



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

April 20, 2017

CampCo, Inc.
Smith & Wesson Watch Division
ATTN: Motti Slodowitz, President
4625 West Jefferson Blvd.
Los Angeles, CA 90016

SUBJECT: RESPONSE TO CAMPCO LETTER DATED FEBRUARY 13 AND 16, 2017,
ADDRESSING REQUIREMENTS OF THE U.S. NUCLEAR REGULATORY
COMMISSION CONFIRMATORY ORDER EA-14-080

Dear Mr. Slodowitz:

This is in response to your letters on behalf of CampCo to the U.S. Nuclear Regulatory Commission (NRC) dated February 13 and 16, 2017, and received by our office on February 22, 2017, regarding actions taken in accordance with Confirmatory Order EA-14-080.

In your letter dated February 13, 2017, you stated that, "We propose as a way to provide evidence that this training requirement has been satisfied, that IRSC place the required content in their online training system, and CampCo individuals take the training and pass the quiz, after which they will receive a certificate of attendance. The content will cover all the applicable NRC regulations for exempt distribution licenses; the specific requirements and obligations associated with the CampCo license; and all applicable CampCo procedures."

As stated in the Confirmatory Order, "Within 9 months, CampCo will submit a draft of the training content to NRC for review and approval." Without knowing what the "required content" is, the NRC cannot evaluate whether the training content meets the requirement. The NRC does not review information contained in a Web site for training content. Please submit the complete training content in written format for approval.

In your letter dated February 16, 2017, you provided three draft articles that will be submitted to social media, manufacturers, and watch industry publications as required by items 1, 2, and 3 of the Confirmatory Order. We have reviewed the draft articles.

Regarding the draft social media article to consumers of tritium watches, this article does not contain an adequate statement to address "awareness of a potential consumer safety hazard from non-compliant watches" as required in the Order. Your article needs to inform the consumers of the importance of obtaining tritium watches only from authorized dealers, and use of non-compliant watches could pose safety hazards. If not manufactured correctly, non-compliant watches could result in unintended radiation doses to users and the public, as well as potential radiological contamination. In addition, you stated you would post the article on CampCo Facebook and Twitter accounts. Explain how you plan to post the article on your Twitter account since Twitter limits Tweet length to 140 characters.

Regarding the article to watch manufacturers, this article accurately listed the violations issued to CampCo on July 7, 2015; however, your additional statements in your letter regarding the violations are not accurate. Delete the wording, "CampCo had previously sent NRC notification, but it was not processed due to CampCo unfamiliarity with the licensing protocols at the NRC and who the correct contact persons were." It is inaccurate to characterize the violation as a failure to inform NRC, rather it is accurate to characterize the violation as a failure to obtain NRC approval prior to distributing any watches containing the new source.

Additionally, we suggest deletion of the words "through accident conditions" in all three articles. Normal conditions for use of unauthorized watches containing radioactive material can also result in radiation dose, and not only through accident conditions.

Please revise the articles to address the above issues, and resubmit the articles for NRC review in accordance with items 1 through 3 in Section V of the Confirmatory Order. We also recommend that you evaluate your license, the Confirmatory Order issued to you, as well as, the independent third party consultant assessment required by item 9 of the Confirmatory Order to inform your revisions to the articles. You are requested to provide NRC with your revised articles within 15 days of the date of this letter.

Please note that the Order requires that all documents required to be submitted to the NRC are to be sent to:

Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

With copies to:

Director of Material Safety, State, Tribal, and Rulemaking Programs
Office of Nuclear Material Safety and Safeguards
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

Branch Chief, Materials Safety Licensing Branch
U.S. NRC/MSTR/NMSS
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

M. Slodowitz

-3-

In accordance with Title 10 of the *Code of Federal Regulations* 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. If you have any question concerning the content of this letter please contact Hipolito Gonzalez at (301) 415-5637 or e-mail at Hipolito.Gonzalez@nrc.gov

Sincerely,

/RA Joseph Nick for/

Daniel S. Collins, Director
Division of Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

Docket: 030-36619
License: No. 04-23910-01E

M. Slodowitz

-3-

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COMMISSION CONFIRMATORY ORDER EA-14-080 (APRIL 20, 2017)

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