

TFLEPHON: E: (809) 773-0424 NO EXCENSIVE AND ADDRESS.

FAX: (809) 773-9207

P.O. BOX 949 - CHRISTIANSTED, ST. CROX UNITED STATES VIRGIN ISLANDS 00820 MANUFACTURERS OF FINE QUALITY QUARTZ ANALOG MOVEMENTS

September 1, 1988

U.S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555

SUBJECT: REPLY TO A NOTICE OF VIOLATION (NRC INSPECTION REPORT NO. 87-01)

Gentlemen:

This is in response to a letter and enclosed Notice of Violation from Mr. William E. Cline, Chief, Norlear Materials Safety and Safeguards Branch, Division of Radiation Safety and Safeguards, NRC Region II, Atlanta GA.

- (1) We admit the viciation, involving receipt of 2,040 sets of watch hands to which luminous paint containing tritium (H 3) had been applied by our licensed supplier.
- (2) Reason for violation: After 1981 we had discontinued asserbing watches with luminous hands, since demand for this type of watch had dropped to a point where it became uneconomical to compete. However, a special order was accepted last year and we did assemble 2,040 watch heads using luminous hands. Neither our Sales Department in New York nor the factory in St. Croix realized that this involved a quantity of tritium (H 3) which exceeded the exempt level of activity permitted. Of course we did meticulously observe the necessary safety precautions in handling the material. Compared to our total production of over 360,000 watches and watch movements during 1987, these 2,040 watch heads were only a very small fraction. We regret the oversight.
- (3) & (4) Corrective steps: Accordingly, we have since submitted a new application for a material license to NRC Region II, as well as an application for a Type E License with the NRC in Washington, D.C., which will put us in the position to accept new orders for watches using luminous/paintif the occasion arises.
- (5) Date when full compliance will be achieved: Hopefully, our applications for licenses will be granted without undue delay.

In closing, please accept our assurance that we will comply with all requirements in future, as we had in the past, and we respectfully request that the subject violation notice be cancelled.

8809090207 880901 NMSS LIC30 55-14872-02E

Sincerely,

cc: Regional Administrator MRC Region II

I. Grunwald

Vice President

BELAIR QUARTZ, INC.

THE CHARTE IS A WHOLLY OWNED SUBSIDIARY OF BELAIR TIME CORP., P.O. BOX 949 - CHRISTIANSTED, ST. CROIX, U.S. V.I. 00820 押はTED WITH: BELAIR WATCH CORPORATION, 10 E. 39 STREET, NEW YORK, N.Y. 10016 -- TELEPHONE: (212) 679-2960 -- TELEX: 421682.



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