



ENGELHARDT & ASSOCIATES, INC.

22 November, 2014

Mr. Richard Struckmeyer
Material Safety Licensing Branch
Division of Materials Safety, States, Tribal and Rulemaking Programs
Office of Nuclear Material Safety and Safeguards
Washington, DC, 20555
PH: 301-415-5477
EMAIL: Richard.Struckmeyer@nrc.gov
CONTROL NUMBER: 585020

Dear Mr. Struckmeyer:

Following is the response to your letter of 22 October, 2014 and subsequent phone conversation regarding the letter.

As you indicated, the E-Distribution License Number is **20-30024-02E, with an expiration date of 30 September, 2021.**

The Corporate RSO for this license is Mr. Peter Van Breda, Vice President of Logistics, AME. Mr. Van Breda is located at the Corporate Headquarters, located at 100 Endicott Street, Danvers, MA 01923. There are no radioactive materials located at this site; it is from here that coordination with each of the Distribution Centers is maintained. Mr. Van Breda has the following duties as the Corporate RSO:

- Assure that licenses for the distribution centers are current (Expiration dates and RSO's named on the licenses)
- Assure that proper training is provided for personnel at the distribution centers.
- Assure that records are kept of all radioactive materials brought onto the distribution center sites.
- Assure that proper security is maintained at all sites
- Assure that any changes in regulation are made known to the distribution centers
- Assist with response to regulatory inspections of the distribution centers.

As we discussed on the phone, Mr. Van Breda doesn't have a radiation safety background, but is charged with making sure that personnel at the distribution centers have proper training. However, OSRAM Sylvania has contracted with Sue Engelhardt, President of Engelhardt & Associates, Inc. to provide assistance at the Corporate level as well as for the distribution centers.

ENGELHARDT & ASSOCIATES, INC.
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Also, as we discussed on the phone, it appeared that some of the distribution centers were not up to date on their licenses. With that said, I am providing you with an update on the status of the distribution centers. The following centers have had license changes or are in process of amending licenses.

- **1651 South Archibald Ave., Ontario CA:** The RSO is being update to name Anthony Addimondo as the RSO. This paperwork was submitted to the State of California. I visited this site on 1 October, 2014 to provide training to Mr. Addimondo, as required by the State of CA; the State was processing the request at that time. The State is allowing the license to continue while this is underway; the inspector recognized it as an oversight and the center is working with the State to add Mr. Addimondo as the RSO.
- **2460 Broadhead Road, Bethehem, PA:** The RSO for this site has been changed to David Davies. A copy of this amendment change is attached for your reference.
- **655 South Willow St, Manchester, NH:** This center has closed as a distribution center. I have attached a copy of the letter from New Hampshire indicating this.
- **Royal Industrial Park, Bldg C, Road No. 869, Barrio Palmas, Catano, Puerto Rico:** This license is being terminated. There have been no lamps on site for several months. Mr. Scott Wilson, Region I, NRC is just wrapping up this termination.

The other licenses are current.

The role of Engelhardt & Associates, Inc. is to provide expert radiation safety consultation for OSRAM Sylvania across the board. The use of a contractor as the company RSO was not deemed the best fit for the well-being of company operations.

I hope this clarifies our license request. Thank you for taking the time to speak with me on this matter. Do not hesitate to contact me if you have further questions or concerns.

Sincerely,

Sue Engelhardt
President, CEO

Cc Peter Van Breda
Christopher LoRusso

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