Nohmi Bosai.

4. The Nohmi Bosai Smoke Detectors, Models 7155 and 7156 are photoelectric and do not contain radioactive material.

The Kidde-Fenwal Smoke Detectors, Models CPD7010 and CPD7011 have been discontinued. We do not wish to continue the distribution of these models.

5. The Kidde-Fenwal, Inc. Smoke Detector Models are CPD-702X and CPD-704X. Please disregard the series notation of CPD-702X-4X Series.

If you have any questions, please contact me at (508) 881-2000, Ext. 2733.

Sincerely,



Robert A. MacNutt
Quality Manager

RAM/ms

Enclosures: As stated

State of Delaware



Office of Secretary of State

I, MICHAEL HARKINS, SECRETARY OF STATE OF THE STATE OF DELAWARE DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF AMENDMENT OF FENWAL INCORPORATED FILED IN THIS OFFICE ON THE TWENTY-EIGHTH DAY OF OCTOBER, A.D. 1991, AT 4 O'CLOCK P.M.

RECEIVED FOR RECORD

Oct 30 A.D. 19 *91*

Michael T. Sauer

RECORDER

\$8.00 STATE DOCUMENT FEE PAID



751301057

Michael Harkins
Michael Harkins, Secretary of State

AUTHENTICATION: 3218034

DATE: 10/29/1991

EK-9137PG095

ORIGINAL

CERTIFICATE OF AMENDMENT OF CERTIFICATE OF INCORPORATION
OF
FENWAL INCORPORATED

It is hereby certified that:

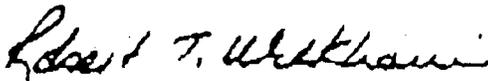
1. The name of the corporation (hereinafter called the "Corporation") is Fenwal Incorporated.

2. Article First of the Certificate of Incorporation of the Corporation is hereby amended by deleting said Article in its entirety and substituting in its place the following:

FIRST. The name of the Corporation is Kidde-Fenwal, Inc.

3. The amendment of the Certificate of Incorporation herein certified has been duly adopted in accordance with the provisions of Sections 228 and 242 of the General Corporation Law of the State of Delaware.

Signed and attested to on October 25, 1991


ROBERT T. WICKHAM, President

Attest:


JOHN F. HANNON, Secretary

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STATE OF DELAWARE
SECRETARY OF STATE
DIVISION OF CORPORATIONS
FILED 04:00 PM 10/28/1991
751301057 - 2133310

The Commonwealth of Massachusetts

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MICHAEL JOSEPH CONNOLLY
Secretary of State

ONE ASHBURTON PLACE
BOSTON, MASS. 02108

FEDERAL IDENTIFICATION
NO. 51-0305282

AMENDED FOREIGN CORPORATION CERTIFICATE

We, Robert T. Wickham, ~~President/Vice President~~
and John F. Hannon, ~~Clerk/Assistant Clerk or~~
~~Secretary/Assistant Secretary of~~ Fenwal Incorporated
in compliance with the provisions
of General Laws, Chapter 181, Section 4, certify that:

1. The name of the corporation has been changed to Kidde-Fenwal, Inc.

2. The location of its principal office has been changed to:

-No Change-

3. The activities of the corporation within Massachusetts have been changed and may now be briefly described as follows:

-No Change-

IN WITNESS WHEREOF AND UNDER THE PENALTIES OF PERJURY, we hereto
sign our names this 29th day of October, 1991.

Robert T. Wickham

Robert T. Wickham, ~~President or Vice President~~

John F. Hannon

John F. Hannon, ~~Clerk or Assistant Clerk or~~
~~Secretary or Assistant Secretary~~

*If no change, so indicate