



**AMGLO KEMLITE LABORATORIES, INC.**  
**HALOGEN LAMP DIVISION**

8787 ENTERPRISE BLVD.  
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TO: U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

COPY: U.S. Nuclear Regulatory Commission  
Regional Administrator, Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415

FROM: Patricia Garst  
Assistant Radiation Safety Officer  
Amglo Kemplite Laboratories, Inc.  
8787 Enterprise Blvd.  
Largo, FL 33773

DATE: December 13, 2010

RE: License No. 09-23866-01E  
Docket No. 03035149

**Reply to a Notice of Violation**

Dear Sir or Madam:

Amglo Kemplite Laboratories, Inc. received a notice of violation (Docket No. 03035149) November 16, 2010, postmarked November 9, 2010 and dated November 1, 2010. Amglo is not contesting the violation. We apologize that the response will be received in excess of 30 days from the date the violation notice was written. We also would like you to consider the actual response time and the fact that corrective actions have already been implemented.

(1) The reason for the violation:

Our Marketing and Purchasing Departments created an order for the Kr-85 lamp box, but were unaware of our license requirements due to the special nature of this product. They believed that a corporate logo and a sticker was an acceptable label. In addition, the label was incorrectly marked as "<30 MICROCI KR-85" rather than the correct marking of "Exempt quantity Kr-85". Lamps containing Kr-85 are a very small part of the total sales and shipping volume, so these departments have not dealt with them on a routine basis.

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(2) The corrective steps that have been taken and the results achieved

The shipping volume is low enough that the boxes can be stamped using a hand stamp with black ink as confirmed in a telephone conversation with Mr. Lawyer, NRC Inspector. No Kr-85 lamp shipments will take place without a permanent marking on the box:

**Anglo Kemlite Laboratories, Inc.**

**Exempt quantity Kr-85**

The Marketing and Purchasing Departments have been informed of the special requirements for these boxes and educated as to proper procedures and the need to communicate with the RSO and Assistant RSO. As a result, everyone is now aware of the procedures and that a permanent marking with the exact wording specified in the NRC Exempt Distribution License and any applicable correspondence must be applied.

(3) The corrective steps that will be taken to avoid further violations

Anglo is having a drawing created of the box, which will have the PERMANENT marking with the correct wording of our exempt quantity of Kr-85. This drawing will become a permanent part of each lamp's B.O.M., and as we re-order this box, the drawing will prevent any unaware marketing or purchasing staff person from omitting this wording. This adds a layer of protection above and beyond personnel training. Training will also emphasize that they are NOT to use these specially labeled boxes to ship lamps that do not contain Kr-85 under any circumstances.

In addition, beginning with the 2011 ALARA review, the RSO and consultant will review packaging materials, drawings for the packaging materials, and potential orders for packaging materials.

(4) The date when full compliance will be achieved

Compliance has been achieved as of the date of this response (December 13, 2010) because staff members have been informed of the license requirements and trained to use the proper terminology and permanent markings. These markings can be applied directly to boxes using permanent black markers or hand stamps.

Sincerely,



Patricia Garst  
Assistant Radiation Safety Officer  
Anglo Kemlite Laboratories, Inc.