

matson/Dave

Leadership Keys, Inc.

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October 22, 1982

Mr. D.J. Sreniawski, Chief
Materials Radiation Protection Section ?
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn
IL 60137

Re: Your letter of September 23, 1982 and Notice of Violation Appendix
License No. 21-19874-01

Dear Sir:

Explanation

We misunderstood the meaning of the quarterly reporting period. We began the quarter from the date of the issuance of the license which was January 25, 1982.

Corrective Action

We are now making quarterly reports according to the required calendar quarters. We are now in full compliance with regard to this reporting. Since we are now aware of this requirement, we shall avoid further noncompliance for quarterly reports to the US Nuclear Regulatory Commission.

Request for time extension

With regard to reports to responsible Agreement States, we request an extension of response time by 90 days.

We have already obtained a list from the Material Licensing Branch in Washington of all of the agreement state contact persons. We have made telephone contacts with some of these. With the first two we contacted, persons had changed their responsibilities, and we made about 5 long distance telephone calls to each of these two state offices. It was not possible for us to continue this method of obtaining the specific regulations of each agreement state.

We have filed on June 28, 1982 before the Commission a brief AMICUS CURIAE in support of licensing for exempt distribution of tritium-illuminated gunsights in the matter of Self-Powered Lighting, Ltd., docket No. 30-9842. In this matter the US NRC staff has now, on August 6, 1982, renewed the subject exempt license. We are hoping that the Commission will make a decision on this proceeding very soon.

In the event the Commission ruling would permit us to distribute to exempt persons, we would apply for an amendment to our license, and would be relieved of the requirement for reporting to agreement states.

For these reasons we ask for an extension of 90 days, until January 21, 1983 to prepare a response on how we will achieve compliance with regard to reports to agreement states.

Yours truly,

A handwritten signature in cursive script, appearing to read "Glyn A.J. Bindon". The signature is written in dark ink and is positioned above a horizontal line.

Glyn A.J. Bindon
President