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File No. 0008-0002

November 13, 2001

**VIA FEDERAL EXPRESS**

Ronald Bellamy, Chief  
Decommissioning and Laboratory Branch  
United States Nuclear Regulatory Commission  
Region 1  
475 Allendale Road  
King of Prussia, PA 19406-1415

37-00030-02  
030-05980

Re: Safety Light Corporation  
Establishment of Second Trust/Escrow Fund

Dear Mr. Bellamy:

We represent Safety Light Corporation ("Safety Light") with respect to the above-referenced matter. We write in response to your October 9, 2001 letter to William Lynch regarding the establishment of a second NRC-Administered Trust/Escrow Fund with the settlement proceeds from Allendale Insurance Company. We have reviewed the NRC guidance documents you provided, however, since this Trust/Escrow Fund is being established pursuant to the 1994 settlement agreement rather than a typical decommissioning, these forms and instructions do not appear to be appropriate. Subject to your comments otherwise, we intend to follow the format used in establishing the original Trust/Escrow Fund, which makes specific reference to the Settlement Agreement, as that format seems more akin to our purposes.

As counsel to Safety Light, we believed it best to contact Regional Counsel, Brad Fewell, Esq., about this matter. Mr. Fewell agrees with our approach. We also advised him of our efforts to complete the establishment of the Trust/Escrow Fund in the proper format. While it is unlikely that we will be able to provide you with the required documentation by November 16, 2001, we will work to ensure that you receive such documentation as soon as possible.

Finally, in your October 9, 2001 letter you also requested information regarding the status of the remediation of the Maxey Flats site. Please be advised that we have contacted our colleagues in that matter and are working to provide you with a status report as soon as possible.

NMSS/RGNI MATERIALS-002

ROBERTSON, FREILICH, BRUNO & COHEN, LLC  
Counsellors At Law

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If you have questions regarding our efforts to establish this second Trust/Escrow Fund or to obtain information regarding the remediation of the Maxey Flats site, please do not hesitate to contact me.

Very truly yours,  
ROBERTSON, FREILICH, BRUNO & COHEN, LLC

By: Kerry Ann McArdle  
Kerry Ann McArdle, Esq.

KAM

cc: Brad Fewell, Esq.