DEPARTMENT OF LAW

#### OFFICE OF THE ATTORNEY GENERAL

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March 19, 2010

Office of Federal and State Materials and Environmental Management Programs Attn: Angela McIntosh
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Hello Ms. McIntosh:

Thank you for your renewed contact. As you know, I have been tasked with assisting the State of Alaska respond to the U.S. Nuclear Regulatory Commission's inquiry concerning the State of Alaska's possession of Tritium Exit signs. Since our last communication we have undertaken efforts across multiple state agencies to investigate the status of Tritium Exit signs that may remain in the state's possession and to determine whether we could reconcile our inventory with the records provided by your agency. This correspondence provides you with updated information and a current status.

We have made inquires of the following state agencies, forwarding the NRC's information request and listing of signs and have asked that each perform a physical inventory of their facilities: Department of Corrections, Department of Fish & Game, Department of Administration, Alaska Court System, Department of Health & Social Services, Department of Public Safety and Department of Education and Early Development. The information obtained through this process and the current known status is described below.

#### Department of Transportation and Public Facilities

Al Gilbert of the Department of Transportation and Public Facilities central region indicates that there are 14 tritium exit signs in possession. Mr. Gilbert's responses to NRC's inquiry is as follows:

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 contract information for the individual you have appointed who is responsible for ensuring day to day compliance with these requirements.

Central Region Facilities ensures compliance through personnel training and program oversight. All maintenance personnel are briefed on the requirements in section 31.5 in part

10 of the Code of Federal Regulations. Our responsible person in Central Region DOT&PF is Mr. Al Gilbert, Building Maintenance Manager.

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.

Central Region Facilities currently possesses 14 tritium exit signs. Three of these signs (device # 22058) are currently installed at our Vehicle Maintenance Station in Bethel; four of these signs (device # 24684) are currently installed at our Vehicle Maintenance Station in Seward; five of these signs (device #64266) are currently installed at our Highway Maintenance Station in Homer; and two of these signs (device #unknown) are installed at our Vehicle Maintenance Station in Dutch Harbor. Records indicate a total of 86 tritium exit signs were in use in DOT&PF, Central Region.

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.

Records indicate a total of 86 tritium exit signs were in use in Central Region DOT&PF. Of that 86, 14 are still in use today. Our records indicate an additional 31 signs (device # 64251) were returned to the vendor (Stusser Electric) on 11/16/06. And unknown quantities of signs (device #59070) were returned to the vendor (Stusser Electric) on 11/02/04. Records indicate \$850.00 was charged for the return of this unknown quantity of signs. The Vendor does not retain records longer than two years so no additional information was available from the vendor.

D. Describe any actions you have taken, or plan to take, to locate tritium exit signs that should be, but are not, in your possession.

Central Region DOT&PF inspected all of its State buildings for the presence of tritium exit signs. In addition, we have contacted Stusser Electric to request copies of archived records to account for any unknown quantities of returned tritium signs. We will work closely with our suppliers to account for the lost/missing exit signs. All indications are that the tritium exit signs were returned and properly disposed of.

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

We plan to remove the remaining 14 tritium exit signs and return them to the vendor for proper disposal to eliminate the responsibility of tracking hazardous materials.

In addition, Steve Meierotto, Northern Region Building Maintenance Manager has identified 58 signs, as set forth on the attached document. These signs will be properly disposed/returned for disposal.

#### Alaska Court System

Lisa Hall of the Alaska Court System has identified a total of 24 tritium exit signs located in three buildings; Kenai Courthouse (18 signs), Palmer Courthouse (5 signs) and the 444 H Street Building (1 sign).

#### Department of Health & Social Services

Arnold Liebelt of the Department of Health & Social Services has identified 59 tritium exit signs as set forth on the attached list

#### Department of Public Safety

Charles Hull of The Department of Public Safety has identified one sign in Fairbanks that appears to be a tritium exit sign and has asked the Department of Transportation/Public Facilities Central region to examine the Soldotna, Bethel, and Aircraft Hangar facilities. Mr. Hull has also made contact with two other facilities in Sitka and the Crime Lab.

#### Department of Education and Early Development

Sam Kito of the Department of Education and Early Development has provided an inventory of 63 signs located in six buildings on the Mt. Edgecumbe campus The inventory listing is attached.

#### **Department of Corrections**

We have made inquiry of Charles Finch, Facilities Manager for the Department of Corrections, but have not yet received his final response. We will follow-up to inquire about the status of his efforts to inventory any signs in the possession of the Department of Corrections.

#### Department of Fish & Game

John White of The Department of Fish & Game has indicated that the agency has no signs listed on the NRC inventory.

#### Department of Administration

Tanci Mintz of the Department of Administration indicates that none of the identifiable buildings listed on the NRC inquiry are under the care and custody of the Department of Administration.

Please contact the undersigned if you require clarification or further information pertaining to the status of this effort to respond appropriately to the NRC's inquiry. We will provide you with an update if our efforts uncover additional information.

Very truly yours

DANIEL S. SULLIVAN ATTORNEY GENERAL

TITOICUT GENERAL

By: My Twomey
Timothy M. Twomey

Assistant Attorney General

TMT/ljt Enclosures

Location	Make	Model	Serial Number	
В	uilding 1330			
	ctivity Center			
Main Exit	Perm Ex	P-160	Unknown	
Back Door	Perm Ex	P-160	Unknown	
Single Door- Out to Cortyard	Perm Ex	P-160	Unknown	
	ience Classes	D 400		12 Lights
I TT Office- Hallway Rm 126	Perm Ex	P-160		0 1:-1-4-
Rm 127	Dorm Ev	D 160	Linknown	2 lights
Rm 124	Perm Ex Perm Ex	P-160 P-160	Unknown Unknown	CAT
Rm 125	reiiii Ex	F-100	UIKHOWH	
1111 120	Library			
Library Entrance	Perm Ex	P-160	Unknown	
Rm 120	Perm Ex	P-160	Unknown	
	Perm Ex	P-160	Unknown	
Library- Water Side Exit	Perm Ex	P-160	Unknown	
Library- Above Book Shelf	Perm Ex	P-160	Unknown	
Library- Exit To Courtyard	Perm Ex	P-160	Unknown	
Rm 119	Perm EX	P-160	Unknown	
	Perm EX	P-160	Unknown	
	Classrooms			
Classrooms-Hallway	Perm Ex	P-160	Unknown	
Dark Rm 113	Perm Ex	P-160	Unknown	
	Perm Ex	P-160	Unknown	
Rm 115	Perm Ex	P-160	Unknown	
5	Perm Ex	P-160	Unknown	
Rm 114	Perm Ex	P-160	Unknown	
D== 440	Perm Ex	P-160	Unknown	
Rm 112	Perm Ex	P-160	Unknown	
	Perm Ex Admin	P-160	Unknown	
Office Door Out	Perm Ex	P-160	Unknown	
Paula's Office	Perm Ex	P-160	Unknown	
Counslors Office to Courtyard	Perm Ex	P-160	Unknown	
	uilding 1331			
	Gym			
Main Entrance Front Door	1.50		228546	
Exit, Double Door			228524	
UAS Side Exit Doors Closest to Bath	room		228514	
			228532	
Exit By Climbing Wall			228543	
Exit By Mats			228563	
2 Exits in Weight Room			Unreadable	
			Unreadable	
Exit Besides Teachers Lounge			228511	
Exit Outside			228531	
	rooms Upstairs		. 220522	
Science Wing Side Double			228523	
Adjacent Mr Hunter's Room			228527 228541	
Adjacent wil Hunter's NOOM			228550	
			220000	

**\** 

## Building 292 Boys Dorm

Double Signs RA Station 22	28540
	28548
	28562
22	28572
South Wing Double Sign 22	28571
22	28508
Outside Exit, South Wing 22	28559
	28670
2nd Floor- Noth Hall	
	28567
· · · · · · · · · · · · · · · · · · ·	28566
	28569
	28547
2nd Floor- South Hall	
	28537
	28566
Building 290 Kitchen	
	28538
	28555
2년 시간 10년 10년 11년 12년 12년 12년 12년 12년 12년 12년 12년 12	28556
Boiler Room	
	28554
	28564
ETT/ Video Production	
	28560
Cafeteria	
Exit from Cafeteria to Outside 22  2nd Floor	28853
	00500
Building 293	38522
NEW MARK TO THE PROPERTY OF TH	28507
1 (A. 1)	28506
	28505
· ·	28556
	28529
	28528
	28530
2nd Floor	.0000
	28561
	28504
Double Exit Top of Stairs 22	28557
	28536
Building 293	
Entrance Brenoa Hall 22	28503
Exit Outside Brenda 22	28535

58 signs were identified during this search. This inventory was completed in response to the email from the Commissioner's office on 10-26-09 and the NRC's Demand For Information (DFI). All signs now located in Hazmat Cage at DOT HQ on Peger Road.

DOT&PF buildings and other agency buildings maintained on RSA were searched; Rabinowitz Courthouse, Fairbanks Regional Office Building, Fairbanks Public Health Center, Fairbainks Hunter Education, HSS Fahrenkamp and Denardo facilities, Fairbanks DNR Headquarters. Three Northern Region signs from the NRC list delivered to the Fairbanks Armory. They are not accessible by DOT&PF staff. Jim Graham from Military & Veteran Affairs was asked for help. He will inventory the building during his next trip to Fairbanks, early December. UPDATES: 12-9-2009, Jim Graham reported that the Fairbanks Armory has no tritium signs AND the Department of Public Safety dropped off 16 Tritium

Update 1-20-2010 logged all Jim River signs and Saint Mary's signs as moved to Peger Hazmat Cage.

Corrected error on 12-09 inventory: Signs on that inventory listed as from DPS were in fact delivered from Jim River Station. They were dropped at the office without paperwork and assumed to be from DPS due to prior discussion with DPS staff. They were not additional signs but were logged in as such. The removal of the duplicated records reduced the total sign inventory to 58.

	Model #	Serial #	Manufacture	Location	Disposition
1	T-4001	17006	NRD	Peger Rd Hazmat Cage	Intact - On NRC List
2	T-4001	17007	NRD	Peger Rd Hazmat Cage	Intact - On NRC List
3	2040	A4N806	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
4	2040	A4N807	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
5	2040	A4N811	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
6	2040	A4N813	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
7	T-4001	36363	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
8	T-4001	36364	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
9	T-4001	36365	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
10	T-4001	36366	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
11	T-4001	36367	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
12	T-4001	36368	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
13	T-4001	36369	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
14	T-4001	36370	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
15	T-4001	36371	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
16	T-4001	36372	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
17	T-4001	36374	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
18	T-4001	36375	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
19	T-4001	36376	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
20	T-4001	36377	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
21	T-4001	36378	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
22	T-4001	36379	Stusser-NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
23	700-C-10	5011	Omniglo	Peger Rd Hazmat Cage	Intact - Not on NRC list
24	700-C-10	5016	Omniglo	Peger Rd Hazmat Cage	Intact - Not on NRC list
25	2040	D18259	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
26	2040	D18260	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
27	2040	D18261	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
28	2040	D18262	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
29	2040	D18263	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
30	2040	D18264	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
31	2040	D18265	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
32	2040	D18266	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
33	2040	D781449	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list

### NR Tritium Sign Inventory January 20, 2010

34	2040	D781450	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
35	2040	D781451	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
36	2040	D781452	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
37	2040	D781453	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
38	T-4001	31333	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
39	T-4001	31334	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
40	T-4001	32536	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
41	T-4001	32587	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
42	T-4001	32589	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
43	T-4001	32590	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
44	T-4001	32595	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
45	T-4001	32602	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
46	T-4001	32603	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
47	2000	A112141	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
48	2000	A112142	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
49	2000	A112143	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
50	2000	A112144	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
51	2000	A112145	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
52	2000	A112146	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
53	2000	A112147	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
54	2000	A112148	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
55	2000	A112149	Safety Light Corp	Peger Rd Hazmat Cage	Intact - Not on NRC list
56	T-4001	12214	NRD	Peger Rd Hazmat Cage	Intact - On NRC List
57	T-4001	9523	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list
58	T-4001	9524	NRD	Peger Rd Hazmat Cage	Intact - Not on NRC list

Compiled by Steve Meierotto, Northern Region Building Maintenance Manager. 451-2203

## Tritium Signs from DPS

Model	Serial #	Manufacurer
T-4001	36363	NRD
T-4001	36365	NRD
T-4001	36366	NRD
T-4001	36367	NRD
T-4001	36369	NRD
T-4001	36370	NRD
T-4001	36371	NRD
T-4001	36372	NRD
T-4001	36374	NRD
T-4001	36375	NRD
T-4001	36376	NRD
T-4001	36377	NRD
T-4001	36378	NRD
T-4001	36379	NRD
T-4001	Unknown	NRD
T-4001	Unknown	NRD
- Will		

#### Tritium Signs for Disposal January 20,2010

		1		
1	700-C-10	5011	Omniglo	Peger Rd Hazmat Cage
2	700-C-10	5016	Omniglo	Peger Rd Hazmat Cage
3	2040	D18259	Safety Light Corp	Peger Rd Hazmat Cage
4	2040	D18260	Safety Light Corp	Peger Rd Hazmat Cage
5	2040	D18261	Safety Light Corp	Peger Rd Hazmat Cage
6	2040	D18262	Safety Light Corp	Peger Rd Hazmat Cage
7	2040	D18263	Safety Light Corp	Peger Rd Hazmat Cage
8	2040	D18264	Safety Light Corp	Peger Rd Hazmat Cage
9	2040	D18265	Safety Light Corp	Peger Rd Hazmat Cage
10	2040	D18266	Safety Light Corp	Peger Rd Hazmat Cage
11	2040	D781449	Safety Light Corp	Peger Rd Hazmat Cage
12	2040	D781450	Safety Light Corp	Peger Rd Hazmat Cage
13	2040	D781451	Safety Light Corp	Peger Rd Hazmat Cage
14	2040	D781452	Safety Light Corp	Peger Rd Hazmat Cage
15	2040	D781453	Safety Light Corp	Peger Rd Hazmat Cage

# Health and Social Services Facilities Section NRC Exit Sign Survey

Facility	Physical Address	City	Tritium Signs	Amount	Expiration Date
Anchorage Pioneers' Home	923 West 11 <sup>th</sup> Ave. FAX 343-7272	Anchorage 99501	None		
Juneau Pioneers' Home	4675 Glacier Hwy. FAX 780-4765	Juneau 99801-9518	None		
Fairbanks Pioneers' Home	2221 Eagan Ave. FAX 452-1070	Fairbanks 99701-5709	None		
Ketchikan Pioneers' Home	141 Bryant Street FAX 225-4115	Ketchikan 99901-5575	None		
Palmer Pioneers' Home	250 E. Fireweed FAX 745-0230	Palmer 99645-6699	None		
Sitka Pioneers' Home	120 Katlian Street FAX 747-2115	Sitka 99835-7585	None		
Bethel Youth Facility	PO Box 1989 FAX 543-2710	Bethel 99559	Yes	13	2016
Fairbanks Youth Facility	1502 Wilbur Street FAX 451-5152	Fairbanks 99701	Yes	21	20 years from install date
Johnson Youth Center	3252 Hospital Drive FAX 586-2680	Juneau 99801	Yes	7	20 years from install date
Kenai Youth Facility	405 Marathon Road FAX 335-3134	Kenai 99611	None		
Ketchikan Reg. Youth Facility	3058 Fifth Avenue FAX 247-8900	Ketchikan 99904	None		
Mat-Su Youth Facility	581 Springer Loop Rd. FAX 761-7249	Palmer 99645	Yes	2	2020
McLaughlin Youth Center	2600 Providence Dr. FAX 261-4321	Anchorage 99508	None		

Facility	Physical Address	City	Tritium Signs	Amount	Expiration Date
Nome Youth Facility	PO Box 1750 443-7295	Nome 99762	None		
Assets Building	2330 Nichols Street FAX 274-0636	Anchorage 99508	None		
Denardo Center	1300 Moore Street	Fairbanks 99701	None		
Fahrenkamp Center	1423 Peger Road	Fairbanks 99709	None		
Yukon Flats Care Center			No Longer Our Facility		
Dillingham Health Center	125 Main Street	Dillingham 99576	None		
Ketchikan Health Center	3054 Fifth Street	Ketchikan 99901	Yes	8	2011
Fairbanks Health Center	1025 W. Barnett	Fairbanks 99701	None		
Juneau Health Center	3412 Glacier Highway	Juneau 99801			
Anchorage Public Health Lab	4500 Boniface Pkwy.	Anchorage	Yes	8	2010
Alaska Psychiatric Institute	2800 Providence Dr. FAX 269-7128	Anchorage 99508-4677	None		
Sitka Public Health Center	Moller Ave.	Sitka	None		
State wide	Dept. wide	Total:		59	