

**From:** Kjbonawitz@aol.com  
**Sent:** Friday, March 06, 2009 11:46 AM  
**To:** Struckmeyer, Richard  
**Subject:** Re: Follow-up on Question 11  
**Attachments:** nrc quality file tienen 7.pdf; nrc Quality\_Requirements\_CFAE-00\_octubre\_2008.pdf

Richard, thank you for the clarification. Attached are quality procedures we use in our manufacturing plants that prevent the distribution of defective lamps. I've copied you on one of our HID lamps and starters.

Kevin

Mr. Bonawitz:

Question 11 in my Request for Additional Information letter dated December 17, 2008, stated the following:

"Title 10, Code of Federal Regulations, Section 32.15(c) requires that no person licensed under §32.14 shall transfer to other persons for use under §30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product. Please describe how you shall prevent transfer to other persons for use under §30.15 of this chapter or equivalent regulations of an Agreement State any defective part or product."

The response you provided in your letter of February 6, 2009, was: "I am in charge of R&D and quality for Sylvania in the Americas. All defective lamps returned by US customers are reviewed."

It appears that you may have misunderstood the intent of this regulation, and therefore the reason for my question. The intent is to have the applicant describe how it will prevent distribution of defective products.

The return of defective products from customers is not relevant. The issue that you should address is how your company prevents defective products that might be produced within the manufacturing process from being distributed to customers.

For completeness and clarity, this question should be answered as fully as necessary to demonstrate that your manufacturing, quality control, and/or other internal processes will prevent distribution of defective products.

Please do not refer to the answers already provided in your previous responses.

Please contact me if you would like additional clarification.

Thank you,

Richard K. Struckmeyer  
Division of Materials Safety and State Agreements  
Office of Federal and State Materials and Environmental Management Programs  
U.S. Nuclear Regulatory Commission

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