



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
2100 RENAISSANCE BOULEVARD, SUITE 100
KING OF PRUSSIA, PA 19406-2713

August 4, 2017

EA-13-190

Jay Gupta, Director
Plus, LLC
733 Summer Street, Suite 506
Stamford, CT 06901

SUBJECT: PLUS, LLC - NRC INSPECTION REPORT NO. 03038874/2017001 AND
NOTICE OF VIOLATION

Dear Mr. Gupta:

This letter refers to the inspection conducted on January 23, 2017, at your Stamford, Connecticut facility, with continued in office review through May 25, 2017. The purpose of the inspection was limited to a review of your corrective actions implemented in response to an NRC Order issued to you on August 8, 2016 [ADAMS ML16215A471].

This inspection also examined activities conducted under your license as they relate to public health and safety, and to confirm compliance with the Commission's rules and regulations and with the conditions of your license. Within these areas, the inspection consisted of selected examination of procedures and representative records, observations of activities, and interviews with personnel.

Based on the results of this inspection, the NRC has determined that one Severity Level IV violation of NRC requirements occurred. The violation was evaluated in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at (<http://www.nrc.gov/about-nrc/regulatory/enforcement/enforce-pol.html>). The violation is cited in the enclosed Notice of Violation (Notice) because the violation was identified by the NRC.

We understand that the reason for the violation was a lack of appropriate communications between Plus, LLC and the supplier regarding the specific series of watches being imported and distributed. Plus, LLC changed their ordering methods to ensure model numbers are incorporated into the process to ensure they will distribute only authorized models. Plus, LLC requested a license amendment on November 15, 2016, for the new license models. The license was amended on January 10, 2017.

The NRC has concluded that information regarding: (1) the reason for the violation; (2) the corrective actions that have been taken and the results achieved; and (3) the date when full compliance was achieved is already adequately addressed in the docket file. Therefore, you are not required to respond to this letter unless the description herein does not accurately reflect your corrective actions or your position. In that case, or if you choose to provide additional information, you should follow the instructions specified in the enclosed Notice.

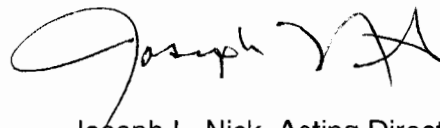
Current NRC regulations and guidance are included on the NRC's Web Site at www.nrc.gov; select **Nuclear Materials; Med, Ind, & Academic Uses**; then **Regulations, Guidance and Communications**. The current Enforcement Policy is included on the NRC's Web Site at

www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

If you have any questions regarding this matter, please contact Dennis Lawyer of my staff at 610-337-5366 or via electronic mail at dennis.lawyer@nrc.gov.

Thank you for your cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph L. Nick". The signature is fluid and cursive, with a large initial "J" and a stylized "N".

Joseph L. Nick, Acting Director
Division of Nuclear Materials Safety
Region I

Docket No. 03038874
License No. 06-35274-01E

Enclosure:
Notice of Violation

cc w/Encl: State of Connecticut

www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free at 1-866-512-1800. The GPO is open from 8:00 a.m. to 5:30 p.m. EST, Monday through Friday (except Federal holidays).

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Joseph L. Nick, Acting Director
Division of Nuclear Materials Safety
Region I

Docket No. 03038874
License No. 06-35274-01E

Enclosure:
Notice of Violation

cc w/Encl: State of Connecticut

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Joseph L. Nick, Acting Director
Division of Nuclear Materials Safety
Region I

Docket No. 03038874
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If you have any questions regarding this matter, please contact Dennis Lawyer of my staff at 610-337-5366 or via electronic mail at dennis.lawyer@nrc.gov.

Thank you for your cooperation.

Sincerely,

Blake D. Welling, Chief
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety
Region I

Docket No. 03038874
License No. 06-35274-01E

Enclosure:
Notice of Violation

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OFFICE	RI:DNMS	N	RI:DNMS	N			
NAME	DLawyer/drl		B.Welling				
DATE	06/12/17						

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J. Gupta

Communications. The current Enforcement Policy is included on the NRC's Web Site at www.nrc.gov; select **About NRC, Organizations & Functions; Office of Enforcement; Enforcement documents**; then **Enforcement Policy (Under 'Related Information')**. You may also obtain these documents by contacting the Government Printing Office (GPO) toll-free

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Blake D. Welling, Chief
Commercial, Industrial, R&D
and Academic Branch
Division of Nuclear Materials Safety
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Docket No. 03038874
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OFFICE	RI:DNMS	N	RI:DNMS	N			
NAME	DLawyer		B.Welling				
DATE	6/12/17						

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NOTICE OF VIOLATION

Plus, LLC
Stamford, CT

Docket No. 03038874
License No. 06-35274-01E

During an NRC inspection conducted on January 23, 2017, and in office review through May 25, 2017, a violation of NRC requirements was identified. In accordance with the NRC Enforcement Policy, the violation is listed below:

License Condition 9 of byproduct material license 06-35274-01E authorizes, in part, the distribution of Luminox timepiece models from model series 0200, 4200, 6250, 6400, 7050, 8820, 3080, 3050, 3000, 1940, 1920, 1800, as specified in the license application dated September 21, 2015, to persons who are exempt from the requirements for a license under 10 CFR 30.15, or equivalent regulations of any Agreement State.

Contrary to the above, Plus, LLC distributed Luminox timepiece models that were not from model series 0200, 4200, 6250, 6400, 7050, 8820, 3080, 3050, 3000, 1940, 1920, 1800, to persons who are exempt from the requirements for a license under 10 CFR 30.15, or equivalent regulations of any Agreement State. Specifically, between August 1 and September 30, 2016, Plus, LLC distributed three model 3955SET timepieces from model series 3950, four model 3151 timepieces from model series 3150, and two model 3152 timepieces from model series 3150. Models 3955SET, 3151, and 3152 are not listed in the license application dated September 21, 2015.

This is a Severity Level IV violation (Enforcement Policy Section 6.3).

The NRC has concluded that information regarding the reason for the violation, the corrective actions taken and planned to correct the violation and prevent recurrence, and the date when full compliance was achieved, is already adequately addressed in the docket file. However, you are required to submit a written statement or explanation pursuant to 10 CFR 2.201 if the description therein does not accurately reflect your corrective actions or your position. In that case, or if you choose to respond, clearly mark your response as a "Reply to a Notice of Violation" and send it to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, DC 20555-0001 with a copy to the Regional Administrator, Region 1 within 30 days of the date of the letter transmitting this Notice of Violation (Notice).

If you choose to respond, your response will be made available electronically for public inspection in the NRC Public Document Room or in the NRC's Agencywide Documents Access and Management System (ADAMS), accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>. Therefore, to the extent possible, the response should not include any personal privacy, proprietary, or safeguards information so that it can be made available to the Public without redaction.

In accordance with 10 CFR 19.11, you may be required to post this Notice within two working days of receipt.

Dated this 4th day of August 2017