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September 28, 2000

Re: Allendale Mutual Insurance Company v. Safety Light Corporation
NRC File No. TR-00-08
Our File No. 00222-0324

VIA FAX

Charles E. Mullins, Esquire
U.S. NUCLEAR REGULATORY COMMISSION
Room #0-15D21
11555 Rockville Pike
Rockville, MD 20852

Dear Mr. Mullins:

By now you should have received our letter dated September 22, 2000, in which we commented on Suzanne Chamberlin's letter to you dated August 8, 2000, and joined in Safety Light's request that the NRC make a witness or witnesses available. Among other things, you stated that the parties will need to identify the subject areas on which they will want to have an NRC witness testify. To the extent that it is not clear from our letter of September 22, 2000, Allendale is interested in interviewing and/or taking the depositions of the NRC witnesses who are most knowledgeable about:

- The NRC's Order Modifying Licenses (Effective Immediately) and Demand for Information dated March 16, 1989, addressed to Safety Light Corporation, United States Radium Corporation, USR Industries, Inc. and others.
- NRC dealings with Safety Light Corporation and the other entities listed in the March 16, 1989 Order, subsequent to the Order in connection with the activities which Safety Light Corporation, et al., are directed to perform in the Order.
- NRC orders, directives, license conditions and the like issued prior to March 16, 1989, in which the NRC sought to compel Safety Light and/or any of the other

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entities listed in the March 16, 1989 Order to perform any or all of the activities described or referred to in the March 16, 1989 Order, or any related or similar activities.

- The amendment of License No. 37-00030-02 in August, 1969, and all subsequent dealings of the NRC with United States Radium Corporation, Safety Light Corporation and/or any of the other entities listed in the March 16, 1989 Order in connection with that License.

As we have advised you, the discovery deadline in this case is January 15, 2001. The NRC's prompt response to Allendale's request for identification and production of witnesses who can testify as to these matters will be appreciated.

Very truly yours,

HECKER BROWN SHERRY AND JOHNSON

BY: William H. Black, Jr.
William H. Black, Jr.

WHB/rlb

cc: Suzanne Q. Chamberlin, Esquire
(Via Fax)

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