

## Tomas Herrera

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**From:** Michele Burgess  
**Sent:** Tuesday, December 6, 2022 8:59 AM  
**Subject:** Re: query: status of EA-21-157 ADR CO Condition 9b: EXTERNAL: Cover Letter and Confirmatory Order Cover Letter Cammenga and Associates, LLC (EA-210157))  
**Attachments:** 12022200.PDF; Company Policy Statement 2022.pdf; Memo to Resellers.pdf

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**From:** CJ Karchon - Cammenga <cj@cammenga.com>  
**Sent:** Friday, December 2, 2022 3:25 PM  
**To:** Michele Burgess <Michele.Burgess@nrc.gov>; Kevin G. Desharnais <KDesharnais@dickinson-wright.com>  
**Subject:** [External\_Sender] Re: query: status of EA-21-157 ADR CO Condition 9b: EXTERNAL: Cover Letter and Confirmatory Order Cover Letter Cammenga and Associates, LLC (EA-210157))

Hi Michele,

I hope you had a nice Thanksgiving! Thanks for following up on this. I'm glad you got the payment okay! Attached is the formal notification letter for 9b.

While we're here, I've also attached the internal company policy statement (1b) and the letter sent to resellers (2b). Have a great weekend!

Best,

CJ Karchon  
VP

Cammenga Company, LLC  
2011 Bailey Street  
Dearborn, MI 48124  
Office: +1 (313) 914.7160  
Fax: +1 (313) 914.7153  
Mobile: [REDACTED]  
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**From:** Michele Burgess <[Michele.Burgess@nrc.gov](mailto:Michele.Burgess@nrc.gov)>

**Date:** Friday, December 2, 2022 at 2:12 PM

**To:** Kevin G. Desharnais <[KDesharnais@dickinson-wright.com](mailto:KDesharnais@dickinson-wright.com)>, CJ Karchon - Cammenga <[cj@cammenga.com](mailto:cj@cammenga.com)>

**Subject:** query: status of EA-21-157 ADR CO Condition 9b: EXTERNAL: Cover Letter and Confirmatory Order Cover Letter Cammenga and Associates, LLC (EA-210157))

Hello,

This is to followup with you regarding Condition 9 of the ADR CO.

Condition 9a of the ADR Order was due 11/5/22, for payment of the \$5000 civil penalty. There is record in the system that the \$5000 was paid on 11/1/22.

Condition 9b of the ADR Order was due 11/20/22. ADR CO Condition 9b was due by 45 days (11/20/22) and stated that

- Cammenga shall submit to the NRC, a written statement indicating when and by what method payment was made, to the Director, Office of Enforcement, U.S. Nuclear Regulatory Commission, One white Flint North, 11555 Rockville Pike, Rockville, MD 20852-2738.

I do not have record of NRC receiving that written statement. Can you confirm whether you submitted that? If you already submitted that letter, could you please provide me the date that you submitted it, and a copy of the letter?

Thank you,  
Michele

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**From:** Kevin G. Desharnais <[KDesharnais@dickinson-wright.com](mailto:KDesharnais@dickinson-wright.com)>

**Sent:** Monday, October 10, 2022 6:02 PM

**To:** Michele Burgess <[Michele.Burgess@nrc.gov](mailto:Michele.Burgess@nrc.gov)>; CJ Karchon <[CJ@cammenga.com](mailto:CJ@cammenga.com)>

**Subject:** [External\_Sender] RE: EXTERNAL: Cover Letter and Confirmatory Order Cover Letter Cammenga and Associates, LLC (EA-210157))

Michele,

Thank you – this response confirms that I have received the documents, and I am able to open them.

Best regards,

Kevin Desharnais

**Kevin G. Desharnais** Member and Practice Group Co-Chair - Environmental, Energy & Sustainability

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**DICKINSON WRIGHT** PLLC

ARIZONA CALIFORNIA FLORIDA ILLINOIS KENTUCKY MICHIGAN NEVADA  
OHIO TENNESSEE TEXAS WASHINGTON D.C. TORONTO

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**From:** Michele Burgess <[Michele.Burgess@nrc.gov](mailto:Michele.Burgess@nrc.gov)>

**Sent:** Thursday, October 6, 2022 2:37 PM

**To:** CJ Karchon <[CJ@cammenga.com](mailto:CJ@cammenga.com)>; Kevin G. Desharnais <[KDesharnais@dickinson-wright.com](mailto:KDesharnais@dickinson-wright.com)>

**Subject:** EXTERNAL: Cover Letter and Confirmatory Order Cover Letter Cammenga and Associates, LLC (EA-210157))

**Importance:** High

Hello,

The ADR Confirmatory was issued today. The cover letter, Confirmatory Order, and Invoice are attached.

A hard copy of the documents will be mailed to you next week. The documents will be publicly available in the NRC's document system on 10/17/2022 (Agencywide Documents Access and Management System (ADAMS) ML22278A170).

Please reply to confirm that you have received this email and can open the files.

If you have any questions, please let me know.

Thank you,  
Michele



CAMMENGA & ASSOCIATES, LLC  
2011 BAILEY ST.  
DEARBORN, MI 48124  
Phone: 313.914.7160

## **Cammenga Company Policy Statement**

10-17-22

To Whom It May Concern:

Cammenga & Associates, LLC (“Cammenga”) is in the business of manufacturing high quality tools and equipment for members of law enforcement, the military, and other tactical professionals. Many of its products contain a byproduct material contained in sealed sources called tritium.

Cammenga maintains licenses with the Nuclear Regulatory Commission (“NRC”) to legally possess and distribute authorized products containing this material.

Accordingly, it is paramount all NRC regulatory and license requirements are understood and, ethically, full compliance is achieved.

Willful violations of NRC license requirements are unacceptable. Pursuant to 10 CFR 30.9 and 30.10, there are potential criminal sanctions the Department of Justice may take against individuals for deliberate misconduct.

The primacy of regulatory compliance over competing company goals is vital.

If you or any other member of the Cammenga Management Team is aware of any misconduct in this regard, it must be brought to ownership’s attention.

Best Regards,

Christopher J. Karchon

*Director*



CAMMENGA & ASSOCIATES, LLC  
2011 BAILEY ST.  
DEARBORN, MI 48124  
Phone: 313.914.7160

## Letter to Cammenga Reseller

10-17-22

To Whom It May Concern:

Cammenga & Associates, LLC (“Cammenga”) is in the business of manufacturing high quality tools and equipment for members of law enforcement, the military, and other tactical professionals. Many of its products contain a byproduct material contained in sealed sources called tritium.

Since 1992, Cammenga has maintained licenses with the Nuclear Regulatory Commission (“NRC”) to legally possess and distribute authorized products containing this material.

**Any reseller or distributor who receives products from Cammenga can rest assured they are free and clear of any regulatory requirements.**

Conversely, if a product containing tritium (or other byproduct material) is shipped by a non-licensed entity and wasn’t initially distributed to them from a licensed entity like Cammenga, then a violation has occurred.

If you or any other member of your team is aware of any violations in this regard, please bring them to our attention so we can help ensure NRC guidelines are properly followed.

Best Regards,

*CJ Karchon*

Christopher J. Karchon

*Director*