



**UNITED STATES
NUCLEAR REGULATORY COMMISSION**
WASHINGTON, D.C. 20555-0001

January 23, 2017

CampCo, Inc.
Smith & Wesson Watch Division
ATTN: Motti Slodowitz, President
4625 West Jefferson Blvd.
Los Angeles, California 90016

**SUBJECT: RESPONSE TO CAMPCO LETTER DATED DECEMBER 20, 2016, ADDRESSING
REQUIREMENTS OF THE U.S. NUCLEAR REGULATORY COMMISSION
CONFIRMATORY ORDER EA-14-080**

Dear Mr. Slodowitz:

This is in response to your letter on behalf of CampCo to the U.S. Nuclear Regulatory Commission (NRC) dated December 20, 2016, and received by our office on January 9, 2017, regarding actions taken in accordance with Confirmatory Order EA-14-080.

In your letter, you provided three draft articles that will be submitted to Social Media, manufacturers, and watch industry publications as required by items 1, 2, and 3 of the Confirmatory Order, dated June 20, 2016. We reviewed the draft articles and determined that they do not adequately address items 1, 2, and 3 of the 2016 Confirmatory Order. For example, action #1A does not adequately address the NRC and Agreement State requirements for watches containing tritium, nor does it raise awareness of a potential consumer safety hazard for non-compliant watches. In your action #2A, the violations issued to CampCo were not summarized and the regulatory requirements for distributing watches containing tritium were not clearly addressed. In your action #3A, the regulatory requirements for distributing watches containing tritium were not clearly addressed and a list of proposed recipients was not provided. In addition, the articles contained multiple inaccurate references regarding regulatory requirements. One such example among multiple items is a statement referring to "very strict guidelines set out by the Agreement State requirements." This is incorrect because the regulatory requirement for distribution of watches containing tritium is set by the NRC, not Agreement States. The correct reference would be 10 CFR 32.14 "Certain items containing byproduct material; requirements for license to apply or initially transfer." The articles also contained incorrect statements addressing the NRC actions taken regarding CampCo. One such example among multiple items is a statement that "CampCo has been absolved in the following four areas of potential violation...". This is incorrect because the NRC has not absolved CampCo's violations. The correct reference would be the Confirmatory Order (EA-14-080) issued by the NRC regarding all corrective actions listed in the order.

Please revise the articles to address all of the above issues, and resubmit the articles for NRC review in accordance with items 1 through 3 in Section V of the Confirmatory Order. We also recommend that you evaluate your license, the Confirmatory Order issued to you, as well as, the independent third party consultant assessment required by Item 9 of the Confirmatory Order to help inform your revisions to the articles. You are requested to provide NRC with your revised articles within 15 days of the date of this letter.

Please note that all documents required to be submitted to the NRC should be sent to: Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One White Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738, with copies to the Director of Material Safety, State, Tribal, and Rulemaking Programs (MSTR), Office of Nuclear Material Safety and Safeguards (NMSS), Two White Flint North, 11545 Rockville Pike, Rockville, MD 20852-2738; and the Branch Chief of Materials Safety Licensing Branch, MSTR, NMSS, Two White Flint North, 11545 Rockville Pike, Rockville, MD 20852-2738.

In accordance with Title 10 of the *Code of Federal Regulations* 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be made available electronically for public inspection in the NRC Public Document Room or from the NRC's Agencywide Documents Access and Management System, accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html>.

Sincerely,

/RA/

Pamela J. Henderson, Deputy Director
Division of Material Safety, State, Tribal
and Rulemaking Programs
Office of Nuclear Material Safety
and Safeguards

Docket: 030-36619
License: No. 04-23910-01E

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Sincerely,

Pamela J. Henderson, Deputy Director
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