

August 4, 2014

Mr. Flemming Jensen, General Manager
Havells USA, Inc.
125 B Villanova Drive
Atlanta, GA 30336

SUBJECT: HAVELLS USA, INC., REQUEST FOR EXEMPT DISTRIBUTION ANNUAL
TRANSFER REPORTS

Dear Mr. Jensen:

After carefully reviewing our records, it appears that we do not have record of your exempt distribution transfer reports for the reporting periods from 2008 and 2012. Furthermore, the report you submitted for the 2013 transfer period did not include the required information, while providing an unnecessary level of detail for each individual order listed.

As you are authorized, under 10 CFR 32.14, to transfer certain products containing byproduct materials to individuals exempt from regulatory requirements, you must abide by the reporting requirements for your license, which are listed in 10 CFR 32.16. These requirements include the provision that you submit an annual report to the NRC detailing transfers taking place during the previous calendar year.

Pursuant to 10 CFR 32.16, you must include the following information in your annual transfer reports:

- identification of the licensee, including the license number;
- indication that the products transferred for use under 10 CFR 30.15 or equivalent Agreement State regulation(s);
- a description and/or identification of the type of each product, including the model number(s) (if applicable);
- the total quantity of each radionuclide contained in each type of product/model; and
- the number of units of each type of product transferred, by model number (if applicable), during the reporting period.

These reports do not need to list each individual transfer (e.g. by date or recipient) or each individual unit transferred (e.g. by serial number). Instead, these reports must list the total number of units of each device type or model transferred. Additionally, each report should indicate the period of time that it is covering. Also, if no transfers take place during a given reporting period, you are still required to submit a report stating so explicitly.

Pursuant to the regulations, your annual transfer reports must be submitted by January 31 each year, covering transfers that took place during the preceding calendar year. You should submit reports by mailing them to the following address:

ATTN: Document Control Desk/Exempt Distribution
Director, Office of Federal and State Materials
and Environmental Management Programs
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

or by some other means listed in 10 CFR 30.6(a).

Please submit copies of your reports for the 2008, 2009, 2010, 2011 and 2012 reporting periods, and please resubmit a corrected copy of your report for the 2013 reporting period, within 30 calendar days of the date of this letter, so that we may incorporate these reports into our records.

NRC review of your response to this letter will determine whether further action is necessary to ensure appropriate retention of annual transfer reports.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's Agencywide Documents Access and Management System (ADAMS). ADAMS is accessible from the NRC web site at <http://www.nrc.gov/reading-rm/adams.html>.

If you have any questions, or if your understanding differs from the above, please contact me at (301) 415-6684, or by electronic mail at Justin.Vazquez@nrc.gov; or contact Shirley Xu at (301) 415-7640, or by electronic mail at Shirley.Xu@nrc.gov.

Sincerely,

/ra/

Justin A. Vazquez,
Licensing Branch
Division of Materials Safety and State Agreements
Office of Federal and State Materials and
Environmental Management Programs

License No. 39-31336-02E
Docket No. 030-37866

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Licensing Branch
Division of Materials Safety and State Agreements
Office of Federal and State Materials and
Environmental Management Programs

License No. 39-31336-02E
Docket No. 030-37866

DISTRIBUTION:

MSSA r/f
RI/DNMS

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OFC	FSME/MSSA/LB	FSME/MSSA/LB
NAME	JVazquez	MKotzalas
DATE	08/05/2014	08/04/2014

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