



CAMP CO
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July 25, 2017

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

RE: Reply to Letter Dated July 10, 2017

Dear Dr. Holahan,

Below is our response to your letter dated July 10, 2017 regarding actions taken by Campco in accordance with Confirmatory Order EA-14-080.

With respect to the training program, the training content is still being revised to address the issues identified by the NRC. Campco intends to resubmit the training content within 14 days.

Regarding the draft article to industry publications for our tritium watches. Campco has pre-existing relationship with Surplus Today, making the publication more likely to publish our article. Watch Time and Watch Journal are publications that publish at their discretion. Surplus Today readership also more closely reflects our customers than the magazines you cited. Nevertheless, Campco will submit the article for publication to all three outlets.

The manufacturers article has been revised below to specifically address items 1, 2, and 3 of the order. We have also included a summary of the Notice of Violation and proposed civil penalty Campco received from the NRC.

Confirmatory Order Item #1-3

1. The President of CampCo will submit an article via social media outlets (e.g., Facebook, Twitter) to consumers of tritium watches.

b. The article will summarize the existence of NRC and Agreement State requirements for watches containing tritium, emphasize the importance of compliance with NRC and Agreement State requirements, and raise awareness of a potential consumer safety hazard for non-compliant watches.

2. The President of CampCo will send written notification to watch manufacturers and assemblers in China, and other international locations as identified by CampCo.

b. The notification will summarize the violations issued to CampCo, the existence of NRC requirements for watches containing tritium, the existence of an Agreement State program, and the importance of compliance with NRC and Agreement State requirements.

3. The President of CampCo will submit an article for industry publication.

b. The article will summarize the existence of NRC and Agreement State requirements for watches containing tritium and emphasize the importance of compliance with NRC and Agreement State requirements.

Dear Friends:

The manufacture and distribution of tritium watches for sale in the United States is regulated by the U.S. Nuclear Regulatory Commission. Tritium watches are exempt from regulation once they are initially distributed, so retailers and consumers do not need a license to own them; however, the initial distribution must be made under an NRC license to ensure that the devices meet safety requirements. In particular, non-compliant watches may present a potential consumer safety hazard. As a result, foreign made watches must first be imported through a licensed US facility before they can be distributed to retailers and consumers in the US (no drop shipping). Persons found in possession of tritium watches that have not been distributed by an NRC exempt distribution license holder are subject to enforcement action by NRC and State regulatory authorities.

Both the manufacturer and distributor of the watches, whether foreign or domestic, are required to have a written Quality Assurance Program (QA). The QA program of the manufacturer is required to meet NRC guidelines, which are similar to the ISO 9001 Certification Program (though ISO 9001 registration is not a specific requirement). Watches should also be manufactured according to industry standards. Failure to do so may result in watches being barred from import into the U.S.

In addition, the initial importer of the tritium watches must obtain a license for possession of the watches from either NRC or from their State, if the State has assumed regulatory responsibility over tritium watches from the NRC (see <https://scp.nrc.gov/> for more information on the NRC-Agreement State program). The possession license dictates how the radiation safety program will be run for storage, handling, and distribution of the watches.

It is vitally important that manufacturers, importers, and distributors comply with NRC and Agreement State requirements in order to ensure protection of the public health and safety. NRC is authorized to enforce its tritium watch regulations by imposition of monetary penalties, referral to a Federal District Court (injunction, seizure of products), or referral to the Department of Justice for criminal prosecution. NRC has, in the past, taken significant enforcement action against watch distributors for violations of NRC requirements involving the possession, use, and distribution of watches containing tritium, without having NRC licenses authorizing such activities. CampCo can attest to importance of following NRC and Agreement State requirements in this regard.

CampCo maintains an exempt distribution license from the US NRC and a possession license from the California Department of Public Health, Radiological Health Branch. Following an inspection.

July 27, 2015 the NRC issued a letter to CampCo detailing four apparent violations:

1. Initial distribution of watches containing tritium without appropriate authorization through an exempt distribution license.
2. Failure to timely submit required annual reports to the NRC on the types and quantities of byproduct materials transferred.
3. Failure to provide required information in the annual reports.
4. Failure to provide certificates, as required by the CampCo license, with each lot of watches distributed by CampCo.

The NRC subsequently issued a Notice of Violation (NOV) and proposed \$28,000 civil penalty to CampCo. CampCo did not dispute the specific technical violations identified by the NRC and agreed to undertake comprehensive corrective actions. CampCo also committed to taking actions to ensure that manufacturers of watches containing tritium are aware of their responsibilities, as well as the responsibilities of person that import watches containing tritium into the US. I hope that this letter serves as a useful reminder of the regulatory requirements applicable to watches containing tritium, the importance of compliance with NRC and Agreement State requirements, and the potentially severe consequences of non-compliance.

If you have any questions please call me at 323.766.2555 or email me at motti@campco.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Motti Slodowitz', with a small '70-1' written above the first part of the signature.

Motti Slodowitz
President

cc: Director of Material Safety, State, Tribal, and Rulemaking Programs
Branch Chief Materials Safety Licensing Branch