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January 18, 2006

**VIA FACSIMILE 301-415-1101**

Secretary, U.S. Nuclear Regulatory Commission  
Attn: Rulemakings and Adjudication Staff  
Washington, DC 20555

***Subject: Order (Effecting Immediately) Prohibiting Involvement in NCR-Licensed Activities (NRC Special Inspection Report NO 50-346/2002-08 (DRS) (NCR Investigation Report NO. 3-2002-006)***

The purpose of this communication is to respond to your directive of January 4, 2006, to my client, Prasoon Goyal, to desist in any and all NRC licensed activities for a period of one (1) year. This suspension was based on Mr. Goyal's activities as a senior engineer at FENOC nuclear power plant, Davis-Beesse, near Cleveland, Ohio in 2001-2002.

Mr. Goyal herein denies any and all deliberate wrongdoing on his part in the above incident. Goyal wishes to file a complete answer to the specifications contained in your January 4, 2006 letter prepared by Martin Virgilio, Deputy Executive Director for Materials Research, State, and Compliance Programs Office of the Executive Director for Operations.

Per that letter, Mr. Goyal has until January 24, 2006, to answer and demand a hearing. Goyal, through counsel requests an extension in the above provisions. His reasons for this are as follows:

- A) The charges against Mr. Goyal are extremely technical and complex. They require hundreds of complicated matters and will require the employment of a professional expert in the fields of nuclear power, engineering and the exact meaning of correspondence among the parties. Counsel is unprepared without a significant extension to be able to provide effective representation.
- B) The consequences of a decision by the government and its various sub-agencies will have long-term effect on Mr. Goyal's career, especially as much as he is a sixty-one (61) year old American citizen who is most skilled as an engineer in the nuclear field.

C) Counsel is temporally physically incapacitated from any work which requires, travel or considerable movement. On December 16, 2005, counsel was admitted to Bon Secour Hospital in Grosse Pointe, Michigan with a diagnosis of a fractured pelvis. Counsel's treating physician is Dr. Stephen Hoerler (313) 417-6100. After a four (4) day hospitalization, counsel was returned home and is under bed rest and home confinement. Complete recovery is not expected before March 16, 2006. At that time counsel will be faced with preparing this case and many others. Counsel is a sole-practioner in his practice.

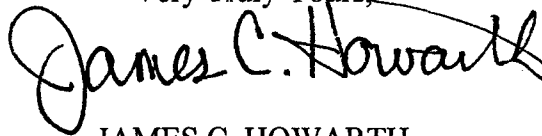
For all of the above reasons, counsel seeks a six (6) month continuance in this matter, thus requiring an answer by or before July 6, 2006.

If it not already clear, Mr. Goyal, through counsel requests a formal hearing on the above charges. Any inquires for further clarification should be made to counsel at home:

936 Trombley Rd.  
Grosse Pointe Park, MI 48230  
(313) 822-3862 (Home)  
(313) 590-1670 (Cell)


Thank you, in advance for your consideration.

Very Truly Yours,



JAMES C. HOWARTH

Subscribed and sworn to before me  
this 18 day of January, 2006.



NOTARY PUBLIC, OAKLAND COUNTY, MI  
MY COMMISSION EXPIRES: 11/4/2011

JCH/jml

cc: Director, Office of Enforcement  
US Regulatory Commission  
Washington, DC 20555

US Nuclear Regulatory Commission  
Washington, DC  
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Prasoon Goyal