

EXHIBIT 31

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P.T. NIGHT SIGHT

July 5, 1995

Virginia J. Van Cleave  
Investigator  
U.S. Nuclear Regulatory Commission  
Office of Investigations  
611 Ryan Plaza Drive, Suite 1000  
Arlington, TX 76011

RE Innovative Weaponry Inc  
License #30-23697-01E

Dear Ms. Van Cleave:

In response to your inquiries of last week, I have spoken with Dave Gregor and tried to put together the whole scenario for you.

During the shot show in January, SRB Technologies, Inc. notified us that they had applied for an NRC license and that they were going into competition with us in the U.S. Because of this competition factor, we felt that we must pursue another supplier of tritium.

During that same shot show, we were introduced to Marc Ager who represented Ramrod Manufacturing (Pty) Ltd. Mr. Ager told us that he had a relationship with Lumitech in South Africa who manufactured tritium filled glass tubes and that he could get information for us in regards to our need for tritium. Mr. Ager witnessed the meeting with Mr. Pullen.

About a month or so passed and we decided to get the information that Mr. Ager said that he could provide. This information included tritium information from Lumitech. Marc Ager invited Dave Gregor to come to South Africa and Dave did so.

I have discussed the rumor that you conveyed to me regarding a contract with South Africa. Dave told me that there was no written contract, only a verbal agreement. You will need to speak with Dave regarding this verbal agreement when you get back from your trip. I am sorry for the delay in getting this letter to you, but I wanted to make sure that I had my facts correct before I relayed them to you. If you need any information regarding Lumitech, it will be a part of the new application for license that Susan Greene will have by Monday of next week.

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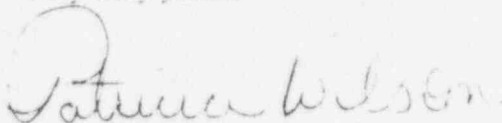
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I will be gone on vacation from July 8 thru July 15 and back to work on July 17th. You can reach me then or call Dave Gregor.

Very truly yours,

A handwritten signature in cursive script that reads "Patricia Wilson". The signature is written in dark ink and is positioned above the printed name and title.

Patricia Wilson  
Exec Vice President

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**P.T. NIGHT SIGHT**

July 7, 1995

Ms. Susan Greene  
U.S. Nuclear Regulatory Commission  
Washington D.C. 20555-0001

RE: Mail Control 021537

Dear Ms. Greene,

In an attempt to clarify our licensing procedures with the NRC, this letter supersedes all prior communications from I.W.I. to the NRC. Hopefully this additional information will enable the NRC to complete the license renewal process in a positive and timely manner. Each point in your June 21, 1995 letter is addressed along with all other corresponding documents required for assistance regarding your evaluation. We will continue to strive in the submission of all information in order to achieve and maintain total compliance with NRC policy and regulations.

1. Enclosed find the drawings which contain the overall dimensions, the minimum and maximum dimensions for each series type and the source mounting configurations used for each series type. The minimum wall thickness for source installation in steel shall be .010" while the maximum dimensional tolerance is .0625". In answer to your question regarding alternative sight materials, at present we do not install tritium into existing sights that are polymer in construction. With the advent of space-age plastics utilized by many firearms manufacturers, an application may forthcoming in the near future to allow us to perform installations into these "plastics". The identical .010" minimum and .0625" maximum tolerances would be utilized.
2. The bar/white outline configuration is basically one horizontal bar, as authorized by Model RBI010, with white paint surrounding the rear notch or aperture. Several weapon manufacturers offer a white outline which enhances daytime shooting. To meet the demands of the consumer and offer a sighting system compatible with the manufacturers, we request authorization to paint the notch or aperture after the horizontal bar installation. This particular installation in no way detracts from the inherent safety requirements of the already approved Model RBI010 installation. We are also including drawings for a series of new mounting configurations. I understand a device review by the Sealed Source and Safety Section is required in order to accomplish the authorization process. I have included the prototype testing procedures on the new configurations for your review. Each luminous gun sight shall

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not contain more than 90 millicuries per source. Individual weapons shall not contain more than 120 millicuries total enabling us to perform triple bar and box dot installations. The new series designations are as follows:

SERIES 100 - 1 dot (front sight)

SERIES 200 - 2 dot

SERIES 300 - bar

SERIES 400 - bar with white outline paint

SERIES 500 - double bar

SERIES 600 - double bar with white outline paint

SERIES 700 - triple bar

SERIES 800 - box

SERIES 900 - 2 dot with bar

3. In order to obtain a broader classification series, we have reclassified the series by tritium arrangement and configuration only. This classification information supersedes all prior documents submitted by IWI. Refer to drawings and information as submitted in paragraph 2.
4. Some manufacturers (such as Smith and Wesson and Beretta) utilize integral front sights in their design and manufacturing process, therefore a SERIES 100 style front sight would be installed therefore, we would like to continue this as part of our license.
5. A. Sights are machined to blueprint specifications via computer numerically controlled equipment. This sophisticated method of production assures us that parts are machined to print, otherwise the part(s) are rejected by Quality Control. The minimum wall thickness of .010" along with the hole depth is verifiable by dial calipers and plug gauges upon completion. Twenty five per cent of the product is inspected for deficiencies before the source installation process begins. If during source installation a source does not meet our criteria for installation, it is rejected. For example, a hole drilled to the improper depth could possibly pass by our twenty five per-cent inspection criteria. This deficiency would become apparent during the source installation process because the source would not fit flush with or slightly below the top of the sight. One hundred percent of sealed sources are inspected for proper sealant and lensing material to ensure the level of the lensing material is flush with or slightly below the face of the sight. The lens area is optically inspected for bubbles, discoloration, fatigue, or any other visual abnormality. Quality Control and source installation personnel carefully inspect all sights prior to shipment.

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- 5.B As specified in paragraph 5A, twenty five per-cent of the product is inspected for deficiencies before the source installation process begins. Dovetails are measured using a go/no-go gauge. Hole depth is verified by a plug gauge ground to exact hole diameter and depth. Wall thickness is measured using dial calipers to ensure the minimum .010" and the maximum .0625" measurements are maintained.
- 5.C Our pass/fail criteria is as follows: If the sight cannot be reworked (because the hole is too deep or a .010" minimum does not exist) the sights are scrapped. These sights do not have tritium in them because they have not yet reached that particular phase of production yet. If a sight were to be rejected because of faulty installation (i.e. tritium protruding), the sight would be chemically soaked in order to degrade the bond. The source would then be placed in a container and shipped back to the manufacturer along with those sources that do not meet our visual brightness requirements. (See paragraph 5E below)
- 5.D After initial inspection for dimensional requirements, all sights are stamped with the H3 - PT designation located as close to the source as feasible. The sights are then blued, de-greased and again inspected for proper labeling/stamping. Source installation is then performed and inspected for lensing, bonding, discoloration and checked once again for proper labeling. Prior to shipment, Quality Control again inspects all sights to insure that all established criteria was met. At this point several different production personnel have determined that each sight meets all requirements and criteria.
- 5.E From past experience, sources that were manufactured with minute fractures generally do not glow when the shipment is unpackaged upon arrival. These sources are immediately segregated into a separate container for shipment back to the manufacturer (see paragraph 5C above). All sources are cured for a 24 hour period to ensure proper bonding and illumination. All sights are visually inspected for illumination after source installation, through the quality control process and also again prior to shipment. If at any phase during production it is determined that a sight does not illuminate, it is returned to the manufacturer.
- 5.F The isotope and logo (H3-PT) will be stamped on each sight whenever possible. If this is not feasible, the logo and label will be stamped on the slide, sight blade or any area in close proximity to the source. Close proximity, in the worst case scenario, would be no more than .500" from the source. We utilize three different size stamps for compliance purposes. The size utilized for stamping is based on the surface area of the given sight. The larger the sight, the larger the stamp.



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6. Prototype testing for SERIES 400 sights through SERIES 900 sights was conducted using the following guidelines:
- \* Thermal testing was performed in order to subject the sights and their bonding agents to fluctuations in temperature. The lensing material (Impruv) and the bonding agent (Black Max) have temperature operating variances between -65 degrees Fahrenheit to 223 degrees Fahrenheit. Testing procedures along with chemical analysis supplied by manufacturer are enclosed for your review.
  - \* Drop testing was performed on the prototypes to discern adhesive integrity of the glued source insert. Prototypes were dropped from a height of five feet onto a solid concrete floor without failure. Testing procedures are enclosed for your review.
  - \* Recoil/shock testing, much like drop testing, was performed to ensure adhesive integrity. The testing procedures are enclosed for your review.
  - \* Chemical testing was performed on the prototypes to determine the effects, if any, on solutions designed for normal cleaning and maintenance of firearms. The testing procedures and data are enclosed for your review.

The above tests were conducted by IWI personnel under closely approximated laboratory procedures. We are satisfied that all the results are consistent with standard and accepted laboratory procedures; however, we are willing to engage independent testing authorities if that is preferable to you.

#### THERMAL TESTING PROCEDURE

PROTOTYPE	Series 400 thru 900 inclusive
OBJECTIVE	Subject prototypes to extreme temperature variations
PROCEDURE -	Place prototypes in oven for 10 minutes Place prototypes in deep freeze for 1 hour
CONCLUSION	See attached

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#### DROP TESTING PROCEDURE

PROTOTYPE - Series 400 thru 900 inclusive  
OBJECTIVE - Subject prototype to impact testing.  
PROCEDURE - Drop prototypes attached to weapons onto concrete from a distance of two to five feet  
CONCLUSION - See attached

#### RECOIL/SHOCK TESTING PROCEDURES

PROTOTYPE - Series 400 thru 900 inclusive  
OBJECTIVE - Subject prototypes to live fire tests  
PROCEDURE - Mount prototypes on weapons and shoot from 100-250 rounds per gun at range.  
CONCLUSION - See attached

#### CHEMICAL TESTING PROCEDURES

PROTOTYPE - Series 400 thru 900 inclusive  
OBJECTIVE - Subject prototypes to chemical solutions utilized in normal care and maintenance  
PROCEDURE - Submerge prototypes in the following solutions for 30 minutes - Break-Free, WD-40, Hoppes #9, Shooters Choice, Nyoil, Accubore, Gun Scrubber, Rem Oil and Tri-Flow  
CONCLUSION - See attached

All testing was verified using a pass/fail classification to determine whether a bonding, illumination, chemical deterioration, fatigue or similar failures occurred during the testing procedures.

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All sights passed all tests

Because of logistical reasons IWI could be asked to install sights for law enforcement agencies at their facilities. We are aware of the proper documentation required to perform these mobile installations and therefore intend to comply with all necessary documentation for agreement and non-agreement states.

We are also in the process of changing our tritium supplier from SRB in Canada to Lumitech which is located in the Union of South Africa. In January of this year SRB informed us of their intention to enter the tritium sight business and therefore would become a direct competitor. Because of this conflict of interest we felt it advisable to utilize a different vendor so as to avoid possible supply problems and the accompanying interruption of business. Presently the relationship between IWI and Lumitech is governed by a verbal agreement. Following a suitable trial period we contemplate completing a written contract. Lumitech builds all their GTLS's to British mil spec which is internationally accepted. Because of this we expect to offer an even better product built to exacting tolerances with all the documentation required to substantiate the specifications. Lumitech operates openly as a business unit of the Atomic Energy Corporation of South Africa. Tritium operations take place in a facility licensed by the local Council for Nuclear Safety (CNS). Their site license, NL-27, now includes the document LCP/MS (251)13.2.1 Part C - PLANT OF LUMINESCENT LIGHT SOURCE PRODUCTION (LUMITECH). Lumitech is obligated to submit to the South African LICENSING AND SAFEGUARDS DEPARTMENT verified inventories of their uranium and tritium in stock which includes every curie of tritium that is bought or sold. Lumitech's LICENSING AND SAFEGUARDS activities are very closely monitored and scrutinized by the INTERNATIONAL ATOMIC ENERGY AGENCY (IAEA). Inspectors from the IAEA visit Lumitech at least once a year with the most current visit conducted as recent as June 1995. Lumitech was also visited by two NRC officials. Their names are Mr. John M. Roney, Director of the Office of Nonproliferation Technology and Mr. Angelo C. Giarratana, International Safeguards Analyst.

Our long term plans are to bring to market certain consumer safety items such as: exit signs, stairwell markers, light switches, tread plates for stairway illumination, armchair markers and floor markers. It is interesting to note that more people were injured in the World Trade Center bombing from falling down stairs than as a result of the actual explosion. This was due in part to the failure of the back up power source responsible for illuminating the exit and stairway locations. With the installation of tritium markers the need for a secondary power source would be virtually eliminated. We at IWI feel there is a substantial market for tritium markers in all areas of the workplace and that these would enhance the occupational safety and well being of each worker. Any guidance or assistance that you would be willing to offer in the incorporation of these and other consumer safety products into our licensing requirements would be greatly appreciated.

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Very truly yours,

*David M. Gregor*  
David M. Gregor  
President  
IWI Inc.

DMG:mcp

Enclosures

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