

December 7, 2015
EN 15-030

OFFICE OF ENFORCEMENT
NOTIFICATION OF SIGNIFICANT ENFORCEMENT ACTION

Licensee: CampCo, Inc. EA-14-080
 Smith & Wesson Watch Division Docket No. 030-36619
 Los Angeles, California 90016

Subject: NOTICE OF VIOLATION AND PROPOSED IMPOSITION OF CIVIL
 PENALTY-\$28,000

This is to inform the Commission that a Notice of Violation and Proposed Imposition of a Civil Penalty (Notice) in the amount of \$28,000 will be issued on or about December 10, 2015, to CampCo, Inc. (CampCo). This action is based on four violations:

1. Distributing watches containing tritium to unlicensed persons without first obtaining either a) an amendment to the existing CampCo license, or b) a separate exempt distribution license for these watches, prior to transferring the watches containing byproduct material;
2. Failure to submit timely required annual reports to NRC, as required by Title 10 of the *Code of Federal Regulations* 32.16(c)(1);
3. Failure to provide required information in the annual reports, when the reports were provided upon NRC request; and
4. Failure to provide certificates, required by the CampCo license, with each lot distributed.

In accordance with the Enforcement Policy each of the four violations are categorized as Severity Level (SL) III violations.

On August 31, 2015, a pre-decisional enforcement conference was held with the licensee to discuss the apparent violation, its significance, the root causes, and the corrective actions.

CampCo has not previously been the subject of escalated enforcement action, however, Violations 1 and 2 (listed above) were identified as willful. Consequently, the NRC considered whether credit was warranted for Identification in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy. Based on the fact that neither violation was identified by CampCo, the NRC has determined that Identification credit is not warranted for Violations 1 and 2.

For all four violations, the NRC considered whether credit was warranted for Corrective Action in accordance with the civil penalty assessment process in Section 2.3.4 of the Enforcement Policy. CampCo's corrective actions included submitting an application and receiving NRC license approval for exempt-distribution of the tritium-source watches and submitting annual reports identified by NRC. Based on its assessment of CampCo's corrective actions, the NRC

determined that corrective action credit in accordance with the NRC Enforcement Policy is warranted for Violations 1 and 2; however, for Violations 3 and 4, corrective actions need to be further addressed and credit is not warranted. The Notice will require a written response from CampCo to specify the corrective actions addressing Violations 3 and 4.

Therefore, in accordance with the Enforcement Policy, the staff is proposing imposition of a total civil penalty in the amount of \$28,000 for the four SL III violations.

The Notice will be accompanied by the offer for CampCo to engage in the NRC Alternate Dispute Resolution Program.

As of this date, CampCo has not been specifically informed of the enforcement action. The schedule of issuance and notification to CampCo is on or about the following dates:

Mailing of Notice	December 10, 2015
Telephone Notification of Licensee	December 10, 2015

The State of California will be notified on or about the same date.

CONTACT: Susanne Woods, OE, 301-415-2740

Distribution: EN-15-030, December 7, 2015

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