



serve upon the party submitting the request a written response within 30 days after the service of the request.

DEFINITIONS AND INSTRUCTIONS

- A. These interrogatories are continuing in character until the date of the hearing, and are required to supplement your answers as additional information becomes known or available to you.
- B. Unless otherwise indicated, these interrogatories refer to the time, place and circumstances of the occurrences mentioned or complained of in the February 24, 1999 Order against Mr. Isakoff (hereafter February 24<sup>th</sup> Order).
- C. Throughout these interrogatories, the plural shall include the singular and the singular shall include the plural.
- D. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives, spouse and family and, unless privileged, his attorneys.
- E. The pronoun "you" refers to the party to whom these interrogatories are addressed and the persons mentioned in Paragraph D above.
- F. If an act, event, transaction, occasion, instance, matter, course of conduct, course of action, person or writing is mentioned in response to more than one of these interrogatories, appellant need not completely identify and describe it, him or her in every instance, provided appellant supplies a complete identification in one such instance, and in each other instance

- G. makes a specific reference to the place paragraph and page number in the answers to these interrogatories where it, he or she is fully identified and described.
- H. “Identify,” “identifying,” and “identification” when referring to a natural person mean to provide an identification sufficient to notice a deposition of such person and to serve such person with process to require his or her attendance at a place of examination and shall include without limitation his or her full name, present or last known address, present or last known business affiliation, home and business telephone number, title or occupation and each of his or her positions during the applicable period of time covered by any answer referring to such person.
- I. Provide the following information in chronological order with respect to each oral communication which is the subject matter in part or in whole of any of these interrogatories:
1. Who was present;
  2. The date thereof;
  3. Where the same occurred, *e.g.* if in direct person-to-person conversation, the place from which each person involved actually participated; and
  4. What was said by each person involved during such conversation and the order in which it was said, identifying what was said with the person speaking.
- J. The term “person” as used herein means, in the plural as well as the singular, any natural person, firm, association, partnership, corporation, or other form of legal entity, unless the context indicates otherwise.

- K. If any matter responsive to any of the following interrogatories is being withheld based on any claim of privilege, describe generally the matter withheld, state the privilege being relied upon and identify all persons who have had access to said matter.
- L. The term “present time” as used herein means the date on which these interrogatories were served on you.
- M. The term “document” as used herein shall mean any written matter, whether produced, reproduced or stored on paper, cards, tapes, disks, belts, charts, film, computer storage devices or any other medium and shall include, without limitation, matter in the form of books, reports, studies, statements, speeches, notebooks, agreements, appointment calendars, working papers, manuals, memoranda, notes, procedures, orders, instructions, directions, training materials, records, correspondence, diaries, plans, diagrams, drawings, periodicals, lists, telephone logs, minutes, photographs and any published materials.

#### INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS

##### INTERROGATORY 1

Identify any person known to Mr. Isakoff to have information concerning the issues and/or facts contained in the February 24<sup>th</sup> Order against Mr. Isakoff.

##### INTERROGATORY 2

Identify any persons known to Mr. Isakoff to have information supporting his denials of actions described in the February 24<sup>th</sup> Order and provide brief statements describing that information.

INTERROGATORY 3

With respect to any person listed in response to Interrogatories 1 or 2 whom Mr. Isakoff is considering calling as a witness in this proceeding, set forth the subject matter and facts to which that person will testify.

INTERROGATORY 4

Identify and provide copies of each document known to Mr. Isakoff to support his position in this proceeding.

INTERROGATORY 5

As to each document listed in response to Interrogatory 4, state whether or not Mr. Isakoff intends to seek to move each such document into the record as evidence in the proceeding pursuant to 10 C.F.R. § 2.743.

INTERROGATORY 6

As to each document listed in response to Interrogatory 4, state what fact or opinion Mr. Isakoff intends to establish if the document is admitted into evidence.

INTERROGATORY 7

Mr. Isakoff has denied that he failed to perform the weekly wipe test for the week ending September 28, 1996. Please provide all information that Mr. Isakoff relies upon to support his denial.

INTERROGATORY 8

Mr. Isakoff has denied that he ever deliberately falsified weekly wipe test survey records. Please provide all information that Mr. Isakoff relies upon to support his denial.

INTERROGATORY 9

Mr. Isakoff has denied that he deliberately created a bar phantom test record falsely dated September 28, 1996. Please provide all information that Mr. Isakoff relies upon to support his denial.

INTERROGATORY 10

Mr. Isakoff has denied that he willfully recorded inaccurate information pertaining to dose administration on numerous dose dispensing form (DDF) records. Please provide all information that Mr. Isakoff relies upon to support his denial.

INTERROGATORY 11

Pursuant to Interrogatory 10, please state whether Mr. Isakoff also denies that he willfully failed to record the assayed dose at all on multiple DDFs, a conclusion made by the NRC staff in its February 24<sup>th</sup> Order.

INTERROGATORY 12

During the telephonic prehearing conference in this proceeding held on April 14, 1999, counsel for Mr. Isakoff stated that this case arose out of political infighting at Temple University Hospital during the time of the events at issue in the February 24<sup>th</sup> Order. Please identify all individuals involved in this infighting. Please also provide the subject of this infighting, the period of time when it took place, when and if it ended and, if it ended, the reasons why.

INTERROGATORY 13

During the April 14<sup>th</sup> telephonic prehearing conference, counsel for Mr. Isakoff stated that his client may employ the services of an expert witness in this proceeding. Please identify any such

witness, and provide curricula vitae for each such individual. Please also provide a statement of the subject matter about which each witness will testify and its relevance to the issues involved in this proceeding.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "L. Michael Rafky", written over a horizontal line.

L. Michael Rafky  
Counsel for NRC Staff

Dated at Rockville, Maryland  
this 20<sup>th</sup> day of April 1999

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
07/20

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '99 APR 21 A 9:53

In the Matter of )  
 )  
GARY ISAKOFF ) IA 98-006  
 )  
 )

07/20  
AD

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S FIRST SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS" in the above-captioned proceeding have been served on the following through deposit in the Nuclear Regulatory Commission's internal mail system, or by deposit in the United States mail, first class, as indicated by an asterisk, this 20<sup>th</sup> day of April 1999.

Administrative Judge  
Charles Bechhoefer  
Atomic Safety and Licensing Board  
Mail Stop T-3F23  
Washington, D.C. 20555

Administrative Judge  
Richard F. Cole  
Atomic Safety and Licensing Board  
Mail Stop T-3F23  
Washington, D.C. 20555

Adjudicatory File (2)  
Atomic Safety and Licensing Board  
Mail Stop: T-3F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge  
Charles N. Kelber  
Atomic Safety and Licensing Board  
Mail Stop T-3F23  
Washington, D.C. 20555

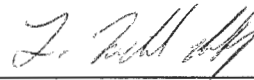
Office of the Secretary (2)  
ATTN: Rulemaking and  
Adjudications Staff  
Mail Stop: O-16G15  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Office of Commission Appellate  
Adjudication  
Mail Stop: O-16G15  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Atomic Safety and Licensing Board Panel  
Mail Stop: T-3F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

John F. O'Riordan, Esq.\*  
Connolly Epstein Chicco Foxman  
Oxholm & Ewing  
1515 Market Street  
Ninth Floor  
Philadelphia, PA 19102-1909



---

L. Michael Rafky  
Counsel for NRC Staff