



May 31, 2013

Judith A. Joustra, Chief
Commercial and R&D Branch
Division of Nuclear Material Safety

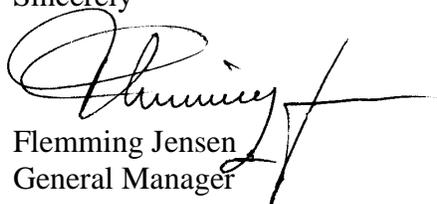
Dear Judith Joustra

This is in response to your letter dated May 8, 2013. You had requested more information.

1. You requested a copy of the SOP we have created for managing KR85 containing products. I have attached a copy of this procedure. This procedure was reviewed with our warehouse personnel after it was written and is now part of the “on boarding” process we have with all new warehouse people when they are hired. We also review and refresh the procedure with them on a quarterly basis as we do all other safety procedures. As you will note the procedure deals not just with the inspection and markings of the KR85 containing products but also with the disposal of said product.
2. As for submitting the reports required in 10 CFR 32.16 it has been a little bit of a challenge. As I have explained before we changed computer system in October of last year and I am having a very hard time digging up old data, however for the future we have done the following.
 - a. Established a report in our new computer system that will generate this data after we close the year on Dec 31.
 - b. Assigned the generation of the report to our sales and marketing analyst. It is a standard part of the job responsibility of that position so if the person changes the new person will take over the responsibility.
3. As for the training and refresher I described that in point 1 above.

I hope this answers your questions, if not please let me know.

Sincerely



Flemming Jensen
General Manager

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General Manager
HAVELLS USA