

U.S. NUCLEAR REGULATORY COMMISSION

Date:

May 17, 2012

TELEPHONE CONVERSATION RECORDMail Control
or Report No(s).

License No(s).

29-23795-02E

Docket No(s).

03032495

Name of Licensee: LVMH

Name of Participant(s): Francois-Xavier Lamy, LVMH and Todd Jackson, USNRC Region I

Telephone No. 973-467-1890, ext. 9167

Subject: NRC E distribution license for LVMH
(NOTE: This will be used as the Documents Title in ADAMS)

Mr. Lamy called me back regarding a voice message I had left him earlier in the week, following up on my commitment to him during the 5/3/12 inspection that I would determine the need for an NRC E distribution license to distribute parts (hands and dials containing tritium) by installing them into exempt (already distributed) timepieces. In the message I stated that an NRC exempt distribution license is required for the initial distribution of new parts containing tritium installed into exempt watches during repair. I had discussed this internally with Lymari Sepulveda (E distribution licensing in HQ), and with my branch including Betsy Ullrich and Judy Joustra. We also consulted NRC licensing guidance found in ML103440126 regarding redistribution of backlighted dials.

Mr. Lamy stated that the only licensed material LVMH is currently using are repair/replacement parts that were imported around 2004 by LVMH and transferred (distributed) to Protime, which was a separate company at the time. LVMH has since absorbed Protime so they are no longer separate companies. LVMH has been repairing watches which they previously distributed, and has been sending parts (hands or dials) which were in Protime's inventory when the companies merged to other authorized repair shops. Mr. Lamy stated they would no longer be sending the parts to other shops and would only be using their inventory of parts in-house to repair customer watches. He stated that LVMH would not be the initial distributor for any parts or new timepieces containing tritium from this point onward and therefore would not require any NRC E distribution license.

Based on Mr. Lamy's statement that all the parts (hands or dials) now in inventory were previously distributed as exempt per 10 CFR 30.15(a) and LVMH is no longer importing for distribution timepieces or hands or dials, it does not appear that the activities of repairing previously distributed timepieces using previously distributed hands or dials require an NRC E distribution license.

Action Required: None

Document Availability:



Publicly Available



Non-Publicly Available

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