



**IMS Systems, Inc.**

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June 16, 2020

Peter J. Habighorst, Chief  
Export Controls and Nonproliferation Branch  
Office of International Programs  
US Nuclear Regulatory Commission  
Washington, DC 20555-0001

Subject: Reply to a Notice of Violation (EA 20-064)

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Dear Mr. Habighorst,  
we have received your letter dated June 11, 2020 notifying us of a violation.  
In response to your letter, we would like to provide you with a statement and a corrective action plan.

- (1) The reason for the violation was a miscommunication between IMS Systems Inc and our shipping company Alara in regards to the 7-day Notification form 830. Each had assumed the other party had filed the notification.
- (2) As corrective steps we have taken, we have
  - a. modified our QA/QC program to reflect the requirement of filing the form 830 within the designated time limits
  - b. amended the internal checklist for source shipments to reflect the need to file the 830 form within the designated time limits
  - c. amended the internal checklist for source shipments to make it mandatory to inform the future possessor (customer of IMS) by providing a copy of the completed 830 form to them and the date it was filed with NRC
- (3) all required steps have been taken and implemented
- (4) the effective date of all corrective steps was May 21, 2020

Hopefully this addresses all concerns you might have. Please let us know if you require any additional information.

Chris Lackinger  
CEO  
IMS Systems Inc.