

October 8, 2010



Jack Foster, Branch Chief
Licensing Branch
Division of Materials Safety
and State Agreements
Office of Federal and State Materials
and Environmental Management Programs
Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Foster,

I am in receipt of your letter dated September 28, 2010 regarding noncompliance of certain licensing requirements by Halco Lighting Technologies reported by Covington & Burling LLP, on our behalf, to the NRC in July 2010.

First, I would like to express my appreciation for the NRC's decision not to pursue enforcement action against Halco. Please find my answers to the questions set forth in your letter, below.

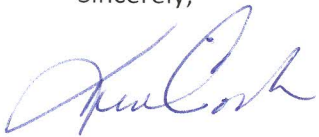
You asked how we became aware of the need to obtain licensing. In April 2010, while at a tradeshow in Frankfurt, Germany, one of our vendors inquired if we had the necessary licenses and challenged our view, at that time, that licensing was unnecessary. This difference of opinion prompted us study our entire supply chain, contact the National Electrical Manufacturer's Association, contact Bruce Carrico with the NRC, and consult with Covington & Burling. We then concluded that licensing was necessary and immediately suspended the import and distribution of the Kr-85 lamps, self-reported this matter to the NRC, and began to prepare the necessary NRC and Georgia license applications.

As to your second question, the products we have requested for exempt distribution are the same products that were imported over the last five years.

P.O. Box 2834 Norcross, GA 30091-2834 • www.halcolighting.com
770.242.3612 • 800.677.3334 • FAX: 800.880.0822



Sincerely,



Kim Cook

COO

Cc: Nima Ashkeboussi, NRC

Allan Nelkin, Halco

Richard A. Meserve, Covington & Burling, LLP

Robert Fleishman, Covington & Burling, LLP