



Q-5

April 22, 2004

Ms. Betsy Ulrich
Nuclear Materials Safety Branch
U.S. Nuclear Regulatory Commission – Region 1
475 Allendale Road
King of Prussia, PA 19406-1415

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RECEIVED
REGION 1

Reference: License #37-00030-08

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X

Dear Ms. Ulrich,

We hereby submit our application to renew our Nuclear Regulatory Commission License #37-00030-08. As granted with our previous renewal, we respectfully request a continued exemption from the decommissioning funding requirements of 10 CFR 30.35.

In consideration of this request, we submit the following:

1. Despite a very difficult business environment, we have thus far contributed an additional \$339,000 into our Decommissioning Escrow Fund. While this amount currently represents a deficiency of \$72,000, we are working diligently to make up this shortfall and have committed to include additional sums with our current monthly payments as we are able. Whatever balance remains at the end of our current license period will continue to be paid with additional escrow payments during our next license period until this deficiency is made up, bringing our total contribution attributable to our current license to \$492,000.
2. We have tackled the remediation of the underground silos which, as agreed by all parties, represented the greatest potential threat to public safety at our site. In this effort, to date we have spent more than \$1,600,000.

While we continue to work toward a solution for the long term disposition of some of the waste, the silos and their contents have been removed from the ground, the waste has been sorted and segregated to the fullest extent possible, one truckload of waste has been removed from the site, and the balance is properly stored in appropriate containers on site. The threat to the

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public posed by the potential migration of this waste from the underground silos has been eliminated.

3. As outlined in our letter of December 10, 2003 regarding Condition 18 of our License, at present we have 16,731 curies of tritium waste on site. This material remains on-site due to our joint decision to concentrate our limited financial resources on the completion of the silo remediation project.

Despite the fact that it is only our 08 licensed activities that generates any cash flow from which we contribute toward the Escrow Fund, to date all available funds have been expended on the 02 license clean-up. Although we are not certain that a disposal option exists for all of the waste generated by the 08 license, this could have been addressed and can certainly be addressed in the future if we decide to use our available funds here rather than divert them for use in the 02 license remediation and disposal activities.

4. We have continued the required environmental monitoring of the site, maintained the perimeter fencing and provided the appropriate security during these times of heightened national concern.
5. We have run all operational programs in full compliance with the requirements of our License.
6. At this time, there are more than 40 people employed at the site with an annual payroll approaching \$1,000,000 (including SLC and USR Metals). Without a renewal of our license, we would be forced to cease operations and lay-off all of our employees. This would cause an economic hardship on our employees, their families, and the community.

Additionally, our operations contribute more than \$2,000,000 annually in raw material purchases which obviously impact not only our local economy but also all of our vendors.

During the next License period we will continue to work toward a satisfactory long term solution for the remaining silo waste currently stored on site. Once this is completed, subject to the availability of funds, we will then undertake additional site remediation based upon our mutual agreement concerning what to do next.

We will keep the property secure while continuing our program of environmental monitoring.

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Additionally, while we recognize the need for continued funding of the escrow account, it is clear from our current situation that we were too aggressive with our commitment during the last license renewal. The economic downturn made it impossible for us to keep up with our obligation and caused us to fall behind by \$81,000. Although this shortfall has recently been reduced to \$72,000 as stated above, we recognize that we cannot commit to the same levels of funding as before and be confident in our ability to meet our obligation. We therefore propose to contribute \$5000 per month for the 60 month renewal period from January 2005 through December 2009. This will add an additional \$300,000 to the Escrow Fund.

Safety Light has a long history of achievement in the emergency lighting business. On behalf of our employees and the customers we serve, we respectfully request that you grant our renewal request.

We appreciate your consideration.

Regards,

A handwritten signature in black ink, appearing to read "William Lynch Jr." with a stylized flourish at the end.

William E. Lynch Jr.
Vice-President

This is to acknowledge the receipt of your letter/application dated

4/22/2004, and to inform you that the initial processing which includes an administrative review has been performed.

☒ RENEW 37-00030-08
There were no administrative omissions. Your application was assigned to a technical reviewer. Please note that the technical review may identify additional omissions or require additional information.

☐ Please provide to this office within 30 days of your receipt of this card

A copy of your action has been forwarded to our License Fee & Accounts Receivable Branch, who will contact you separately if there is a fee issue involved.

Your action has been assigned Mail Control Number 134921.
When calling to inquire about this action, please refer to this control number.
You may call us on (610) 337-5398, or 337-5260.

BETWEEN:

License Fee Management Branch, ARM
and
Regional Licensing Sections

: (FOR LFMS USE)
: INFORMATION FROM LTS
: -----
:
: Program Code: 03214
: Status Code: 2
: Fee Category: 3B
: Exp. Date: 20041231
: Fee Comments: ALWAYS
: Decom Fin Assur Req'd: N
:

LICENSE FEE TRANSMITTAL

A. REGION I

1. APPLICATION ATTACHED

Applicant/Licensee: SAFETY LIGHT CORP.
Received Date: 20040429
Docket No: 3005982
Control No.: 134921
License No.: 37-00030-08
Action Type: Renewal

2. FEE ATTACHED

Amount: /
Check No.: /

3. COMMENTS

Signed M. A. Perkins
Date 4/30/2004

B. LICENSE FEE MANAGEMENT BRANCH (Check when milestone 03 is entered /___/)

1. Fee Category and Amount: _____

2. Correct Fee Paid. Application may be processed for:

Amendment _____
Renewal _____
License _____

3. OTHER _____

Signed _____
Date _____