

03038282

VIA FEDERAL EXPRESS

September 13, 2013

Margie Kotzalas
Branch Chief
U.S. NRC/FSME/MSSA/LB
Mail Stop: T8E24
Washington, D.C. 20555-0001

Re: Request to Amend USNRC License due to Warehouse Relocation.

Dear Ms. Kotzalas:

The purpose of this letter is to resubmit a request to amend Hitachi America, Ltd.'s United States Nuclear Regulatory Commission License No. 04-23985-01E in connection with the intended relocation, to a different Southern California warehouse, of the goods covered by its USNRC license.

Hitachi America, Ltd. submitted this request to your attention at the same time that it submitted its application to amend its existing California possession license (No. 7820-19) with the California Department of Public Health Radiologic Health Branch. Unfortunately, there were significant delays in the California Department of Public Health Radiologic Health Branch's issuance of that amendment, but we have been informed that the California license amendment will be issued in the coming week.

Accordingly, Hitachi respectfully renews its request that your Branch issue an amendment to Hitachi's existing USNRC license that would effect the following changes:

- (i) Under Item 2 (Licensee Address), please replace the existing information with the following Licensee Address:

4091 E. Francis Street
Ontario CA 91761

- (ii) Under Item 11 (Condition), please replace the existing information with the following Condition:

581704

The licensee is authorized to distribute only from its facilities located at: Expeditors International of Washington, Inc.
4091 E. Francis Street,
Ontario CA 91761

Hitachi is not requesting any other amendments to its license at this time.

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 US Nuclear Regulatory Commission distribution license (i.e., Kr-85-containing projectors and Kr-85-containing replacement lamps).

Hitachi will not relocate any of its Kr-85 projectors or replacement lamps until the US Nuclear Regulatory Commission, as well as the California Department of Public Health, each has issued an amendment approving Hitachi's requested warehouse relocation.

Simultaneously with its submission of this amendment request to USNRC, Hitachi has submitted a request to the California Department of Public Health to similarly amend its existing California possession license (No. 7820-19).

Once the California Department of Public Health's Radiologic Health Division issues an amendment to Hitachi's state possession license, Hitachi will submit a copy of that amendment to your attention. Hitachi recognizes that USNRC will not approve and finalize Hitachi's amendment request unless and until USNRC has received and verified Hitachi's issued California possession license amendment.

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.

In addition, Hitachi's Radiation Safety Officer will take steps to ensure 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:

EXHIBIT 1

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

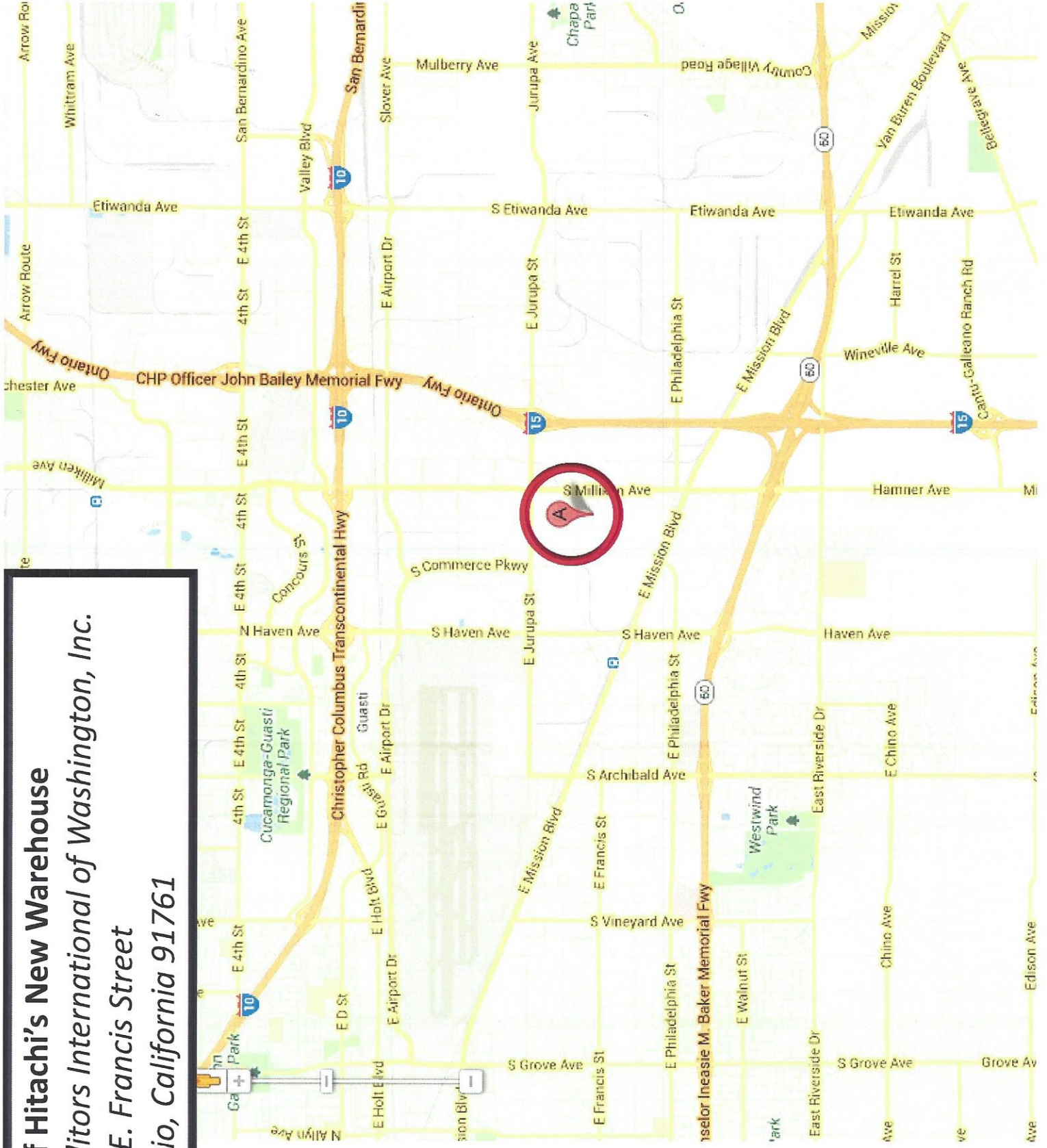
Please see following pages.

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

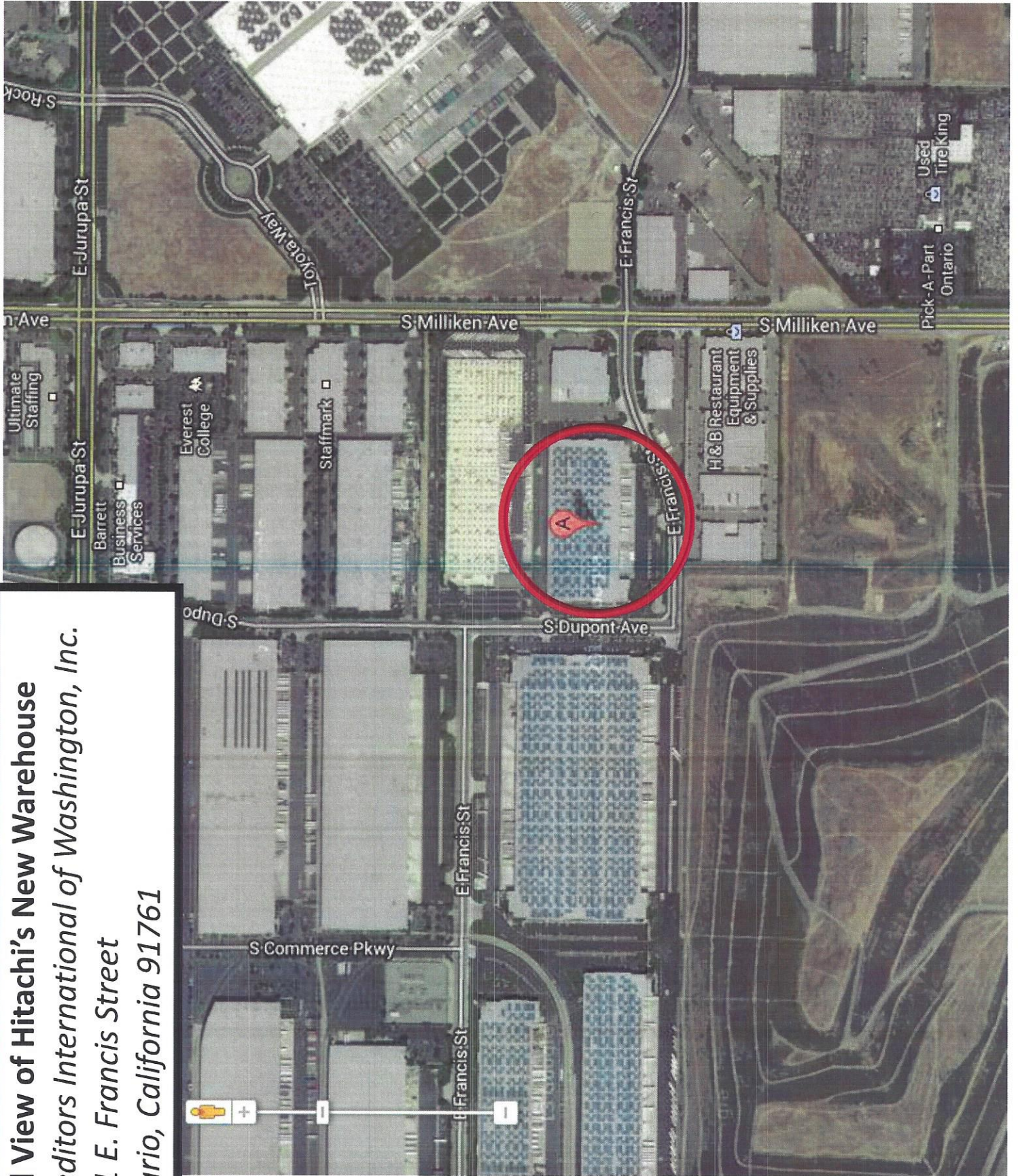


EXHIBIT 2

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

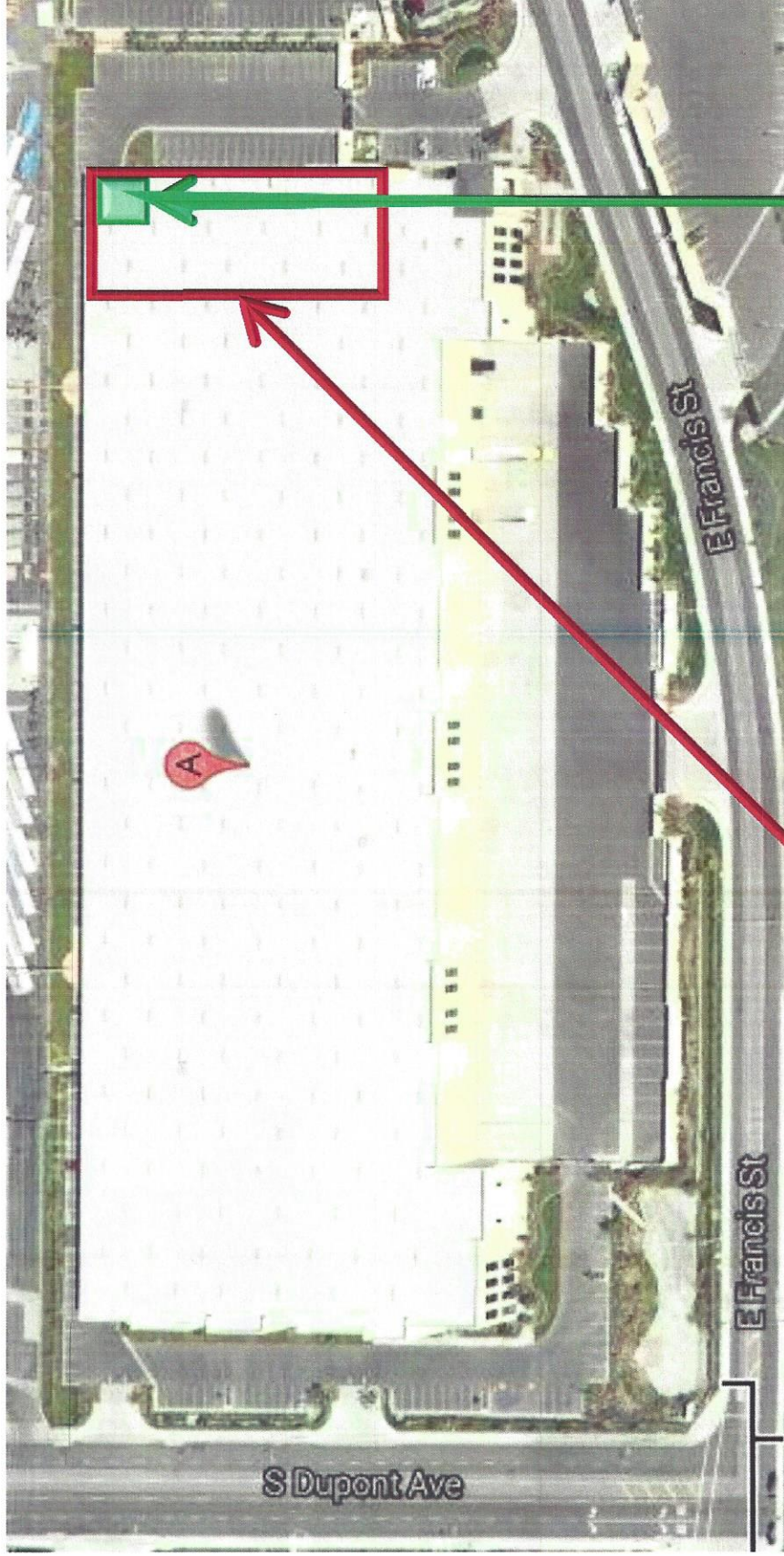
Please see following pages.

Aerial Close-up View of Hitachi's New Warehouse

>Expeditors International of Washington, Inc.

>4091 E. Francis Street

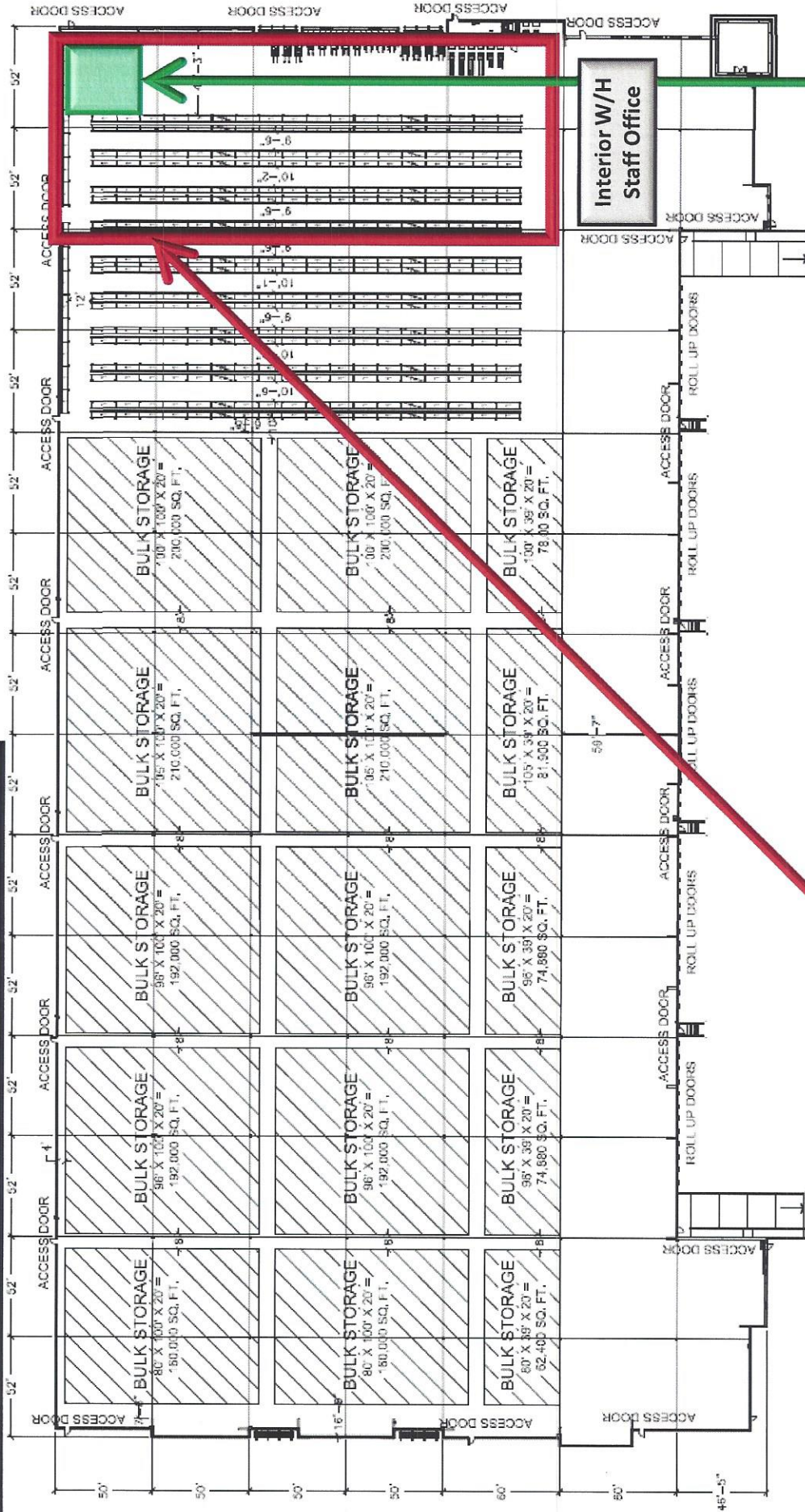
>Ontario, California 91761



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



Planned segregated storage area for Hitachi Kr-85 products.

Storage area for all Hitachi projector and lamp 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.

From: (619) 591-5336
Legal Department
HITACHI AMERICA, LTD., DMD
900 Hitachi Way

Origin ID: SDMA



J13201306280326

Chula Vista, CA 91914

Ship Date: 13SEP13
ActWgt: 1.0 LB
CAD: 101316626/NET3430

Delivery Address Bar Code



SHIP TO: (619) 591-5336

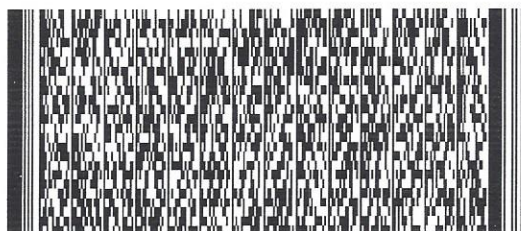
BILL THIRD PARTY

Margie Kotzalas
US NRC
FSME MSSA LB
Mail Stop T8E24
WASHINGTON, DC 20555

Ref # Legal Dept.
Invoice #
PO #
Dept # 221010

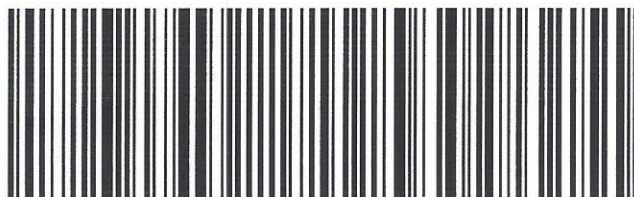
MON - 16 SEP AA
STANDARD OVERNIGHT

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