

RELATED CORRESPONDENCE

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'98 MAR -2 P3:43

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

In the Matter of)	
)	Docket No. 30-31373-CivP
CONAM INSPECTION, INC.)	
)	
(Order Imposing Civil Monetary Penalty))	ASLBP No. 98-735-01-CivP

REQUEST FOR PRODUCTION OF DOCUMENTS

Pursuant to 10 C.F.R. § 2.744(a), Conam Inspection, Inc. requests production of the following documents by the NRC Staff.

INSTRUCTIONS

For purposes of this Request, "documents" means "documents" as defined in Fed. R. Civ. P. 34(a).

1. All documents relating to OI Investigation No. 3-96-014.
2. All documents relating to submissions by licensees to the NRC which propose to use and/or seek NRC approval for use of external weighting factors for human radiological exposure determinations based upon ICRP Publication No. 26.
3. All documents which relate to any action taken by the NRC on any submission to the NRC by a licensee which proposes use of external weighting factors for human radiological exposure determination based upon ICRP Publication No. 26.
4. All documents which relate to any action taken by the NRC on any submission to the NRC by a licensee which proposes use of external weighting factors for human radiological

SECY-EHD-002

DS03
18836

U.S. NUCLEAR REGULATORY COMMISSION
RULEMAKINGS & ADJUDICATIONS STAFF
OFFICE OF THE SECRETARY
OF THE COMMISSION

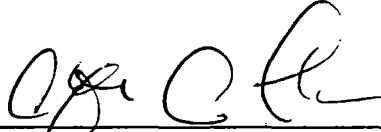
Document Statistics

Postmark Date 2/26/98
Copies Received 2
Add'l Copies Reproduced 1
Special Distribution OGC, RIDS

exposure determination based upon any radiation dose assessment protocol other than ICRP
Publication No. 26.

The documents requested in Request No. 1 are relevant to this proceeding because they relate to facts upon which the NRC has concluded that Conam has willfully violated NRC regulations, as charged in this proceeding. The documents requested in Requests Nos. 2, 3, and 4 are relevant to this proceeding because they relate to the NRC's contention that radiation dose determination under 10 C.F.R. § 20.1201 may not be assessed in accordance with ICRP Publication No. 26 in the absence of prior NRC approval of an assessment protocol based on that publication.

CONAM INSPECTION, INC.



One of Its Attorneys

Dated: February 26, 1998

Clifton A. Lake
McBride Baker & Coles
500 West Madison, 40th Fl.
Chicago, IL 60661-2511
(312) 715-5700
216661

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'98 MAR -2 P 3:43

In the Matter of)	OFFICE OF SECRETARY
)	Docket No. 98-31373-CivP AND
CONAM INSPECTION, INC.)	ADJUDICATIONS STAFF
)	
(Order Imposing Civil Monetary Penalty))	ASLBP No. 98-735-01-CivP

CERTIFICATE OF SERVICE

I hereby certify that copies of **REQUEST FOR PRODUCTION OF DOCUMENTS** in the above-captioned proceeding have been served on the following by deposit in the United States Mail, First Class, (also via fax and e-mail where indicated) this 26th day of February, 1998.

Charles Bechhoefer, Chairman
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
e-mail: cxb2@nrc.gov

Charles A. Barth
U.S. Nuclear Regulatory Commission
Office of the General Counsel
Washington, D.C. 20555
e-mail: cab@nrc.gov

Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Fax: (301) 415-5599

Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, Illinois 60532

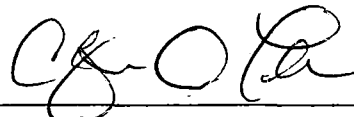
Dr. Charles N. Kelber
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Fax: (301) 415-5599

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

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

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

Secretary (2)
Attn: Rulemakings and Adjudications Staff
Mail Stop: O-16 G15
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Clifton A. Lake
Counsel for Conam Inspection, Inc.

Dated: February 26, 1998