

June 9, 2017

U.S. Nuclear Regulatory Commission
Office of Enforcement
Ms. Patricia K. Holahan
Washington, DC 20555-0001

Dear Ms. Holahan,

Airgas USA LLC ("Airgas"), a subsidiary of Airgas Inc., is submitting this voluntary self-disclosure with supporting documentation that describes suspected violations of the Foreign Trade Regulations ("FTR"). Although no violations of the U.S. Nuclear Regulatory Commission regulations occurred, it was recommended by the US Census Bureau on May 15, 2017 that a voluntary self-disclosure be filed with your office. The following information is provided in accordance with Section 30.74 (c) of the FTR and was submitted to the Chief International Trade Management Division of the US Census Bureau on March 22, 2017.

Airgas has granted Shipping International ("SI") Power-of-Attorney ("POA") and acts as an authorized agent of Airgas USA, LLC, ("Airgas") and files Electronic Export Information (EEI) on its behalf. In early 2017 after an internal review of the 2015 and 2016 US Census export trade data, it was determined that there may have been filings done with the incorrect export license code for certain Deuterium shipments (Harmonized Tariff Schedule code 2845.90.0000) during this period. These shipments were prepared and within the limits authorized in accordance with the Nuclear Regulatory Commission (NRC) regulations 10 CFR 110.24(a).

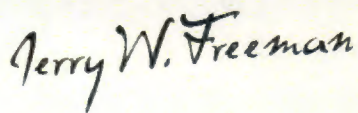
On February 20, 2017 Airgas informed SI that we would like to review the 2015 and 2016 filings made on Deuterium shipments. Subsequently, without our knowledge, SI amended two shipments (ITN: X20161017208996 and X20161024603553) with the correct export license code on February 20, 2017. On February 24, 2017 Airgas met with SI representatives to review our findings and to get clarification on the filings that were performed during this period. At this time we were informed by SI that the incorrect export license code may have been used on certain shipments going back to 2012. SI was entering export license code C33 - NLR instead of N02 - NRC General License, the correct export license code for these shipments. Airgas requested all supporting documents from SI since 2012 so we could review all filings since 2012. On March 8th, 2017 Airgas determined that 31 incorrect filings were made during this time period as outlined in Exhibit A on page 3.

We were told by SI that since 2012 these shipments were being filed through their computer software which then transmits to AESDirect Legacy at the time and what is now ACE (Automated Commercial Environment) system; therefore they were unaware that this was an actual error in their software. Furthermore, SI informed us that they knew the requirement to include the export license code so they included a statement on our Bill of Lading indicating the legal citation to the applicable NRC general license. We have been informed by SI that the software issue has been fixed and we requested SI amend the 31 shipments found in Exhibit A with the incorrect export license code on March 22, 2017.

As for corrective action by SI, Airgas has been informed that they have implemented additional policies including ISO 9001 procedures on all shipments for both import and export to help avoid any more software issues within its company and has assured us that this will not happen again. In addition SI indicated that they would start rechecking all filings manually through the ACE system to make sure that the correct information is being entered and accepted on each shipment.

If the Nuclear Regulatory Commission has questions regarding the information provided or should require additional information to complete this Voluntary Self Disclosure, please do not hesitate to contact me directly at 713.896.9284 or jerry.freeman@airgas.com.

Respectfully,



Jerry W. Freeman
Director of International Trade Compliance & Dangerous Goods Transportation

EXHIBIT A

NRC GENERAL LICENSE - N02	ITN#	DATE OF FILING
2012		
110.24A	X20120621047516	6/21/2012
110.24A	X20120905046168	9/5/2012
110.24A	X20120919057765	9/19/2012
110.24A	X20120920020880	9/20/2012
110.24A	X20121120065024	11/20/2012
110.24A	X20121120067514	11/20/2012
110.24A	X20121210018843	12/10/2012
110.24A	X20121231013300	12/31/2012
2013		
110.24A	X20130109037252	1/18/2013
110.24A	X20130301050020	3/1/2013
110.24A	X20130402045609	4/2/2013
110.24A	X20130404024592	4/4/2013
110.24A	X20130410020455	4/10/2013
110.24A	X20130830041087	8/30/2013
110.24A	X20130830058825	8/30/2013
2014		
110.24A	X20140207016435	2/7/2014
110.24A	X20140625071613	6/25/2014
110.24A	X20140821157425	8/21/2014
110.24A	X20141020341032	10/20/2014
2015		
110.24A	X20150129598716	2/11/2015
110.24A	x20150220778812	3/9/2015
110.24A	x20150326647039	4/12/2015
110.24A	X20150505761292	5/5/2015
110.24A	X20150716629148	7/16/2015
110.24A	X20151216592015	12/16/2015
2016		
110.24A	X20160223877887	2/23/2016
110.24A	X20160404994412	4/11/2016
110.24A	X20160411356748	4/11/2016
110.24A	X20160727953628	7/27/2016
110.24A	X20160817062921	8/17/2016
110.24A	X20160822298656	8/22/2016