

Michael A. Martin, Esq. pc

633 Washington Road, Pittsburgh, Pennsylvania 15228-1978

telephone 412/561-1996
facsimile 412/561-1998

November 9, 2001

BY TELECOPY ONLY

Carol Ann Reed, FOIA/PA Officer
U.S. Nuclear Regulatory Commission
Washington, DC 20555

FOIA/PA REQUEST

Case No: 2002-0046
Date Rec'd: 11-13-01
Action Off: Prof. Brown
Related Cases: _____

RE: Freedom of Information Act Request
Reese v. A-Best Products, No. 2001-3293
Court of Common Pleas, Cambria County, Pennsylvania

Dear Ms. Reed:

We represent Kaiser Aluminum & Chemical Corporation, one of the defendants in the above-captioned lawsuit. I am writing in follow-up to my telephone conversation with you this afternoon, Friday, November 9, 2001. Pursuant to the Freedom of Information Act, and in connection with the above referenced litigation, we request the following Atomic Energy Commission ("AEC") and Nuclear Regulatory Commission ("NRC") documents generated in connection with the possession and use of nuclear materials and special nuclear materials by Bethlehem Steel Corporation at its facilities in Johnstown, Cambria County, Pennsylvania:

all letters and supporting documents submitted by Bethlehem Steel to the AEC/NRC to apply for, renew, and amend licenses for *Bethlehem Steel, as licensee*, to possess and use radioactive materials, and/or special nuclear materials in Johnstown, Pennsylvania;

all licenses, including amendments and renewals, issued by the AEC/NRC to *Bethlehem Steel, as licensee*, authorizing the possession and use of radioactive materials, and/or special nuclear materials in Johnstown, Pennsylvania;

all letters and supporting documents submitted by Bethlehem Steel to the AEC/NRC for permission to take possession of, and use nuclear materials and/or special nuclear materials, *under general license*, at its facilities in Johnstown, Pennsylvania;

all general licenses, including amendments and renewals, issued by the AEC/NRC, under which Bethlehem Steel possessed and used nuclear materials, and/or special nuclear materials, at its facilities in Johnstown, Pennsylvania;

all records of inspections by the AEC/NRC of Bethlehem Steel facilities in Johnstown, PA; and,

all records relating to AEC or NRC violations identified at Bethlehem Steel facilities in Johnstown, Pennsylvania.

Should you need to speak with at any time in connection with this request, please telephone me at 207-772-5808. Thank you for your assistance in this matter.

Very truly yours,

Therese MacDonald
Therese MacDonald
Legal Assistant