



**United States  
Nuclear Regulatory Commission**

# **Report of Investigation**

**INNOVATIVE WEAPONRY, INC.:**

**ALLEGED DELIBERATE VIOLATION OF LICENSE CONDITIONS**

**Office of Investigations**

Reported by OI: **RIV**

Information in this record was deleted  
in accordance with the Freedom of Information  
Act, exemptions **2G**

FOIA- **96-246**  
**9610240068 961016**  
**PDR FOIA**  
**TOURTEL96-246 PDR**

**B11**

Title: INNOVATIVE WEAPONRY, INC.:

ALLEGED DELIBERATE VIOLATION OF LICENSE CONDITIONS

Licensee:

Innovative Weaponry, Inc.  
337 Eubank NE  
Albuquerque, NM 87123

Docket No.: 03030266

Case No.: 4-95-022


Report Date: March 22, 1996

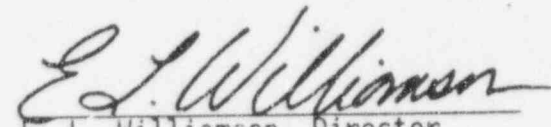
Control Office: OI:RIV

Status: CLOSED

Reported by:

Reviewed and Approved by:

  
Virginia Van Cleave, Sr. Investigator  
Office of Investigations  
Field Office, Region IV

  
E. L. Williamson, Director  
Office of Investigations  
Field Office, Region IV

Participating Personnel:  
Dennis Boal, NRC Investigator, RIV

WARNING

The attached document/report has not been reviewed pursuant to 10 CFR Section 2.790(a) exemptions nor has any exempt material been deleted. Do not disseminate or discuss its contents outside NRC.  
Treat as "OFFICIAL USE ONLY."

## SYNOPSIS

This investigation was initiated by the Nuclear Regulatory Commission (NRC), Office of Investigations (OI), Region IV (RIV), on May 9, 1995, to determine if Innovative Weaponry, Inc. (IWI), was deliberately violating its NRC license conditions by distributing unauthorized luminous gunsights containing tritium. The investigation was subsequently expanded to determine if IWI was deliberately violating its NRC license conditions by distributing gunsights containing tritium obtained from an unauthorized source.

Based on the evidence developed during this investigation, it is concluded that IWI deliberately violated the conditions of its NRC license by selling certain night sights unmounted and selling night sights containing tritium from an unauthorized source.

THIS PAGE LEFT BLANK INTENTIONALLY



## ACCOUNTABILITY

The following portions of this Report of Investigation (Case No. 4-95-022) will not be included in the material placed in the PDR. They consist of pages 3 through 43.

THIS PAGE LEFT BLANK INTENTIONALLY

# TABLE OF CONTENTS

	<u>Page</u>
SYNOPSIS.....	1
ACCOUNTABILITY.....	3
APPLICABLE REGULATIONS.....	7
LIST OF INTERVIEWEES.....	9
DETAILS OF INVESTIGATION.....	11
Purpose of Investigation.....	11
Background.....	11
Interview of Allegor.....	11
Documentation Review of Correspondence and Other Documents to/from the NRC and IWI.....	12
Documentation Review of Records of Night Sight Sales by IWI.....	14
Allegation 1 (Alleged Deliberate Violation of License Conditions by Selling Night Sight Configurations or Loose Night Sights not Authorized by the NRC License).....	20
Testimony.....	21
Conclusions.....	26
Allegation 2 (Alleged Deliberate Violation of License Conditions by Selling Gun Sights Containing Tritium from a Source Not Authorized by the NRC License).....	26
Testimony.....	26
Conclusions.....	34
Agent's Analysis.....	34
SUPPLEMENTAL INFORMATION.....	39
LIST OF EXHIBITS.....	41

THIS PAGE LEFT BLANK INTENTIONALLY

## APPLICABLE REGULATIONS

Allegation 1: Alleged Deliberate Violation of License Conditions by Selling Night Sight Configurations or Loose Night Sights Not Authorized by the NRC License

Allegation 2: Alleged Deliberate Violation of License Conditions by Selling Gunsights Containing Tritium from a Source Not Authorized by the NRC License

10 CFR 30.3: Activities Requiring License (1994 and 1995 Editions)

10 CFR 30.9: Completeness and Accuracy of Information (1994 and 1995 Editions)

10 CFR 30.10: Deliberate Misconduct (1994 and 1995 Editions)

10 CFR 30.19: Self-Luminous Products Containing Tritium, Krypton-85, or Promethium-147 (1994 and 1995 Editions)

10 CFR 30.34: Terms and Conditions of Licenses (1994 and 1995 Editions)

10 CFR 32.22: Self-Luminous Products containing Tritium, Krypton-85, or Promethium-147: Requirements for License to Manufacture, Process, Produce, or Initially Transfer (1994 and 1995 Editions)

NRC License #30-23697-01E

THIS PAGE LEFT BLANK INTENTIONALLY

# LIST OF INTERVIEWEES

	<u>Exhibit</u>
DODGEN, C. Thomas, Controller, MMC.....	49
FLOYD, William, Program Manager, New Mexico Environment Department, Radiation Licensing and Registration Section.....	57 & 58
GREGOR, David M., President, IWI.....	46
KREISMAN, Dale J., Owner, MMC.....	50
(REDACTED).....	(REDACTED)
PEREA, Audrey S., Tritium Room Supervisor, IWI.....	60
PULLEN, Brian, President, SRB.....	54
WILSON, Kenneth E., Consultant to IWI.....	44 & 51
WILSON, Patricia G., Executive Vice President, IWI.....	45 & 52
WYRICK, Ray D., QC Supervisor, IWI.....	59

THIS PAGE LEFT BLANK INTENTIONALLY



—

## Background

On April 28, 1995, OI:RIV was contacted (b)(7)(C) (b)(7)(D) that the new owners of IWI were selling night sights that the NRC had determined were not authorized under IWI's NRC license. (b)(7)(C) (b)(7)(D)

Health Physicist, Office of Nuclear Material Safety and Safeguards, who stated that IWI's license had not been amended, so the new owner could not sell anything not allowed under the old license. [NOTE: OI previously investigated IWI's sale of unauthorized night sights as case numbers 4-93-007R and 4-93-007S.] An Allegation Review Panel, held on May 8, 1995, requested that OI:RIV determine if the new owners of IWI were selling night sights not authorized under IWI's NRC license.

11

7C Porters

Documentation Review of Correspondence and Other Documents to/from the NRC and IWI

OI:RIV reviewed NRC documents concerning IWI. Documents deemed relevant to this investigation are included as exhibits to this report. Copies of records reviewed but not included in this report are being held in OI:RIV files and are available for review.

1. Memorandum from LUBINSKI to GREENE, with Registration No. NR-365-D-101-E, dated November 13, 1991 (Exhibit 3)

This memorandum stated that the NRC had completed IWI's Sealed Source device review and issued Registration Certificate NR-365-D-101-E. LUBINSKI requested that GREENE forward a copy of the certificate to IWI.

The registration was a compilation of night sight configurations, models RDI111, RBI010, SIC123, and gunsights, models CGF003, CGR030, GKF001, GKR010, SSF002, SSR020, SWF004, SWR040, and SWR041. Under the description, it stated that night sight configurations, models RDI111, RBI010, and SIC123 would be mounted in sights permanently fixed on weapons in conformance to the drawings. Also included was a list of weapons, which incorporated permanently fixed sights, to which IWI would attach these three models of night sights. It stated that for the other nine models, the sight could be sold separate or attached to a weapon.

2. NRC License #30-23697-01E Renewal Request from MOWRY, dated June 1, 1993 (Exhibit 4)

This letter requested that IWI's NRC license be renewed and changed. MOWRY requested that gunsight models HRS-001, HRS-002, and HFS-100 be added under Condition 10.B of IWI's NRC license to have "the proper wording in this section of our license and eliminate any more controversy."

3. Letter from K. WILSON to GREENE, dated November 28, 1994 (Exhibit 5)

This letter requested several changes to the provisions of IWI's NRC license, including changing it "to an all encompassing license, regardless of exterior shape or design provided certain minimum tolerances are maintained" and to "include other manufacturer's sights provided minimum tolerances are maintained."

4. Letter from Margaret FEDERLINE, Chief, NRC Medical, Academic, and Commercial Use Safety Branch, to K. WILSON, dated January 23, 1995 (Exhibit 6)

This letter requested additional information regarding the transfer of ownership of IWI and changes to IWI's NRC license. SECTION A 7 stated that IWI of Nevada must provide NRC with written confirmation that they were aware of all open inspection items concerning IWI's NRC license and accepted responsibility for possible resulting enforcement actions. SECTION B requested IWI review its current distribution program and previous applications and submit a complete application concerning distribution activities and products for review. The letter stated basic models could be registered as a "series," but a device review would be required for each basic model series. The letter further stated that the device review for HRS001, HRS002, and HFS100 sights was not completed, so these models were not authorized on IWI's license.

5. Letter from GREGOR to FEDERLINE, dated February 20, 1995 (Exhibit 7)

In response to SECTION A 7 of the NRC's January 23, 1995, letter, GREGOR stated "IWI of Nevada is fully aware of the commitment to the responsibilities of the Company and accepts this responsibility." In response to SECTION B, GREGOR stated that different tritium configurations, when IWI's license was amended, would be installed in any model sight regardless of exterior shape.

6. Memorandum from GREENE to IWI File, dated February 22, 1995 (Exhibit 8)

This memorandum to file detailed a meeting attended by GREENE, Robert WEISMAN and Catherine MARCO, NRC Office of the General Counsel, and K. WILSON on February 22, 1995. GREENE reviewed the provisions and conditions of NRC license No. 30-23697-01E with K. WILSON, including a detailed description of what devices were and were not covered under this license. K. WILSON was told this license was specific and limiting. GREENE and K. WILSON discussed IWI's letter dated February 20, 1995, and K. WILSON was told that complete drawings for each basic series type must be submitted, including dimensions, minimums and maximums, and tolerances. K. WILSON was informed that IWI could use other manufacturers as long as the products met the specifications of the submitted drawings for that type of gunsight for material and dimensions as authorized by IWI's NRC license.

7. Letter from GREENE to P. WILSON, dated April 3, 1995, and transmitting NRC license No. 30-23697-01E, Amendment No. 04, dated April 3, 1995 (Exhibit 9)

This license amendment, which other than condition 16, is identical to previous license amendments, authorized the distribution of luminous gunsights containing Sealed Light Sources (SRB Technologies, Inc., Model PRH-800/G/200).

The license amendment stated that the following must be mounted onto weapons: Model RDI111, Model RBI010, and Model SIC123.

The license amendment stated that the following were removable sights manufactured by IWI and could be sold separately or attached to weapons: Model CGF003, Model CGR030, Model GKF001, Model GKR010, Model SSF002, and Model SSR020.

The license amendment stated that the following were removable sights manufactured by the original equipment manufacturer and could be sold separately or attached to weapons: Model SWF004, Model SWR040, and Model SWR041.

In her letter to P. WILSON, GREENE stated that IWI was authorized to "distribute only those products containing radioactive material in the configurations specifically authorized in License Condition No. 10." She further stated IWI was required to notify the NRC and obtain an amendment if they planned to make any changes in their program which were contrary to the license conditions.

8. Letter from P. WILSON to GREENE, dated May 11, 1995 (Exhibit 10)

This document was a draft of changes IWI was requesting to their license. IWI requested to "change the license to an all encompassing license regardless of exterior shape or design or material used, provided that certain minimum and maximum tolerances are maintained and include the required labeling." The letter also stated "A complete inventory shall be kept of all products." Included with this letter were seven drawings of gunsight series.

9. Letter from Douglas A. BROADDUS, Mechanical Engineer, NRC Sealed Source Safety Section, to Bruce M. CASNER, Consultant to IWI, dated November 16, 1995 (Exhibit 11)

This letter was written in response to IWI's application requesting amendment to the NRC license to add additional products and sealed sources. BROADDUS stated that parts of the application were deficient and/or unclear and asked for additional information or clarification for numerous items.

#### Documentation Review of Records of Night Sight Sales by IWI

##### IWI's Sales Brochure (Exhibit 12)

IWI's sales brochure advertised the following night sight sets for sale: AMT Hardballer 45; Colt - all models; Colt "Clones"; Glock 17, 19, 20, 21, 22, 23, 24; Ruger; Sig Sauer 220, 225, 226, 228, 229, 230; Smith & Wesson; Rifle Sights - Colt and H&K; and Shotgun - Nightliner Sight. Other weapons were listed but the brochure stated "factory installation into existing sights" for those weapons.



## IWI Sales Records

On June 8, 1995, and October 20, 1995, OI reviewed a representative sampling of documents concerning IWI's sale of night sights from October 1, 1994, to October 20, 1995, including sales invoices, purchase orders, contracts, and work orders. The records were poor, incomplete, and/or undated.

On November 24, 1995, OI:RIV issued a subpoena to IWI for all sales records of night sights containing tritium between November 1, 1994, to the date of the subpoena (Exhibit 13). On December 21, 1995, OI:RIV received a box of copies of work orders from IWI. The reporting agent reviewed these documents and prepared a list of night sight sales by IWI (Exhibit 14). It appeared that IWI did not provide OI:RIV with all the applicable records, and on February 1, 1996, a letter was sent to IWI's attorney, Herbert M. JACOBI, as well as to GREGOR, asking that IWI records to be checked to determine if IWI submitted all records in compliance with OI:RIV's subpoena (Exhibit 15). On February 23, 1996, additional records were received from IWI along with a letter explaining IWI's reasons for not submitting all the required records (Exhibit 16).

The following is a summation of some of the pertinent sales records provided by IWI. Exhibit 14 provides more detail regarding these sales. Certain records are included as exhibits to this report as examples of the type of sales conducted by IWI and the type of records maintained by IWI. Except as delineated, these records are not being included as exhibits to this report, but they are being maintained by OI:RIV and are available for review.

1. Heckler & Koch - Records indicated that 2,000 gunsights containing 3,000 tritium inserts were shipped to H&K in June and July 1995 (Exhibit 17). Night sights for H&K were not authorized by IWI's NRC license to be sold loose or unmounted, although night sights were authorized to be sold fixed or installed on weapons.
2. Millett Sights - Records indicated that approximately 1,667 tritium inserts were shipped to Millett in gun sights manufactured by Millett in July and August 1995 (Exhibit 18). Night sights for Millett were not authorized by IWI's NRC license to be sold loose or unmounted.
3. IWI work orders and other sales records indicated that night sights were sold loose for shotguns, H&K rifles, AR-15s, ghost rings, and other weapons, to Ray Sandy, Quartermaster, Sightman, and other customers. These night sights were not authorized by IWI's NRC license to be sold loose or not mounted on weapons. Work orders were reviewed that noted the sale of 16 Sigma night sights to various customers. The Sigma sight was never submitted to the NRC for a device review. IWI records indicated the sale of 108 red tritium inserts to various customers. These records are not being included as exhibits to this report but are available at OI:RIV for review.
4. Miniature Machine Corporation (MMC), Fort Worth, Texas - Records indicated that approximately 6,392 tritium inserts were shipped to MMC in gunsights manufactured by MMC. With the exception of work order

12875 (Exhibit 19), which shows the sale of 90 red tritium inserts, these records are not being included as exhibits to this report but are available at OI:RIV for review.

Dale KREISMAN, President, MMC, provided copies of the drawings of MMC gunsights that use tritium inserts provided by IWI which are manufactured by MMC's subcontractor in Fort Worth. OI:RIV requested that John LUBINSKI, NRC Mechanical Engineer, Sealed Source Safety Section, compare these MMC drawings to drawings previously submitted by IWI to determine if, under IWI's current NRC license, IWI was authorized to insert tritium into the gunsights manufactured by MMC and distribute these sights. In a memorandum dated August 15, 1995 (Exhibit 20), LUBINSKI stated that the MMC drawings did not meet the provisions of the registration dated November 13, 1991.

#### Gunsight Drawings Provided by IWI (Exhibit 21)

On June 8, 1995, GREGOR provided OI:RIV with eight drawings of gunsights which he stated represented all the sights IWI manufactured through subcontractors, including Colt, S&W, Glock, and Sig Sauer sights.

#### Invoice from Model Products, Inc., to IWI (Exhibit 22)

Invoice 4656 from Model Products, Inc., dated March 6, 1995, indicated the manufacture and sale of S&W type sights by Model Products to IWI.

#### Review of Documentation Related to IWI's Purchase and Possession of Tritium from SRB and Ramrod/Lumitech

##### IWI's New Mexico Possession License Number GS281-07

This license, dated December 16, 1994, authorized the possession of tritium (Saunders-Roe Model 252050G, 252050Y, 252020T, and 251030G) (Exhibit 23). A request to amend this license to add tritium received from Lumitech was allegedly sent to the state of New Mexico on June 14, 1995 (Exhibit 24). William FLOYD, Program Manager, New Mexico Environment Department, Radiation Licensing and Registration Section, told OI:RIV that New Mexico had no record of receiving this amendment request. Following an inspection of IWI by the state of New Mexico, IWI's New Mexico license was amended on July 24, 1995, to include Lumitech tritium (Exhibit 25).

##### Facsimiles from SRB to NRC OI:RIV

By facsimile dated June 23, 1995, Brian PULLEN, President, SRB, stated that the last tritium shipment by SRB to IWI was on February 15, 1995 (Exhibit 26). He attached a letter from Ramrod Manufacturing Ltd. (Ramrod) to Arotek Ltd. dated February 20, 1995, which stated that IWI had been appointed Ramrod's sole agent in the United States for the sale of tritium. By facsimile dated June 27, 1995, PULLEN stated that the South African manufacturer of tritium was the Atomic Energy Corporation of South Africa Limited (Exhibit 27).

Invoices from SRB to IWI (Exhibit 28)

The following tritium inserts were sold by SRB to IWI from October 1994 to October 1995.

<u>INVOICE NUMBER</u>	<u>DATE</u>	<u>QUANTITY</u>
SRB1260	October 31, 1994	11,000
SRB1276	November 14, 1994	16,750
SRB1341	January 3, 1994 [sic. 1995]	22,500
SRB1398	February 15, 1995	22,500
GRAND TOTAL		72,750

The price to IWI per insert varied from \$0.98 to \$1.12.

Invoices from Ramrod to IWI (Exhibit 29)

The following tritium inserts were sold by Ramrod to IWI from May 1995 to October 1995.

<u>INVOICE NUMBER</u>	<u>DATE</u>	<u>QUANTITY</u>
1001	May 9, 1995	7,370
1003	June 6, 1995	20,630
1004	July 5, 1995	28,000
GRAND TOTAL		56,000

The price to IWI per insert was \$0.70.

Facsimile from Mark AGER, Director, Ramrod, to GREGOR, dated February 13, 1995 (Exhibit 30)

This facsimile stated that Ramrod was sending tritium insert samples to IWI on this date and they or Lumitech [the facsimile is unclear] were manufacturing additional samples to provide to IWI.

Letter from P. WILSON to NRC OI:RIV, dated July 5, 1995 (Exhibit 31)

This letter, in response to an inquiry by OI on June 30, 1995, stated that in January 1995, IWI decided they needed an alternative source of tritium because SRB was going into competition with IWI. IWI decided to pursue a relationship with Ramrod of South Africa, and GREGOR went to South Africa. P. WILSON stated there was no written contract between IWI and South Africa.

Letter from GREGOR to GREENE, dated July 7, 1995 (Exhibit 32)

This letter stated that IWI was in the process of changing their tritium supplier from SRB to Lumitech, but GREGOR did not tell the NRC that IWI had already received tritium from Lumitech. Additionally, GREGOR stated he was enclosing drawings which contained the overall dimensions and source mounting

configurations for each series type. He said he understood a device review was required for the new mounting configurations.

Letter from GREGOR to GREENE, dated July 17, 1995 (Exhibit 33)

This letter stated that some of the South African tritium had been matched for color and brightness and could be mixed in with SRB tritium. GREGOR said there was no way to determine if South African tritium had been inserted into gunsights and shipped, so IWI was stopping all production until the NRC approved the distribution of South African tritium. GREGOR further stated he had requested the technical information from South Africa required by the NRC to amend IWI's license and hoped to provide that to GREENE within 24 hours.

Telephone Conversation Record by GREENE, dated July 17, 1995 (Exhibit 34)

This stated that CASNER had visited with GREENE and asked if the information provided regarding the South African tritium was sufficient. GREENE said she was forwarding it to the Sealed Source Safety Section for a device review, which would probably take at least 6 months.

Letter from GREGOR to GREENE with Attachments, dated July 18, 1995 (Exhibit 35)

GREGOR provided information regarding the South African tritium, including a description of the tritium provided by Lumitech and Ramrod invoice number 1003, dated June 6, 1995, reflecting the sale of 20,630 tritium inserts to IWI.

Letter from CASNER to Patricia SANTIAGO, Assistant Director for Materials, NRC, dated July 19, 1995 (Exhibit 36)

CASNER stated IWI made a "major management decision" to stop shipping product even though they had no way of knowing if South African tritium was mixed into existing stock of SRB tritium.

Telephone Conversation Record by GREENE, dated July 21, 1995 (Exhibit 37)

GREENE stated she had met with CASNER and discussed the South African tritium with him. She told him IWI could not distribute the tritium without a device review. CASNER stated he believed the tritium had been received at IWI but none had been distributed. He said the required information for the device review would be provided to the NRC within 1 week.

INVESTIGATOR'S NOTE: The information provided on this record does not match the date shown on it. According to other records, by July 21, 1995, the NRC had already received the information regarding the South African tritium.

Memorandum from SANTIAGO to File, dated July 24, 1995 (Exhibit 38)

SANTIAGO said CASNER told her he understood IWI's request, to distribute South African tritium, would be expedited because IWI could not afford to pay SRB



prices, and they needed to begin distribution again within 2 weeks. SANTIAGO told CASNER the device review might take up to 6 months, and IWI could only distribute in accordance with their current NRC license.

Letter from CASNER to SANTIAGO, with Attachments, dated July 24, 1995 (Exhibit 39)

CASNER reiterated his concern that IWI might have to close down if the NRC did not approve the distribution of South African tritium. CASNER said the decision to voluntarily stop shipping all product in order not to distribute South African tritium was a hardship to IWI and was why he [CASNER] requested an expedited amendment of IWI's NRC license.

CASNER said GREGOR had contacted SRB a few days earlier to ascertain if SRB would sell them tritium, but SRB quoted a price considerably higher than the price previously paid by IWI. CASNER stated "this closing off of legal tritium supply" meant IWI had no way to obtain tritium, and IWI had no source of income until Lumitech was listed on their license. CASNER reiterated his request for an expedited license amendment due to "extreme hardship caused by the cessation of product shipment and the resulting interruption of its cash flow...."

Telephone Conversation Record by GREENE, dated July 25, 1995 (Exhibit 40)

GREENE said she spoke with KREISMAN who stated he was concerned about IWI's possibly not being able to continue to provide night sights due to the situation with the South African tritium. KREISMAN said MMC's work schedule was based on the availability of night sights from IWI which was dependent upon tritium sources from South Africa. GREENE told KREISMAN IWI's request for a device review had been received by the NRC the previous week and such a review typically took 6 months.

Tritium Inventory Forms Provided by IWI (Exhibit 41)

IWI provided inventory record forms for May 22, 1995, to June 2, 1995, and the latest inventory record forms dated October 9, 1995, to October 13, 1995. Upon reviewing the tritium inventory sheets, the reporting investigator noted the addition of 1700 red tritium inserts, 5000 green 250 inserts, and 670 green 150 inserts on May 22 [1995]. According to IWI records provided and to testimony, no SRB tritium had been received by IWI after February 15, 1995, and no South African tritium had been received by IWI prior to that related to an invoice dated June 6, 1995. Audrey PEREA was interviewed and stated South African tritium had been received in May 1995. She believed some might have been received even earlier when AGER came to IWI because the first red tritium received was "dead" as noted on the inventory form and had to be returned to South Africa. K. WILSON then located an invoice from Ramrod dated May 9, 1995, showing the sale of 7,370 tritium inserts to IWI (Exhibit 30, p. 1).

Although an exact total could not be obtained, a review and comparison of the tritium inventory dated May 22, 1995, and the tritium inventory dated October 13, 1995, showed that the South African tritium was being matched and inserted into tubes and mixed in with the existing SRB tritium inventory.

The record further showed that by May 22, 1995, IWI was out of raw green 150 tritium lights received from SRB and by May 25, 1995, IWI was out of raw green 250 tritium lights received from SRB. All red tritium inserts were from Lumitech because SRB does not make red tritium.

The tritium inventory shown on the forms at close of business on October 13, 1995, totals 71,088, which includes raw tritium lights and tritium inserted into plastic sleeves. The section on the inventory forms entitled, "Plastic" is the total for the plastic sleeves and not for tritium. Further, this total of 71,088 does not include tritium inserted into gunsights that may still be at IWI and not yet distributed or sold to customers. NRC investigators and IWI representatives attempted to determine total tritium on hand at IWI, both South African and SRB. With the assistance of PEREA, the investigators attempted to match tritium on hand with the count but were unsuccessful.

Confirmatory Action Letter From NRC to IWI, dated December 22, 1995 (Exhibit 42)

This letter stated that IWI would immediately cease all distribution of Lumitech sources, describe the method used to segregate the Lumitech sources from the SRB sources to preclude further distribution of Lumitech sources, and cease distribution of gunsights not specifically authorized in IWI's NRC license. The NRC also requested a list of all sights distributed with Lumitech sources and all gunsights distributed by IWI that were not identified in IWI's NRC license. They also requested clarification of the relationship between IWI of New Mexico, IWI of Nevada, and 21st Century Technologies, Inc.

Letter from CASNER to NRC, dated January 22, 1996 (Exhibit 43)

CASNER stated that the Lumitech inserts had been segregated and could not be inadvertently distributed by IWI. He stated that 32 tubes of Lumitech sources had been shipped to MMC (24 tubes had been returned) and 12 additional red inserts had been "unintentionally sold" to other IWI customers. CASNER stated that IWI had sold night sights to MMC and Millett, but none of these devices "contained nonapproved tritium sources or were unlicensed models."

INVESTIGATOR'S NOTE: Records indicate that 90 tubes of Lumitech red tritium were sold to MMC. Neither MMC nor Millett gunsights were authorized under IWI's NRC license for tritium insertion and distribution as loose unmounted night sights.

CASNER additionally stated that his letter served as "written notice that IWI has ceased distribution of gunsights not specifically authorized in License condition 10." He said IWI of Nevada changed its name to 21st Century Technologies, Inc., and IWI of New Mexico was a wholly owned subsidiary of 21st Century Technologies, Inc.

Allegation No. 1: Alleged Deliberate Violation of License Conditions by Selling Night Sight Configurations or Loose Night Sights Not Authorized by the NRC License

## Testimony

The following individuals were interviewed regarding [REDACTED] allegation that IWI was deliberately violating its NRC license conditions by distributing unauthorized luminous gunsights containing tritium, and they stated substantially as follows:

### Interview of K. WILSON (Exhibit 44)

K. WILSON said he was an independent businessman who became involved in IWI in August 1994 at MOWRY's request. In September 1994, he became aware that IWI had some difficulties with the NRC. Neither he nor his wife, P. WILSON, knew anything about night sights, tritium, NRC regulations, or had extensive knowledge of weapons. K. WILSON said he was a consultant and was never a corporate officer or director of IWI and was unfamiliar with the day-to-day operations. In October 1994, MOWRY resigned as president of IWI and GREGOR became president. K. WILSON said in February 1995, he met with NRC officials in Rockville, Maryland, to determine what was "wrong" with IWI's NRC license and how to correct it. He said despite reviewing the NRC license and meeting with the NRC, he still did not know what to do to correct IWI's NRC license.

### Interview of P. WILSON (Exhibit 45)

P. WILSON said, at MOWRY's request, K. WILSON and she became involved in IWI, although neither knew anything about night sights, tritium, the NRC, or had extensive knowledge of weapons. GREGOR is IWI's president, P. WILSON is executive vice president, and K. WILSON, a consultant to IWI, handles all NRC matters. P. WILSON said she reviewed documents, including the NRC license, in a book provided by MOWRY that he said contained all NRC correspondence. She and K. WILSON had a hard time understanding the NRC license and what needed to be done to correct it. She said she believed IWI could insert tritium into any gun sight listed in the November 1991 registry and could purchase any Glock, Sig Sauer, Colt, and S&W sights, insert tritium into them, and sell them. P. WILSON said she was unaware that IWI's license restricted them to purchasing S&W sights from the original equipment manufacturer (OEM) and admitted they had not purchased from the OEM, but had the sights manufactured by a local company.

P. WILSON said IWI was not purchasing sights from any other company; they used existing sights or sights manufactured for IWI by an iron work company. GREGOR had designed and manufactured a sight to be used on a S&W Sigma gun and IWI inserted tritium into that sight which had never been approved by the NRC. She said she never thought about it and never realized inserting tritium into that sight was a violation of IWI's NRC license. Recently, she determined IWI should not be selling rifle or shotgun sights loose, and they no longer did so, but she could not recall what led her to that conclusion.

P. WILSON said the NRC license was confusing, dealing with the NRC was difficult, and they lacked knowledge of what needed to be done to straighten out the license. After a discussion with the reporting investigator, P. WILSON said they were "reading from the same page," and she understood what the NRC license allowed.

7C Portuno

INVESTIGATOR'S NOTE: GREENE was contacted at that time and held a conference call with P. WILSON, K. WILSON, and GREGOR to discuss IWI's current pending application for license amendment.

Interview of GREGOR (Exhibit 46)

GREGOR said he began working for IWI in late June or early July 1994 as a machinist and gunsmith in the "backroom," and on October 28, 1994, he became president of IWI when MOWRY was removed from that position. He was never involved in shipping and receiving, stamping the night sights, or inserting tritium into the sights. He was aware that IWI had problems with the NRC, but MOWRY never discussed them with the employees, so he was unaware of the nature or extent of the problems. He said he was now "somewhat involved" in paperwork and day-to-day operations, but he still preferred to work "in the back." P. WILSON handled much of the day-to-day operations.

GREGOR assumed that the night sights IWI was currently selling were approved by the NRC and that IWI was in compliance with NRC regulations. He provided drawings of what he said were all the sights IWI was manufacturing through subcontractors, including Colt, S&W, Glock, and Sig Sauer sights. GREGOR said he was unaware that the NRC license stated that tritium could only be inserted into OEM S&W sights to be sold as loose night sight sets. He admitted IWI had S&W type sights manufactured for them by local iron work companies.

GREGOR admitted IWI manufactured, inserted tritium into, and sold as a loose sight set, a sight for the S&W Sigma gun. He admitted IWI did not submit this sight to the NRC for device review and approval because he never thought about it and failed to realize this would be a violation of IWI's NRC license and NRC regulations.

GREGOR said he had read IWI's NRC license, and MOWRY gave him a black book, after he resigned, which MOWRY said contained the NRC license and other communication between IWI and the NRC. GREGOR seemed to be unfamiliar with the NRC, said he had never met GREENE, and he let P. WILSON and K. WILSON handle discussions with the NRC.

7c Porturo



Interview of DODGEN (Exhibit 49)

DODGEN said MMC manufactured gunsights, which were different from those manufactured by other companies, and which were patent pending. He said MMC's sights were manufactured by a subcontractor and were sold as packaged sets. Tritium inserts were purchased only from IWI, under a verbal agreement between MMC and IWI, dating from the beginning of 1995. He said MMC had received their last shipment from IWI on approximately July 20, 1995, and MMC had recently received some sights with red tritium inserts.

Interview of KREISMAN (Exhibit 50)

KREISMAN said MMC sights were proprietary adjustable sights with design and utility patents pending. MMC's sights were small, low profile, snag free, durable, fully machined, and heat treated to Rockwell 40. MMC optimized the sight design for each make of weapon, currently offered the Colt 1911, Glock, and Heckler and Koch USP [NFI] sights, and would be adding Sig Sauer sights within the next 90 days. These pistol sights were offered in all black, white dot or outline, and with tritium inserts provided by IWI. MMC was currently working on a tritium option for front shotgun sights and hoped to have it available shortly.

KREISMAN explained that he first met K. WILSON and GREGOR at the "shot show" in Las Vegas [January 1995]. Shortly after the "shot show," MMC had night sight prototypes manufactured and provided by the three sources of night sights in the United States, and KREISMAN decided to purchase from IWI.

GREGOR provided gunsight dimensions, specifications, and tolerances to KREISMAN, which he [GREGOR] said the sights had to meet to be within NRC requirements. MMC incorporated this data into its gunsight designs and drawings and provided the drawings to IWI. MMC's subcontractor, Horizon Technological Industries, Inc., performed the machining, including engraving H-3 and P-T on the gunsights, sent them to MMC for quality control checks, and MMC sent them to IWI for tritium insertion.

IWI was MMC's sole source of tritium inserts, but IWI and MMC had no written contract, only a verbal agreement. KREISMAN said he had problems dealing with IWI personnel, and in late March or early April 1995, he met with K. WILSON to discuss the arrangement between MMC and IWI. At that time, MMC had only received a few sights for evaluation purposes. He said K. WILSON explained IWI had problems with financing, obtaining tritium inserts, and the NRC.

KREISMAN said MMC had not received any sights from IWI within the last week or so, but MMC was sending several hundred sights to IWI on August 2, 1995, for tritium insertion. In addition to receiving MMC manufactured sights with tritium inserts from IWI, MMC had purchased some front sights manufactured by IWI. KREISMAN explained that MMC's current proprietary sights were rear gunsights that were machined by MMC and were patent pending, but MMC purchased some front sights from other manufacturers.

KREISMAN said he telephoned GREGOR after the reporting investigator's initial visit to MMC and asked "what was going on." GREGOR told him IWI had shut down

all production for 1 week to ensure that IWI was in accordance with their permits and to try to separate SRB and Lumitech tritium inserts since IWI could not distribute the South African tritium. Several days later [NFI], GREGOR telephoned him [KREISMAN] and told him IWI had green and yellow inserts from SRB, which they could continue providing to MMC, but there were no orange or red inserts available from SRB. GREGOR said he had attempted to purchase more tritium inserts from SRB, but they had raised their price 1,000 percent and were trying to drive IWI out of business since they would be their direct competitor after SRB received its NRC license.

INVESTIGATOR'S NOTE: Following the receipt of additional information [REDACTED] and interviews of DODGEN and KREISMAN, K. WILSON, P. WILSON, and GREGOR were reinterviewed by OI:RIV. 7C

#### Reinterview of K. WILSON (Exhibit 51)

K. WILSON said he read IWI's NRC license when IWI's corporate structure changed [October 1994], but did not understand it. He believed IWI could "do" any sight that they received, but he knew the license was "ambiguous" and needed to be amended.

K. WILSON met with GREENE and other NRC representatives in Rockville, Maryland, but left that meeting confused and uncertain what sights IWI could sell. GREENE said the license was "very narrow," and IWI needed to amend their license to compete in the market. GREENE provided some examples of sights IWI could manufacture and said they were limited. K. WILSON was told that instead of naming sights, IWI needed to list minimum and maximum tolerances and be general in the type of substance into which tritium would be inserted. K. WILSON said he told GREGOR he [GREGOR] needed to determine maximum and minimum tolerances of each sight and amend IWI's NRC license.

K. WILSON said IWI had sold night sights to MMC, but he was unfamiliar with these sales and MMC's product line. K. WILSON said IWI was currently "barely" in business, but he did not know how many night sights they had sold during the last year.

#### Reinterview of P. WILSON (Exhibit 52)

P. WILSON said from her reading of the NRC license, IWI could manufacture and sell Glock, Sig, Colt, and S&W sights. Until the reporting investigator's visit to IWI in June 1995, she had been unaware that the license limited the manufacture of S&W sights to OEM. She also believed IWI could install tritium into any sights on weapons listed in the November 1991 registry. P. WILSON said she understood there was a difference between the nine categories of removable sights listed on IWI's NRC license and weapons where IWI mounted the sources onto the weapon. She believed IWI could put tritium into existing sights on the weapons listed on the registry.

P. WILSON said she did not know IWI had any problems with the NRC until the fall of 1994 when she found a letter from the NRC to IWI referencing "abeyance of the case." She believed the problem with the NRC related to selling unstamped sights to Colt and Millett and did not recall problems with IWI

selling unmounted sights to Millett or others. P. WILSON said she found the NRC license ambiguous and initially IWI was inserting tritium into any sights and selling them. She said after the reporting investigator's initial visit to IWI, she believed she understood the license. They are currently inserting tritium into existing sights for weapons named on the November 1991 registry.

P. WILSON said GREGOR handled the sales to MMC, and she had no knowledge about these sales or MMC's sights. She said she did not believe IWI had sold sights to Wilson's Gun Shop since MOWRY left IWI, and she did not know if IWI had sold night sights to Scattergun Technologies or Millett. She said GREGOR handled sales to Millett, H&K, and Taurus. P. WILSON said GREGOR made the final decision as to which sights to sell, stating "the buck stops with Dave."

P. WILSON explained that the front sights had one tritium insert, and the back sights had no more than two tritium inserts. She said IWI's accountant was working on a report and might be able to determine how many sights or tritium inserts had been sold by IWI since January 1, 1995. She said she believed they sold about 800 sights in January 1995 and the same in February 1995 because sales were bad the first quarter of 1995.

#### Reinterview of GREGOR (Exhibit 53)

GREGOR said IWI was a tritium night sight company, when he began working at IWI they put night sights on "anything that came in the door," and he initially believed they were allowed to do that. GREGOR said he did not understand the NRC license and assumed IWI could put tritium into any sights. He said IWI was selling night sights for all weapons.

GREGOR said he and P. WILSON made the decisions concerning IWI. He said he was aware of a "black book" MOWRY had containing NRC correspondence, and he looked through it but did not read it. GREGOR said K. WILSON went to NRC headquarters to try to alleviate the problems with the license. When K. WILSON returned, he said IWI needed to be generic and cite minimum and maximum tolerances, but GREGOR did not recall if they discussed what IWI was authorized to sell under the current license. GREGOR said he did not know if IWI sold specific night sights mounted or unmounted for specific weapons.

GREGOR said he met KREISMAN at a "shot show" in Las Vegas, and IWI began providing tritium inserts for sights which were manufactured by MMC, sent to IWI for tritium insertion, and returned to MMC. GREGOR believed IWI could do that because IWI had done that in the past with Millett, Wilson, and others. He believed that would be acceptable as long as the sights were manufactured to minimum and maximum tolerances. GREGOR said he believed he got those tolerances from a book from IWI's prior management.

GREGOR said he did not know the sights by MMC were not authorized by the NRC license. He said he did not know IWI had problems with the NRC as a result of sales to Millett, other than for improper stamping. GREGOR said he did not understand the NRC license, took no steps to understand it, and tried to amend it so IWI could be competitive in the market, although he did not understand what modifications needed to be made to the license. GREGOR said IWI was limited to some degree as to what they could do, but the limiting factor was

confusing. He said one limiting factor was S&W sights were to be OEM, but he did not realize that until the reporting investigator's visit to IWI in June 1995. He believed they were limited in configurations, colors, and how the sight should look. GREGOR said there were no night sights IWI did not sell, mounted or unmounted. GREGOR said he did not know where the MMC and Millett sights would fall into the NRC license, and he took no steps to determine if those sights were authorized by the NRC license. He believed if the sight was for a particular weapon, such as a Glock, it was the same as a Glock sight, regardless of who manufactured it.

GREGOR said he submitted configurations, tritium information, and paperwork to the NRC for a device review about 1 or 2 weeks prior to this interview [October 1995]. GREGOR said IWI wanted to manufacture sights for weapons other than Colt, Glock, and Sig Sauer, particularly for S&W.

GREGOR said he did not recall providing the reporting investigator with drawings of sights IWI was manufacturing. He said he did not recall discussing Sigma sights with the reporting investigator and denied that IWI had sold such sights until he was provided invoices showing IWI had sold them. He claimed he did not know if IWI had requested a device review for the Sigma sight prior to manufacturing and selling it.

GREGOR said IWI had not sold night sights to Wilson's Gun Shop, had sold to Millett, and he did not recall if they sold to Scattergun Technologies since he became president of IWI. MMC is currently a customer of IWI.

GREGOR said what he believed was ambiguous about the NRC license was the term "mounted" and "unmounted" and "sold separately" or "attached to weapons," but he was unable to state specifically what he believed was ambiguous about these terms. He believed the term OEM was ambiguous because S&W contracted the manufacture of their sights to sight companies. He found the model numbers listed on the license to be confusing, although he admitted IWI had drawings of those models. He also found the NRC license's reference to various letters and other communication to be confusing but admitted he never asked the NRC for copies of these things.

### Conclusions

Based on the evidence developed during this investigation, it is concluded that IWI, specifically GREGOR and P. WILSON, deliberately violated the conditions of IWI's NRC license by selling certain night sights unmounted.

Allegation No. 2: Alleged Deliberate Violation of License Conditions by Selling Gun Sights Containing Tritium from a Source Not Authorized by the NRC License

### Testimony

The following individuals were interviewed regarding [redacted] allegation that IWI was deliberately selling gunsights containing tritium from a source not authorized by its NRC license and they stated substantially as follows:

7C  
Porter



Interview of P. WILSON (Exhibit 45)

P. WILSON said IWI received tritium from SRB, but had not purchased any in quite awhile because they had large quantities in stock. She provided copies of what she stated were all tritium invoices from SRB since September 1994.

[REDACTED]

[REDACTED]

7C

Interview of PULLEN (Exhibit 54)

PULLEN said someone with Arotek, Ltd, told him AGER said that Ramrod could not sell tritium to Arotek, but they were forwarding Arotek's inquiry to IWI, Ramrod's sole agent in the United States.

PULLEN said he had met K. WILSON at a gun show in early 1995 and determined IWI knew nothing about tritium and did not understand [NRC] regulations.

Interview of P. WILSON (Exhibit 55)

On June 30, 1995, P. WILSON said IWI was currently working on an agreement to receive tritium inserts from someone other than SRB, but she did not know the name of the company or the particulars about the proposed agreement. She said K. WILSON was handling the negotiations with the other company which she believed was from South Africa. P. WILSON said IWI had decided to apply for a new NRC license rather than try to amend the old one, and included in that application, would be a request to obtain tritium inserts from the new source.

[REDACTED]

[REDACTED]

7C

Interview of GREGOR (Exhibit 56)

GREGOR said during a "shot show," in January 1995, it came to IWI's attention that SRB had applied for an NRC license and would be a direct competitor of IWI. GREGOR was aware that SRB was listed on IWI's NRC license as the sole source of tritium inserts, and IWI decided they needed to find another source of tritium inserts. During that same show, AGER told IWI that he could obtain tritium from Lumitech in South Africa. GREGOR said they decided to pursue the possibility of obtaining tritium inserts from Lumitech through Ramrod.

GREGOR said he went to South Africa, in the end of March or early April 1995, met with Ramrod and Lumitech officials, and toured the Lumitech facility. Lumitech was a South African government entity under the auspices of the Atomic Energy Commission, and Ramrod made the tritium inserts for Lumitech. GREGOR said when he left South Africa, there was a verbal agreement that IWI would purchase tritium inserts from Lumitech through Ramrod. He said there was still no written contract between IWI and either Lumitech or Ramrod.

GREGOR said approximately 1 month ago IWI received some sample tritium inserts from Lumitech and some green inserts. Upon further questioning, he admitted they also received some orange and yellow inserts from Lumitech. He said IWI received the inserts to check them and ensure they would meet IWI's needs. He said Lumitech would also eventually provide red and blue inserts but had not yet done so. GREGOR stated Lumitech or Ramrod tritium inserts had not been used in any gunsights distributed by IWI, sold by IWI, given by IWI, or in any manner provided by IWI to anyone. Upon further questioning regarding quantity received and a request for copies of invoices showing purchases from Lumitech and/or Ramrod, GREGOR said it was possible some of the tritium inserts were used in gunsights sold or provided by IWI to customers.

GREGOR had no response as to why IWI would have sold gunsights with Lumitech tritium inserts, when he earlier admitted he was aware that the NRC license authorized only SRB tritium inserts. He said he thought they could receive tritium under their New Mexico possession license. He said IWI's consultant was meeting with GREENE on July 14, 1995, and providing her with IWI's application for a new NRC license which included information regarding Lumitech.

INVESTIGATOR'S NOTE: The reporting investigator told GREGOR that did not authorize IWI to distribute night sights utilizing Lumitech inserts because that was not approved under IWI's current license.

#### Interview of FLOYD (Exhibit 57)

FLOYD stated that IWI's New Mexico possession license was dated December 16, 1994, and authorized them to possess only SRB tritium inserts. He said the state of New Mexico had no record of receiving an amendment request form nor did they act on any request by IWI to possess Lumitech tritium inserts.

#### Reinterview of FLOYD (Exhibit 58)

FLOYD said the state of New Mexico conducted an inspection of IWI on July 20, 1995, and found a fairly large quantity of tritium inserts at IWI's facility, some of which IWI admitted had been received from Lumitech. FLOYD said he could not tell by looking at them which inserts were received from SRB and which were received from Lumitech.

FLOYD said K. WILSON and GREGOR told him IWI had submitted an amendment request to the state of New Mexico so they believed they were authorized to possess tritium from South Africa. FLOYD reiterated that New Mexico never received this amendment request. FLOYD said IWI told him they had "voluntarily" discontinued sales of tritium night sights because they had

mixed the inserts from SRB and Lumitech together and could not tell the difference between them. FLOYD said boxes were stacked up in a store room that IWI said contained packaged night sights they were not sending out until the NRC authorized the Lumitech inserts. FLOYD said the only other violation he identified was a lack of inventory of tritium sales. FLOYD said the state of New Mexico was going to amend IWI's license to allow them to possess tritium from Lumitech and they planned no further action.

Interview of DODGEN (Exhibit 49)

DODGEN said MMC had received some red tritium inserts from IWI. DODGEN said he did not know IWI's source of tritium.

INVESTIGATOR'S NOTE: SRB does not manufacture red tritium inserts.

Interview of KREISMAN (Exhibit 50)

In late March or early April 1995, K. WILSON told KREISMAN that IWI had located a source of tritium in South Africa, and they did not expect a break in production when they switched from SRB to the new supplier. KREISMAN said K. WILSON told him IWI had "some additional permitting" to do before they could accept receipt of the South African tritium, but they had recently received a large quantity from SRB that they believed would last until they "transitioned" to the South African supplier. KREISMAN said K. WILSON did not elaborate or explain what he meant by "additional permitting," and he [KREISMAN] did not ask him to elaborate.

Reinterview of K. WILSON (Exhibit 51)

K. WILSON said it was "absolutely" his understanding that IWI's source of tritium inserts was in Canada and that was what was on IWI's NRC license. K. WILSON said after PULLEN told him, in January 1995, that he [PULLEN] was going to put IWI out of business, he [K. WILSON] determined IWI needed another source of tritium. At that same time, he met some individuals from Lumitech who said they could supply IWI with tritium, and he [K. WILSON] discussed that possibility with IWI. He believed GREGOR met with Lumitech officials in South Africa in March 1995. K. WILSON said he did not discuss tritium with anyone from Lumitech or Ramrod although someone [NFI] from Ramrod was at IWI in June 1995. K. WILSON said he did not know who at IWI handled the purchase of tritium from Lumitech, when IWI first received tritium from Lumitech or Ramrod, or how much tritium or how many shipments of tritium IWI received from Lumitech or Ramrod.

K. WILSON said in April 1995, he contacted the state of New Mexico to find out how to change IWI's possession license. He then told GREGOR and P. WILSON they needed to submit an application to New Mexico to amend IWI's possession license if they changed tritium suppliers. K. WILSON said he never had any discussion with anyone at the NRC about purchasing tritium from a source other than SRB or about amending IWI's NRC license if they changed tritium suppliers. He believed CASNER was handling that issue.

K. WILSON said he did not know if IWI had sold any night sights containing

South African tritium, and he never told GREGOR or P. WILSON they could use South African tritium in night sights.

Reinterview of P. WILSON (Exhibit 52)

P. WILSON said she is the direct "boss" of IWI's supervisors, including shipping and purchasing. P. WILSON said PEREA, the supervisor of the tritium room, told her [P. WILSON] when she was running low in a certain size or color of tritium; P. WILSON told GREGOR, and GREGOR ordered the tritium. P. WILSON said she had read IWI's NRC license and was aware that SRB was named on the license as the authorized supplier of tritium although IWI had purchased tritium from a source other than SRB.

P. WILSON said in January 1995, PULLEN told her and K. WILSON that SRB was getting an NRC license and would be in competition with IWI to sell night sights. P. WILSON said also in January 1995, AGER approached K. WILSON about selling tritium inserts to IWI from a South African source, and either K. WILSON or GREGOR decided to pursue this possibility.

P. WILSON said K. WILSON discussed amending IWI's NRC license with GREENE, but she did not know if this included changing IWI's tritium source. P. WILSON never discussed changing IWI's source of tritium with anyone from the NRC.

P. WILSON said in the spring of 1995, GREGOR went to South Africa to inspect Lumitech. GREGOR subsequently provided Lumitech and/or Ramrod with IWI's tritium insert specifications, such as type, size, and dimensions. She said GREGOR and possibly K. WILSON handled all negotiations with Ramrod and Lumitech concerning the purchase of tritium, and she was not involved with them. At some point, P. WILSON did not remember when, GREGOR decided to purchase tritium from Ramrod or Lumitech. There was never any written contract between IWI and Lumitech, but a purchase order was sent by IWI for the first purchase of tritium. P. WILSON said only she and GREGOR were authorized to sign purchase orders, so one of them must have signed the purchase order for the tritium from Lumitech, but she could not recall who signed it. She believed the purchase order was sent by facsimile to Lumitech in the spring of 1995, and the first order of tritium from Lumitech was received by IWI in the spring of 1995. P. WILSON said all tritium was purchased from Lumitech on purchase orders, none was purchased verbally, but she did not know how much tritium IWI had ordered or received from Lumitech. IWI has not received any tritium from SRB since receiving its first order of tritium from Lumitech.

P. WILSON said she knew that New Mexico's possession license only authorized IWI to possess SRB tritium, so IWI sent an amendment to New Mexico in the spring of 1995 to add Lumitech to their possession license. The state of New Mexico conducted an inspection of IWI and stated they [New Mexico] had never received an amendment request from IWI to change the source of tritium. New Mexico subsequently issued IWI an amended possession license adding Lumitech to the license.

P. WILSON said she was aware that IWI's NRC license only authorized the distribution of SRB tritium. IWI purchased tritium from Lumitech for research



and testing and subsequently filed an amendment request with the NRC in the late summer or early fall 1995 to add Lumitech to the license. P. WILSON said she understood IWI was still operating under its current license, which shows an expiration date of 1993. P. WILSON said there was no reason she failed to mention the negotiations with South Africa and that IWI was changing tritium suppliers to the reporting investigator on June 8, 1995, or neglected to state in her letter to the NRC dated June 30, 1995, that IWI had already ordered tritium from Lumitech or Ramrod.

P. WILSON said she was unaware of any sales by IWI of gunsights containing tritium purchased from Ramrod, Lumitech, or anyone other than SRB. P. WILSON said she was ultimately responsible for all sales of night sights by IWI. She said when they received the tritium, it was inventoried and placed in a safe. GREGOR and PEREA had access to this safe, and PEREA removed the tritium as it was needed to insert into gunsights. P. WILSON said she believed the South African tritium was kept segregated from the SRB tritium although they were both kept in the same safe. The South African tritium was inventoried and kept in bags. The SRB tritium was taken out of the bags, separated according to size and color by PEREA, blocked, and put into plastic tubes ready to be installed. P. WILSON said she believed she told PEREA not to use the South African tritium and as far as she knew, PEREA did not use it.

P. WILSON said she had never read a letter sent by GREGOR to the NRC dated July 17, 1995, and had no knowledge it had been sent to the NRC. She said IWI stopped production for 1 week because GREGOR told her IWI had to inventory the tritium and ensure no South African tritium was being installed into sights. PEREA performed this inventory and added all South African and SRB tritium together in all sizes and colors and had one total for all tritium on hand at IWI. P. WILSON said GREGOR told her to ensure no South African tritium was being used, and she again told PEREA not to use the South African tritium. However, the inventory indicated some of the South African tritium was missing. The only South African tritium she could determine conclusively was missing was red tritium because SRB did not supply red tritium which had only been received from Lumitech. She said GREGOR had put some red tritium into inserts for research and development, and they could not obtain a definitive count of the red tritium. P. WILSON said they never performed separate inventories for the South African and SRB tritium.

P. WILSON said after the 1 week in July when IWI stopped production, IWI went back into production and shipping night sights. She began spot checking the orders and everyone had been told not to use South African tritium. She admitted she would not know, other than the red, if it was South African or SRB tritium, but said there was no reason for them to use South African tritium because there was enough Canadian tritium in blocks, and she checked the Canadian tritium supply weekly which was getting low.

#### Reinterview of GREGOR (Exhibit 53)

GREGOR stated he handled all the gunsmithing and had been involved in writing the amendments to the NRC license. GREGOR said he had no involvement with purchasing, shipping, or sales. GREGOR said he read the NRC license at least 6 months ago and found it ambiguous. He believed the NRC license allowed IWI

to sell tritium night sights. He was aware of previous problems with the NRC, but did not know what those problems were. He admitted he, as president, was responsible for dealing with the NRC.

During the "shot show in Las Vegas, PULLEN told IWI he "had the best of both worlds," and it became" apparent IWI needed an alternate source of tritium. During the same "shot show," AGER approached IWI unsolicited and told them he knew of an alternative source of tritium. GREGOR said he went to South Africa in late March or early April 1995 and toured the Lumitech and Ramrod facilities. At the end of his visit, Lumitech and Ramrod told him they could supply IWI with tritium, but they did not arrive at a firm business arrangement. GREGOR said when he returned to IWI, he discussed Lumitech with P. WILSON, and they together decided to order tritium from Lumitech. He believed the first order was placed or received in June 1995, but did not know for sure because "I don't do shipping," and "I don't do purchasing" and "I don't do purchase orders even though....I sign them." He did not recall who placed the order with Lumitech and said he did not know who was responsible for purchasing tritium prior, although he signed purchase orders and may have signed purchase orders for tritium. He said he "sometimes" looked at the purchase orders he signed. He and P. WILSON were the only ones authorized to sign purchase orders.

Prior to June 1995, GREGOR said he thought tritium was tritium. After that date, he became aware that the NRC license specifically authorized the distribution of only SRB tritium. IWI hired a consultant in May or June 1995, and they wanted to amend their license regarding tritium. Prior to that time, GREGOR did not believe he had discussed South African tritium with anyone at the NRC. GREGOR said at some point, he became aware that the New Mexico license allowed only the possession of tritium from SRB, but he could not recall when he became aware of that.

GREGOR said, through CASNER, IWI supplied the NRC with information on Lumitech to amend their NRC license. He could not recall when the purchasing of South African tritium was initially raised to the NRC but said it was handled by CASNER probably in the spring or summer of 1995.

INVESTIGATOR'S NOTE: The contract between CASNER and IWI was dated June 10, 1995, and stated that was the date IWI became CASNER's client.

GREGOR said he believed IWI had received one shipment of tritium from South Africa. He said P. WILSON handled the tritium inventory and supply, saying "I don't concern myself with that." GREGOR said, to his knowledge, IWI had not sold any night sights with Lumitech or Ramrod tritium inserts or with tritium inserts from anyone other than SRB.

GREGOR said his letter to the NRC dated July 17, 1995, which said some of the South African tritium had already been matched, meant the three women in the tritium room had matched tubes of tritium for brightness and placed them on two-sided tape in pairs. After matching, the women put the tritium back into the safe which had a combination lock on it. GREGOR said P. WILSON and PEREA had the combination, and he did not believe he had the combination. He said he wrote the letter because he did not know if the Canadian and South African

tritium had been mixed together. He said IWI closed for approximately 1 week, and when P. WILSON returned from vacation, she told him the tritium from South Africa and from SRB were kept separate. He said he had not realized that because he did not have anything to do with the tritium inventory. When P. WILSON told him she was totally sure the SRB tritium was separate from the South African tritium, IWI started production again. GREGOR did not recall if P. WILSON said it had always been maintained separately or if she was able to separate it at that time. GREGOR said he did not know if all the South African tritium IWI had received was still at IWI because "I don't inventory." He said he did not know if a physical inventory was completed.

GREGOR said IWI had not sold any South African tritium and said he did not know where the red tritium inserts came from that were sold to MMC. He thought IWI sold MMC orange, but said "I don't do anything with sales." GREGOR said it was PEREA and P. WILSON's responsibility to ensure that no South African tritium was sold. He said he had never talked to the women who work in the tritium room about not selling South African tritium because "I don't deal with them." GREGOR said to him "tritium is tritium, whether it's Canadian or African. I assumed they're the same." However, he admitted he had been aware the NRC and New Mexico licenses specified SRB tritium.

#### Interview of WYRICK (Exhibit 59)

WYRICK said he did not keep track of the sales of night sights, but he recalled that IWI sold approximately 20 sets of red tritium night sights to MMC and another 10 sets of red tritium night sights at a gun show in September 1995. WYRICK could not recall when, but at some point, P. WILSON told him not to distribute the red tritium because there was a problem with it.

WYRICK said he could not tell the difference between South African and SRB tritium, once it was in the gun sight, and he would not know if the sights had SRB or Lumitech tritium in them. WYRICK said gunsights were given to him by the workers in the tritium room, and he sorted them by type of sight and distributed them. Consequently, if PEREA gave him sights containing South African tritium, they were placed with the other sights, some of which had been sold and some of which were still in inventory.

#### Interview of PEREA (Exhibit 60)

PEREA said she was the supervisor in the tritium room and was responsible for the raw tritium. She received the tritium inserts, counted them, placed them into bags of 100, and placed these bags into bags containing 1000 to 2000 tritium lights sorted by color and size. The raw South African and Canadian tritium was maintained in a safe in the tritium room. She maintained inventory sheets that combined the count for the South African and Canadian tritium. PEREA initially said they did not use the South African tritium because they still had Canadian tritium, although she admitted having tubes made up of the South African tritium. She said her latest inventory showed the red tritium count was 5051. PEREA reviewed the inventory records, and using a calculator, said the total tritium inventory count in the tritium room as of October 13, 1995, was 69,119.

PEREA said the green 250 tritium was used on front sights, and she recalled making about 400 green front sights with South African tritium and giving them to WYRICK. She said she also recalled making some sights with red tritium and giving them to WYRICK. PEREA said she did not recall being told not to use the South African tritium, and both P. WILSON and GREGOR told her it was "OK" to use the South African red tritium.

PEREA recalled that AGER brought some tritium to IWI in May 1995, and he had previously brought samples of tritium already inserted into tubes. The first supply of red tritium tubes included 721 that were "dead" because they had not been cured.

### Conclusions

Based on the evidence developed during this investigation, it is concluded that IWI, specifically GREGOR and P. WILSON, deliberately violated the conditions of IWI's NRC license by selling night sights containing tritium from an unauthorized source.

### Agent's Analysis

IWI, operating under its former President, Barry MOWRY, was the subject of two prior OI investigations, 4-93-007R and 4-93-007S. OI concluded in 4-93-007R that MOWRY deliberately violated the conditions of his NRC license by selling certain night sights unmounted and selling unmarked or improperly marked night sights which were not authorized under IWI's license. However, OI did not substantiate that the sales of unmarked or improperly marked night sights were deliberate violations of NRC regulations. OI concluded in 4-93-007S that MOWRY was continuing to sell unmounted night sights that were not authorized by the NRC license.

In October 1994, IWI changed ownership, MOWRY resigned as IWI's president, GREGOR became president, and P. WILSON later became executive vice president. K. WILSON acted as consultant to IWI. MOWRY said when he left IWI, he provided a bound book of all IWI dealings with the NRC to GREGOR and others, and both GREGOR and P. WILSON admitted being provided with this book. GREGOR said he never bothered to read this information.

In a letter from K. WILSON to the NRC dated November 28, 1994, K. WILSON requested several changes to IWI's NRC license including changing it "to an all encompassing license" and to "include other manufacturer's sights." Despite the fact that K. WILSON, P. WILSON, and GREGOR all professed an inability to understand the NRC license conditions they characterized as confusing, and they continued to sell any type of night sights, fixed or unmounted, there would have been no reason for IWI to request a change to its license if they were authorized to sell any and all night sights under the current license. This indicates they knew something was prohibitive in the license and needed to be changed before they were authorized to sell all manufacturer's sights. A letter from the NRC to K. WILSON dated January 23, 1995, stated that they could register basic models as a "series," but a device review would be required for each basic model series. In a letter from GREGOR to the NRC, GREGOR stated the new IWI fully accepted responsibility for the



former IWI's open inspection items and possible resulting enforcement action. Consequently, GREGOR was or should have been familiar with the outstanding issues regarding IWI's NRC license. On February 22, 1995, K. WILSON met with GREENE and NRC OGC representatives and was provided with a detailed description of what devices were and were not covered under the license.

In a letter from GREENE to P. WILSON, dated April 3, 1995, transmitting NRC license 30-23697-01E, GREENE stated IWI was authorized to distribute only those products specifically authorized in Condition 10, and they were required to amend their NRC license if they planned any changes contrary to license conditions. In a letter from P. WILSON to GREENE, IWI again requested to amend their NRC license to an "all encompassing license."

The correspondence between the NRC and IWI, as well as the NRC meeting with K. WILSON indicates that IWI representatives were repeatedly informed about IWI's license conditions and understood or should have understood the NRC license and the outstanding issues regarding that license. K. WILSON admits he was told the license was "narrow," but claimed he did not understand what that term meant. If they really did not understand the license, they had ample opportunity to question the NRC and to clarify their understanding of it.

After the reporting agent's initial visit to IWI in June 1995, P. WILSON said she now understood what the NRC license allowed. P. WILSON said she understood there was a difference between the nine categories of removable sights listed on IWI's NRC license and weapons where IWI mounted the sources onto the weapon. In October 1995, she reiterated that after the reporting agent's initial visit, she believed she understood the license, and IWI was currently inserting tritium into existing sights for weapons named on the November 1991 registry. She claimed GREGOR handled sales to MMC, Millett, and Heckler and Koch, and GREGOR decided which sights to sell. GREGOR said he knew IWI's license limited them to some degree, but the limiting factor was confusing. Despite this, GREGOR said IWI put tritium into "anything that came in the door"; IWI was selling night sights for all weapons, and there were no sights they did not sell, unmounted or mounted.

IWI's sales brochure, sales invoices, purchase orders, contracts, and work orders substantiated that IWI was selling night sights unmounted that were not authorized by their NRC license. Sales were made to Heckler & Koch, MMC, and Millett that were not authorized by the NRC license, as well as smaller sales to individual customers of loose night sights for shotguns, rifles, ghost rings, and other weapons that were not authorized by the NRC license. GREGOR designed and IWI manufactured a sight for S&W's Sigma gun which was never submitted to the NRC for a device review. Although GREGOR told the reporting agent about this sight in June 1995, he later denied under oath that he had designed such a sight until the reporting agent told him she had invoices showing this sight existed. P. WILSON admitted GREGOR had designed and manufactured a sight to be used on a Sigma, but she never thought about it or realized inserting tritium into that sight was a violation of IWI's NRC license.

Drawings of MMC gunsights were provided to LUBINSKI, who stated that MMC drawings did not meet the provisions of the registration dated November 13, 1991. On October 19, 1995, the reporting agent expressly told GREGOR, during a transcribed interview, that IWI's current NRC license did not authorize them to insert tritium into MMC's night sights and distribute them as loose sights. Despite this, records provided by IWI indicated that approximately 463 tritium tubes were inserted into MMC sights and sold to MMC from November 14 to December 12, 1995. In addition, MMC received 90 red tritium inserts, which could only come from South Africa, since SRB does not manufacture red tritium.

GREGOR and P. WILSON stated and the records indicate that IWI, through subcontractors, manufactured S&W type sights although IWI's license limits the manufacture of S&W sights to OEM.

CASNER, in his response to NRC's CAL, said 32 tubes of Lumitech tritium had been shipped to MMC and none of the night sights sold to MMC and Millett "contained nonapproved tritium sources or were unlicensed models." IWI officials were or should have been well aware that MMC and Millett gunsights were not authorized under IWI's NRC license for tritium insertion and distribution as loose unmounted night sights.

Although IWI received tritium from Lumitech as early as May 9, 1995, they did not receive an amended New Mexico possession license until July 24, 1995. GREGOR, P. WILSON, and K. WILSON all admit they knew they needed to amend their New Mexico license to allow possession of tritium from South Africa, yet they did not notify the NRC they had received tritium from Lumitech until the issue was specifically brought up by the reporting investigator in June 1995.

As early as February 20, 1995, Ramrod considered IWI its sole agent in the U.S. for the sale of tritium, as indicated in their letter to Arotek Ltd. IWI received no tritium from SRB after a February 15, 1995, shipment. Invoices related to the SRB purchases were provided by P. WILSON during the reporting agent's initial visit to IWI on June 8, 1995, but no mention was made by anyone at IWI that they had another source of tritium. Even when later questioned by the reporting agent, IWI stated the initial Lumitech shipment of tritium was on June 6, 1995, and this was the invoice that was provided to the NRC. During OI:RIV's visit to IWI in October 1995, OI:RIV reviewed IWI's tritium inventory forms and noted the addition of tritium inserts on May 22, 1995. PEREA, a low level employee, was then interviewed by OI:RIV and stated IWI had received some Lumitech sights in May 1995. Only then did K. WILSON locate an invoice dated May 9, 1995, from Ramrod showing the sale of 7,370 tritium inserts to IWI.

On June 30, 1995, P. WILSON told the reporting agent that IWI was "currently" working on an agreement to receive tritium from a company in South Africa, despite the fact that at that time IWI had already received two tritium shipments from that company. On that date, P. WILSON said IWI was working on an amendment request to add tritium obtained from this source to their NRC license. In a letter to the NRC dated July 7, 1995, GREGOR said IWI was in the process of changing their tritium supplier from SRB to Lumitech, but he did not tell the NRC IWI was already in possession of Lumitech tritium. On July 12, 1995, GREGOR said IWI had received some "sample" tritium inserts from

Lumitech, but no red or blue inserts. Records indicate that at the time of this conversation, IWI had received 28,000 inserts from Ramrod, including 3,000 red ones. GREGOR initially maintained no Lumitech/Ramrod tritium had been distributed, sold, or provided to anyone by IWI, but subsequently admitted it was possible some of this tritium might have been used in gunsights that had been distributed. FLOYD said on July 20, 1995, IWI told him they had "voluntarily" discontinued sales of tritium night sights because they had mixed the inserts from SRB and Lumitech together and could not tell the difference between them.

In a letter to the NRC dated July 17, 1995, GREGOR admitted some of the South African tritium could be mixed in with SRB tritium and there was no way to determine if Lumitech tritium had been inserted into gunsights and shipped, so IWI was stopping all production until the NRC approved the distribution of South African tritium. IWI did not provide the NRC with any information regarding this tritium nor did they request an amendment to their license to add Lumitech tritium to it until July 1995; although records indicate that by that time IWI, had received 56,000 Lumitech tritium inserts.

IWI received 72,750 tritium inserts from SRB from October 31, 1994, until February 15, 1995, and 56,000 inserts from Ramrod from May 9, 1995, until July 5, 1995, for a total of 128,750 inserts. IWI's tritium inventory on October 13, 1995, totalled 71,028, excluding tritium inserted into gunsights still at IWI and not yet distributed. [This figure is being used for computation purposes, although PEREA said the total tritium inventory count in the tritium room as of October 13, 1995, was 69,119 inserts.] That leaves 57,662 tritium inserts no longer in inventory, although records provided by OI:RIV under subpoena, indicate IWI sold approximately 19,299 inserts to customers from November 1, 1994, until October 31, 1995. Even assuming a zero tritium inventory prior to October 31, 1994, which is highly unlikely, approximately 38,363 tritium inserts are unaccounted for unless they were still in IWI's facility and had not yet been distributed. Additionally, although it is impossible to obtain an exact count of the inventory, according to IWI's inventory sheets, they ran out of SRB green 250 loose tritium on May 25 [1995]. A total of 5,000 green 250 tritium inserts were received from Lumitech on May 23, 1995, and placed into inventory. The inventory for these South African inserts continued to decline throughout the months, leading to the conclusion that these inserts were being used in gunsights. The green 250 inserts are used for the front sights. Only 3 of 16 random work orders, obtained from IWI during OI:RIV's visit in June 1995, were provided by IWI in response to the subpoena. That, coupled with the discrepancy in inventory records, indicates that IWI never fully complied with OI's subpoena for all sales records from November 1, 1994, until November 24, 1995.

GREGOR admitted he was aware the NRC license authorized only SRB tritium inserts and had no response as to why IWI would have sold gunsights with Lumitech tritium inserts. He said on July 14, 1995, CASNER had provided the NRC with IWI's application for a new NRC license, including information on Lumitech. IWI therefore did not request a license amendment until after the reporting investigator told GREGOR the NRC was aware that IWI had received tritium from South Africa that was not authorized for distribution by their NRC license and approximately 2 months after IWI received its first shipment of tritium from Ramrod.

K. WILSON admitted he "absolutely" understood IWI's NRC license listed SRB as IWI's source of tritium inserts. K. WILSON said he did not know if IWI sold South African tritium nor had he spoken with anyone at the NRC about amending IWI's license if they changed tritium suppliers. He said CASNER handled that issue. CASNER was not hired by IWI until June 10, 1995.

P. WILSON said she was aware that SRB was named on IWI's NRC license as the authorized supplier of tritium, although IWI did purchase tritium from another source. She said GREGOR decided to purchase tritium from Ramrod in the spring of 1995. She said IWI filed an amendment request with the NRC to add South African tritium to the license in late summer or early fall 1995, but she understood they were still operating under the old license which did not authorize the distribution of tritium from any source besides SRB. P. WILSON said she was responsible for all sales of night sights by IWI, and she was unaware of any sales of South African tritium by IWI, although the inventory indicated some of the South African tritium was missing.

GREGOR said he handled gunsmithing and had no involvement with purchasing, shipping, sales, or the tritium supply and inventory. He said prior to June 1995, he did not realize IWI's NRC license only authorized the distribution of SRB tritium. GREGOR denied IWI had sold any Lumitech tritium and said he did not know where the red tritium came from that was sold to MMC, but he had nothing to do with sales to MMC. He said it was P. WILSON and PEREA's responsibility to ensure no South African tritium was sold and he never talked to the women who worked in the tritium room.

PEREA admitted she and other workers had prepared gunsights with red tritium and green 250 tritium inserts received from South Africa. WYRICK said when he received sights for distribution, he had no way of knowing if they contained SRB or Lumitech tritium. If PEREA had given him sights containing South African tritium, they would have been sold as orders came in. He recalled selling gunsights with red tritium inserts. PEREA said no one told her not to distribute South African tritium, and both P. WILSON and GREGOR told her it was all right to use this tritium.




# SUPPLEMENTAL INFORMATION

On March 19, 1996, William P. SELLERS, Esq., Senior Legal Advisor for Regulatory Enforcement, General Litigation and Legal Advice Section, Criminal Division, U.S. Department of Justice, Washington, D.C. 20001, was apprised of the results of the investigation. Mr. SELLERS advised that, in his view, the case did not warrant prosecution and rendered an oral declination.

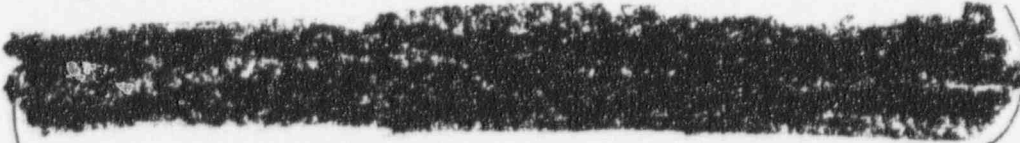
THIS PAGE LEFT BLANK INTENTIONALLY

LIST OF EXHIBITS

<u>Exhibit No.</u>	<u>Description</u>
1	Investigation Status Record, dated May 9, 1995.
2	 7C
3	Memorandum from LUBINSKI to GREENE, with Registration Number NR-365-D-101-E, dated November 13, 1991.
4	NRC License #30-23697-01E Renewal Request from MOWRY, dated June 1, 1993.
5	Letter from K. WILSON to GREENE, dated November 28, 1994.
6	Letter from FEDERLINE to K. WILSON, dated January 23, 1995.
7	Letter from GREGOR to FEDERLINE, dated February 20, 1995.
8	Memorandum from GREENE to File, dated February 22, 1995.
9	Letter from GREENE to P. WILSON, dated April 3, 1995.
10	Letter from P. WILSON to GREENE, dated May 11, 1995.
11	Letter from BROADDUS to CASNER, dated November 16, 1995.
12	IWI's Sales Brochure.
13	OI:RIV Subpoena to IWI, dated November 24, 1995.
14	OI List of IWI Sales of Night Sights.
15	Letter from OI:RIV to JACOBI, dated February 1, 1996.
16	Letter from GREGOR to OI:RIV, dated February 16, 1996.
17	Sales Records from IWI to Heckler & Koch, dated June and July 1995.
18	Sales Records from IWI to Millett, dated July and August 1995.
19	IWI Work Order 12875 to MMC, shipped July 14, 1995.
20	Memorandum from LUBINSKI to SANTIAGO, dated August 15, 1995.
21	Gunsight Drawings Provided by IWI.



- 22 Model Products, Inc., Invoice 4656, dated March 6, 1995.
- 23 IWI's New Mexico Possession License Number GS281-07, dated December 16, 1994.
- 24 New Mexico License Amendment Request from IWI, dated June 14, 1995.
- 25 IWI's Amended New Mexico Possession License Number GS281-07, dated July 24, 1995.
- 26 Facsimile from PULLEN to OI:RIV, dated June 23, 1995.
- 27 Facsimile from PULLEN to OI:RIV, dated June 27, 1995.
- 28 SRB Invoices Number SRB1260, SRB1276, SRB1341, and SRB1398, Various Dates.
- 29 Ramrod Invoices Number 1001, 1003, and 1004, Various Dates.
- 30 Facsimile From AGER to GREGOR, dated February 13, 1995.
- 31 Letter from P. WILSON to OI:RIV, dated July 5, 1995.
- 32 Letter from GREGOR to GREENE, dated July 7, 1995.
- 33 Letter from GREGOR to GREENE, dated July 17, 1995.
- 34 Conversation Record from GREENE, dated July 17, 1995.
- 35 Letter from GREGOR to GREENE, dated July 18, 1995.
- 36 Letter from CASNER to SANTIAGO, dated July 19, 1995.
- 37 Conversation Record from GREENE, dated July 21, 1995.
- 38 Memorandum from SANTIAGO to File, dated July 24, 1995.
- 39 Letter from CASNER to SANTIAGO, dated July 24, 1995.
- 40 Conversation from GREENE, dated July 25, 1995.
- 41 IWI Tritium Inventory Forms, Various Dates.
- 42 CAL from NRC to IWI, dated December 22, 1995.
- 43 Letter from CASNER to NRC, dated January 22, 1996.
- 44 Report of Interview with K. WILSON, dated June 8, 1995.
- 45 Report of Interview with P. WILSON, dated June 8, 1995.

46 Report of Interview with GREGOR, dated June 8, 1995.  
47  7C  
48  
49 Report of Interview with DODGEN, dated July 24, 1995.  
50 Report of Interview with KREISMAN, dated August 1, 1995.  
51 Transcript of Interview with K. WILSON, dated October 19, 1995.  
52 Transcript of Interview with P. WILSON, dated October 19, 1995.  
53 Transcript of Interview with GREGOR, dated October 19, 1995.  
54 Memorandum of Conversation with PULLEN, dated June 23, 1995.  
55 Memorandum of Conversation with P. WILSON, dated June 30, 1995.  
56 Memorandum of Conversation with GREGOR, dated July 13, 1995.  
57 Memorandum of Conversation with FLOYD, dated July 17, 1995.  
58 Memorandum of Conversation with FLOYD, dated July 24, 1995.  
59 Report of Interview with WYRICK, dated October 20, 1995.  
60 Report of Interview with PEREA, dated October 20, 1995.