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May 15, 1989

**VIA TELECOPIER**

Jay Gutierrez, Esquire  
Regional Counsel  
Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, Pennsylvania 19406

RE: In the Matter of  
Neutron Products, Inc.

Dear Mr. Gutierrez:

Pursuant to 10 C.F.R. 9-200, I hereby request that John McGrath, John White and Ronald Nimitz be granted permission to testify in a hearing before the Maryland Department of the Environment which is scheduled to be held from June 6, 1989 through June 9, 1989 in the above-captioned matter.

This hearing concerns an appeal from a March 3, 1989 amendment to Radioactive Material License No. MD-31-025-01 held by Neutron Products, Inc. ("NPI") of Dickerson, Maryland. This amendment acted to suspend all operations involving the firm's manufacture of Cobalt-60 sources. The Department undertook this action in response to a series of contaminations and systemic deficiencies existing at the facility. The State intends to call Messrs. McGrath, White and Nimitz as witnesses to testify concerning the following:

1. Their knowledge of all deficiencies which have existed and which currently exist at NPI relating to the license in question;
2. Their opinions concerning the health threat posed by such deficiencies, including their knowledge, of the "hot particle" problem as it existed or may exist at NPI.
3. Observations and results of any tests conducted at NPI from May, 1987 to the present including but not

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limited to inspections conducted at the facility on  
March 13 and 14, 1989.

Please contact me if you have any questions. Thank you  
for your cooperation in this matter.

Sincerely,

*Maura I. McInerney*  
Maura I. McInerney  
Staff Attorney

PDM/rs