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File No. 0008-01

December 22, 2000

VIA TELECOPY

Brad Fewell, Esq.
United States Nuclear Regulatory Commission
Region 1
475 Allendale Road
King of Prussia, Pa 19406-1415

030-05980
37-00030-02

Re: Safety Light Corporation
Use of Trust Funds/Insurance Proceeds
Remediation of Bloomsburg, Pa. Property

Dear Mr. Fewell:

As your office is aware, our client, Safety Light Corporation ("Safety Light"), is currently engaged in various decommissioning and decontamination activities at the Bloomsburg property which have been undertaken to comply with USNRC directives and licensing requirements. Unanticipated problems associated with those activities make it necessary to raise the following issue for your immediate consideration.

Safety Light contracted with OHM, now IT Corporation, to remove two underground silos and their radioactive contents from the property and to prepare all resultant waste for disposal at a licensed facility. Thus far, Safety Light has paid IT Corporation approximately \$580,000 for remediation of the silos. Those costs were incurred on a time and materials basis, and exceeded original estimates provided to Safety Light when it originally contracted with OHM.

We understand the general reluctance of USNRC to involve itself in private party disputes. Nevertheless, financial considerations compel us to inform you that we have been advised by IT Corporation that additional waste characterization and re-sorting activities will be required to allow for most, but not all, of the waste to be disposed of at a licensed facility. Regardless of whether this is accurate, and we believe it is, Safety Light disagrees with the position of IT Corporation that it is entitled to an **additional \$360,000** to complete these activities. Our client is prepared to take whatever steps are necessary to compel IT Corporation to fulfill what we believe to be are its contractual obligations to Safety Light.

NMSS/RGN MATERIALS-002

Robertson, Freilich, Bruno & Cohen
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In the meantime, our client has been placed under significant pressure to dispose of the silo waste. The only way Safety Light can accomplish this task, short of obtaining the agreement of IT Corporation to perform the aforementioned additional work free of cost, is for our client to contract with and pay another company to perform that work. We have been presented with an estimate by GTS Duratek of ~\$400,000 to prepare the waste at issue for off-site disposal.

We write this letter to ask for the approval of USNRC to allow Safety Light the use of additional trust fund moneys to complete the silo remediation project. Our only other alternative is to pursue IT Corporation in court, a task that will likely last well into next year.

Please contact me immediately so that we can discuss this request in further detail. Thank you for your consideration and best regards for the Holiday.

Very truly yours,



KEVIN J. BRUNO

KJB