

From: [Flores, Nancy](#)
To: [Xu, Shirley](#)
Cc: [Svalstad, Neal](#); [Camacho, Juan](#)
Subject: Hitachi License No 04-23985-01E
Date: Tuesday, August 20, 2013 5:32:42 PM
Attachments: [Letter to Xu - 08-20-13.pdf](#)
[Letter to R Rogus - CA amendment of possession license - 7-29-13.pdf](#)

Dear Ms. Xu,

Please find attached a letter acknowledging receipt of your letter to Mr. Svalstad dated August 12, 2013 and a courtesy copy of Hitachi's application with the California Department of Public Health, Radiologic Health Branch. Please let me know if you have any trouble opening any of the documents.

Please note hard copies will not follow.

Sincerely,

Nancy H. Flores, CLA

Hitachi America, Ltd.

Digital Media Division | Legal Department

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VIA FEDERAL EXPRESS AND ELECTRONIC MAIL (ronald.rogus@cdph.ca.gov)

July 31, 2013

Ronald Rogus
Department of Public Health
Radiologic Health Branch
P.O. Box 997414, MS-7610
Sacramento, California 95899-7414

Re: Request for Amendment of License due to planned change of warehouse
location under License Number 7820-19.

Dear Mr. Rogus:

The purpose of this letter is to request your assistance in effecting an amendment to Hitachi America, Ltd. ("Hitachi") license number 7820-19 (for possession of Krypton-85, incident to exempt distribution; copy of Hitachi's license is enclosed herewith) in connection with the intended relocation, to a different Southern California warehouse, of the goods covered by its California state possession license.

Accordingly, Hitachi respectfully requests that your office issue an amendment of Hitachi's existing license that would replace the approved warehouse location set forth under Item 10(a) of the license with the following address:

4091 E. Francis Street
Ontario, California 91761

Hitachi is not requesting any other amendments or modifications to its license.

For purposes of clarity, please note that although Hitachi completed the relocation of its general inventory on July 15, 2013, Hitachi has not yet moved or relocated any goods covered by its California possession license (i.e., Kr-85-containing projectors and Kr-85-containing replacement lamps).

Hitachi will not relocate any of its Kr-85-containing projectors or replacement lamps until your office, as well as the U.S. Nuclear Regulatory Commission, each has issued an amendment approving the requested warehouse relocation.

After those amendments both have been issued and upon completion of the removal of Hitachi's Kr-85 goods, Hitachi's Radiation Safety Officer will perform a detailed, on-site inspection of the vacated Carson, California warehouse to ensure that all Kr-85 containing projectors and replacement lamps have been properly removed, relocated and entered into inventory at the new Ontario, California location. Following that relocation, Hitachi will submit a copy of the Radiation Safety Officer's closing inspection and inventory transfer and entry to your office.

In addition, Hitachi's Radiation Safety Officer will be in charge of ensuring that all existing safety-related signage, physical barriers, policies, procedures and practices are fully implemented at the new Carson, California warehouse and that all related business and compliance records, standard operating procedures, forms and reference materials are properly and completely moved to such new warehouse.

Hitachi wishes to note that this relocation will not represent a significant operational change for Hitachi for the following reasons:

- A. Hitachi's existing Radiation Safety Officer, Mr. Juan Camacho, will continue in this role at the new warehouse, and he will be charged with ensuring that all existing safety precautions, signage, product segregation, recordkeeping processes and operational and inventory tracking protocols used at the Carson, California warehouse will be fully implemented and followed at the new Carson, California location.
- B. The third party operator of the new warehouse in Carson, California (Expeditors International of Washington, Inc.) is the same company that has been operating Hitachi's warehouse in Carson, California for the past two years. Hitachi is simply transferring existing inventory to a different Expeditors location.

July 31, 2013

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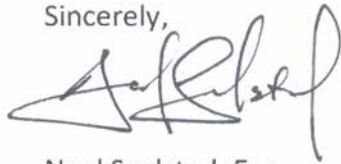
Accompanying this amendment request letter are the following exhibits:

- Exhibit 1:* Maps and exterior aerial photo of the new warehouse location
- Exhibit 2:* Interior site usage diagram identifying planned storage of Kr-85-containing products
- Exhibit 3:* List of security measures that will be implemented at the new warehouse location (i.e., consistent with existing practices)

Thank you in advance for your support and attention to this amendment request. It is greatly appreciated.

If you have any questions, please do not hesitate to contact me by email (neal.svalstad@hal.hitachi.com) or telephone (619-591-5337).

Sincerely,



Neal Svalstad, Esq.
Senior Corporate Counsel

cc: Juan Camacho (Radiation Safety Officer, Hitachi America, Ltd.)
Melissa Gibson (Hitachi America, Ltd.)

ATTACHMENTS: Please see *Exhibits 1, 2 and 3* attached hereto

EXHIBIT 1

**Maps and exterior aerial photo of
the new warehouse location**

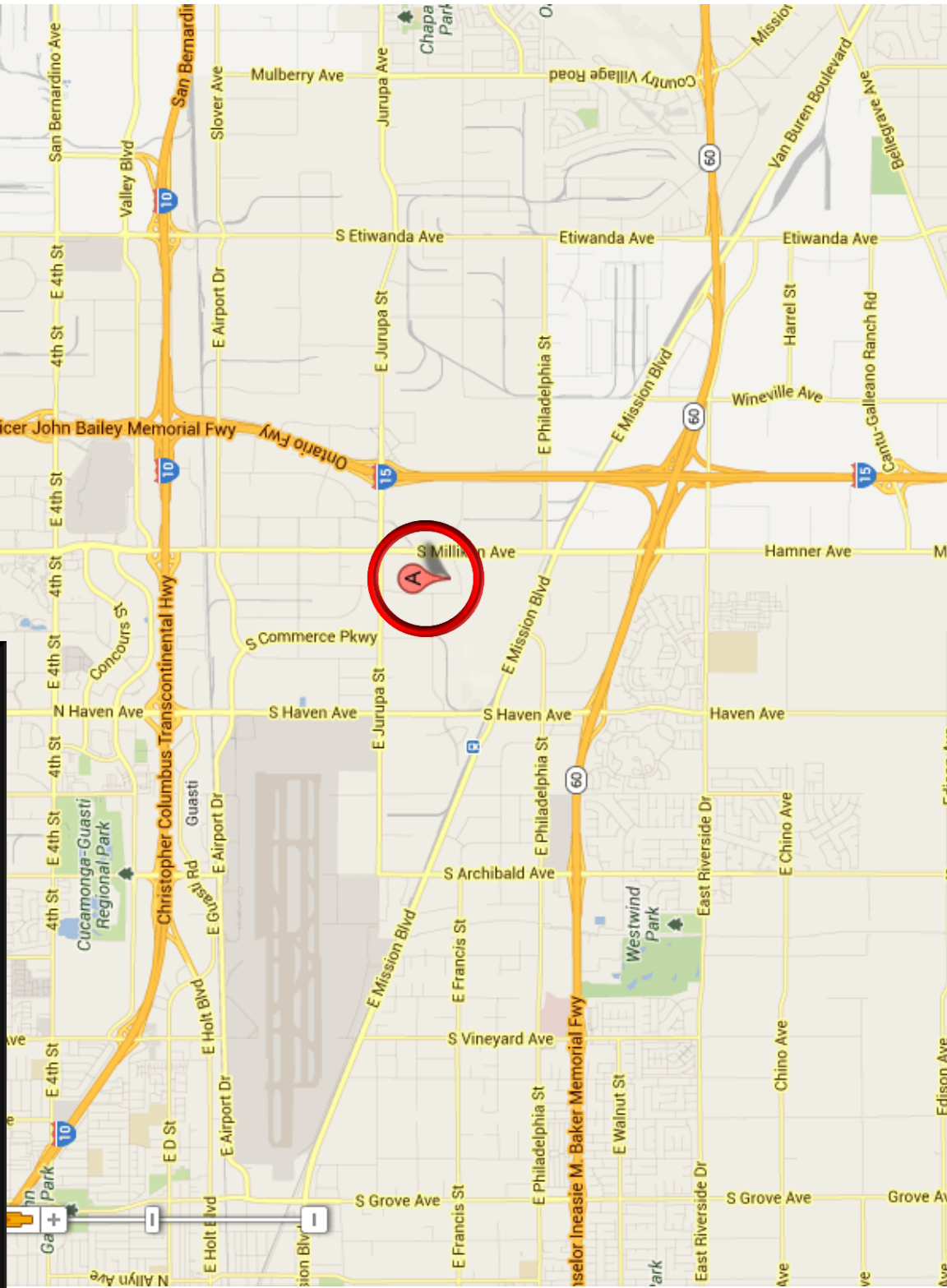
Please see following pages.

Map of Hitachi's New Warehouse

>Expeditors International of Washington, Inc.

>4091 E. Francis Street

>Ontario, California 91761



Aerial View of Hitachi's New Warehouse
>Expeditors International of Washington, Inc.
>4091 E. Francis Street
>Ontario, California 91761

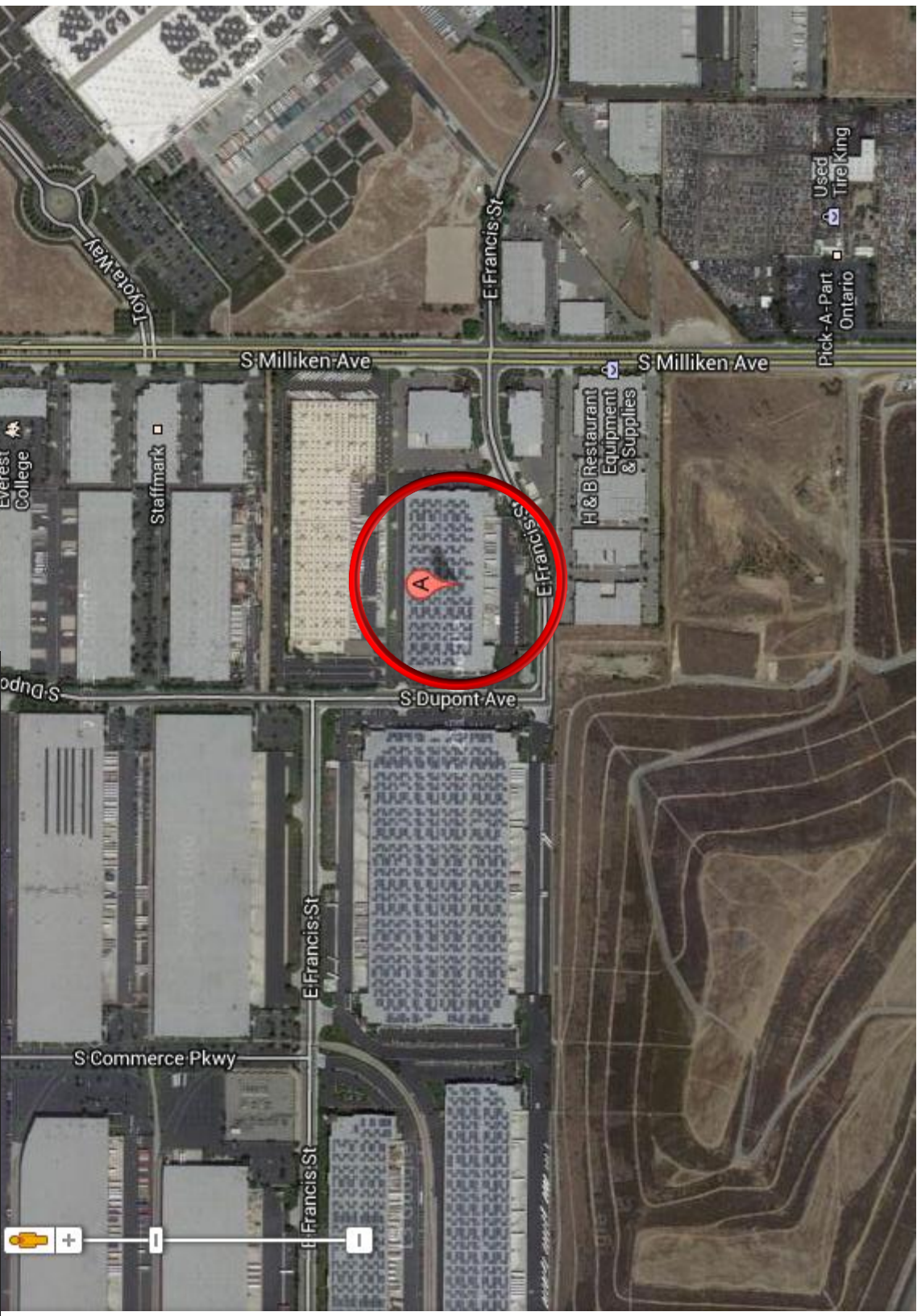


EXHIBIT 2

**Interior site usage diagram identifying planned storage of
Kr-85-containing products**

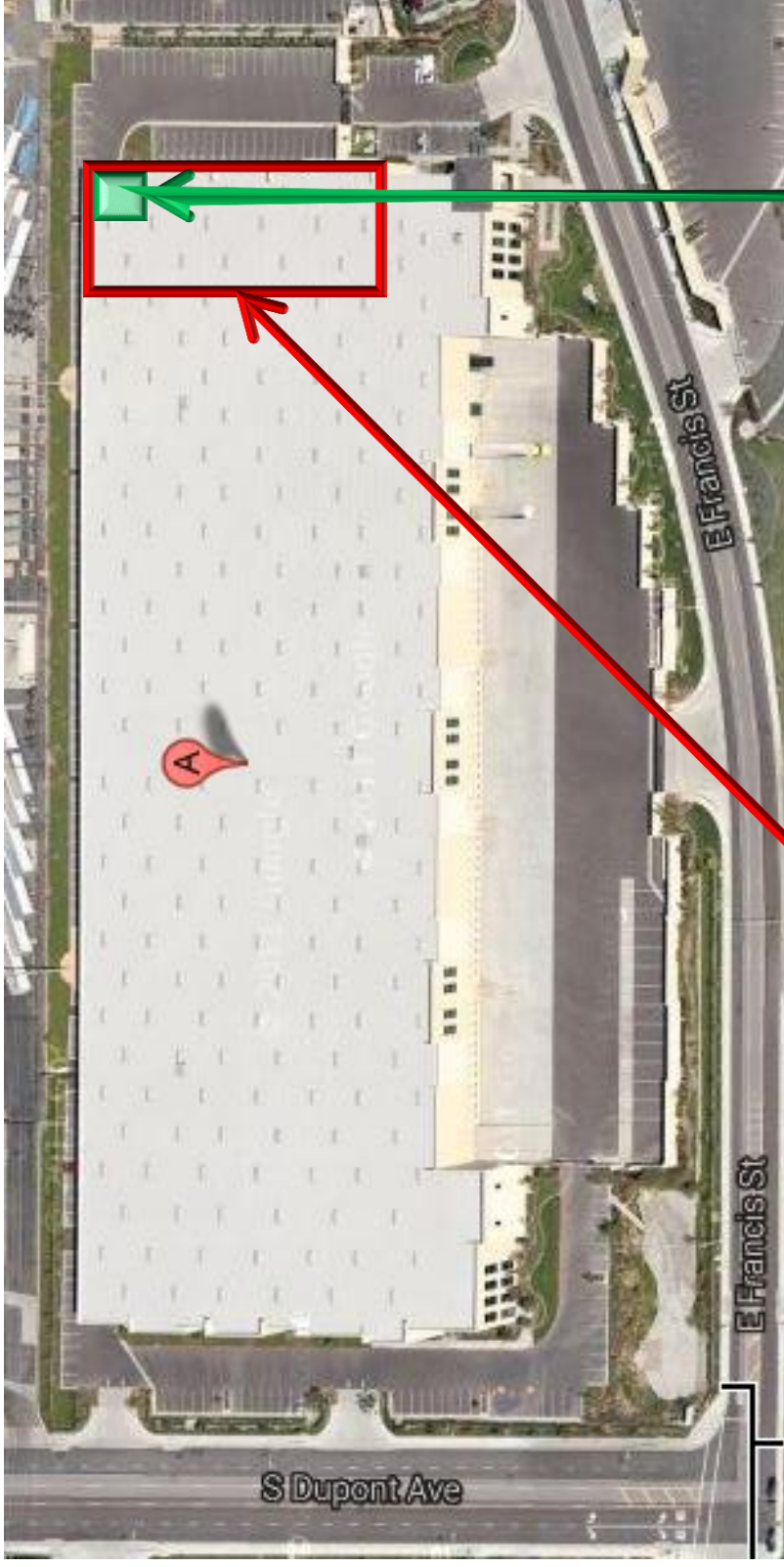
Please see following pages.

Aerial Close-up View of Hitachi's New Warehouse

>Expeditors International of Washington, Inc.

>4091 E. Francis Street

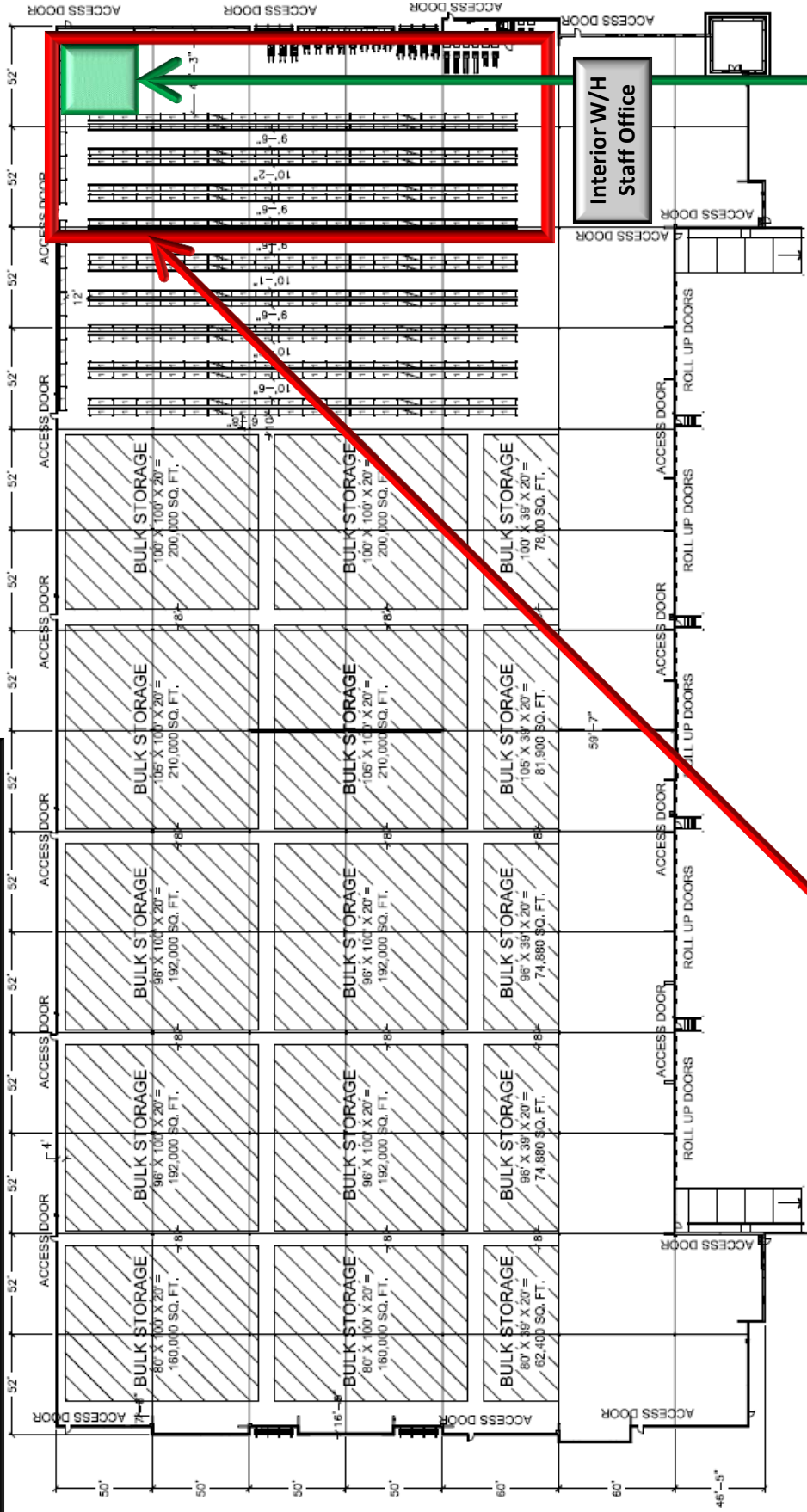
>Ontario, California 91761



Storage area for all Hitachi projector and lamp products.

Planned segregated storage area for Hitachi Kr-85 products.

Interior Map of Hitachi's New Warehouse
 >Expeditors International of Washington, Inc.
 >4091 E. Francis Street
 >Ontario, California 91761



Storage area for all Hitachi projector and lamp products.

Planned segregated storage area for Hitachi Kr-85 products.

EXHIBIT 3

List of security measures that will be implemented at the new warehouse location

(i.e., consistent with existing practices)

1. Kr-85-containing projectors and replacement lamps will be segregated in the northeast corner of the warehouse, ensuring it is located in the area with the lowest possible level of foot traffic and dolly/pull-cart/forklift traffic. Warehouse staff will have sightlines to this segregated area from the warehouse management office.
2. Kr-85-containing projectors and replacement lamps will be cordoned off from all other inventory with optic yellow chain and "Radioactive Materials" sign that must be physically disconnected before entry is possible.
3. Kr-85-containing projectors and replacement lamps will be stored on dedicated warehouse shelving that is separated from, and never comingled with, ordinary projector, replacement lamp and accessory inventory. Affixed to the base of every such shelf will be a yellow sign that reads "Radioactive Materials."
4. Inside the segregated area for Kr-85-containing projectors and replacement lamps will be a large plastic-lined receptacle, with a lid, specifically for collection of any projectors or lamps that may be damaged during handling. Copies of Hitachi's "Kr-85 Projector/Lamp Incident Report Form" are located immediately next to this receptacle.
5. The warehouse's Standard Operating Procedures require that Hitachi's Radiation Safety Officer be contacted immediately if any such damage occurs and that a completed and signed Incident Report must be submitted to the RSO. If the RSO is not personally at the warehouse at the time of such incident, the RSO is required to immediately report to the warehouse to inspect any damaged product and ensure proper disposition thereof.
6. All Hitachi inventory, including Kr-85-containing projectors and replacement lamps, will be subject to monthly cycle counts and, twice per year, full inventory counts. Inventory is electronically scanned upon entry and removal to ensure accurate tracking and recordkeeping.
7. All newly arriving Kr-85-containing projectors and replacement lamps will be required to be moved into the segregated storage area promptly upon receipt at the warehouse.
8. The Expeditors International of Washington warehouse in Carson, California to which Hitachi will move its Kr-85-containing projector and replacement lamp inventory, like the existing warehouse in Carson, California, is C-TPAT compliant and is subject to strict warehouse security and access restrictions. Hitachi's inventory will never be comingled with the inventory of any other party.

Via Electronic Mail Only

August 20, 2013

Shirley S. Xu
Office of Federal and State Materials
and Environmental Management Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Re: Hitachi Application for Amendment
License No. 04-23985-01E

Dear Ms. Xu,

Hitachi is in receipt of your correspondence dated August 12, 2013 regarding the request for additional information concerning Hitachi's Application for Amendment.

Please be assured that we will provide a copy of Hitachi's amended license from the State of California reflecting the new location as soon as it is issued. For the moment, please find enclosed a courtesy copy of Hitachi's request for Amendment of License due to planned change of warehouse location to the California Department of Public Health, Radiologic Health Branch submitted on July 31, 2013.

Please contact me in the event you have any questions or comments regarding this matter. I may be reached at 619-591-5337 or by email at neal.svalstad@hal.hitachi.com.

Thank you for your attention to his matter.

Very Truly Yours,
/s/ Neal Svalstad

Enc.
cc: Juan Carlos Camacho (Radiation Safety Officer)