



Docket 03038187
License No. 20-23981-01E

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

SUBJECT: **REPLY TO A NOTICE OF VIOLATION**
DETECTED DURING NRC INSPECTION AT COSMEDICO LIGHT, INC.
NOTICE DATED FEBRUARY 11, 2016.

Dear Sir or Madam,

Cosmedico Light recently received a Notice of Violation pertaining to our License 20-23981-01E to distribute exempt quantities of Kr 85 in electron tubes (metal halide lamps). The violation specified that we had failed to submit to the NRC, in a timely manner, the required transfer reports for previous years as noted in the attached Notice of Violation document.

Our company President discussed this matter with Mr. Courtemanche of the regional office at an exit meeting phone call and I subsequently had an email exchange and a phone conversation with Mr. Courtemanche in which we came to, what we at Cosmedico believe is, an acceptable resolution.

First, the reason for the violation was one of simple human forgetfulness. An effective method of reminders of the due date for the reports was not implemented.

The following corrective actions have been put in place to prevent future failures:

Cosmedico Light, Inc. has set up an automatic REMINDER System with multiple back-ups:

- Automatic reminders have been installed in the Microsoft Outlook Calendar system that I, as RSO, use on a daily basis. The reminders are currently set for December 31, 2016, 2017 and 2018, with instructions to alert me to assemble and submit the subject report on or before January 13th of each year.
- An automatic reminder (with alarm) has been installed on our company web-based ERM network with specific directions to assemble and send the required report on or before the second Friday of January in each year.
- Our company President has placed the above mentioned reminders (with corresponding email alerts) in his MS Outlook calendar.

Cosmedico Light, Inc
233 Libbey Industrial Parkway
Weymouth, MA 02189

Rec'd 03/24/16

- Our company Sales Manager has placed the above mentioned reminders (with corresponding email alerts) in his MS Outlook calendar.
- I have installed reminders (with alarms) in my company iPhone calendar.

These corrective / preventive measures, with the multiple redundancies have been implemented as of this date (February 25, 2016).

I am confident that with the implementation of the above mentioned actions, there will not be any further delinquency in submitting the required annual transfer report prior to the January 31st deadline according to USNRC regulations.

Please contact me if there are any questions or if clarifications are necessary.

Thank you.

Respectfully submitted

A handwritten signature in black ink, appearing to read "Steven Schlitt". The signature is fluid and cursive, with the first name "Steven" and last name "Schlitt" clearly distinguishable.

Steven Schlitt
Radiation Safety Officer
Cosmedico Light, Inc.

Cc:

Kevin Apgar – President, Cosmedico Light, Inc
Christopher Cahill - Regional Administrator, Region 1, 2100 Renaissance Boulevard, Suite 100, King of Prussia, PA 19406-2713

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