

RELATED CORRESPONDENCE

DOCKETED
USNRC
May 29, 1998

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

NRC STAFF REQUESTS FOR ADMISSIONS
BY ARNIE MOREL
AN EMPLOYEE OF CONAM INSPECTION, INC.

The NRC Staff requests, pursuant to 10 C.F.R. § 2.742, that Arnie Morel, an employee of Conan Inspection, Inc., within ten days of service, admit or deny the truth of the following statements under oath or affirmation or provide a sworn statement setting forth in detail the reasons why he can neither truthfully admit nor deny them. These Requests concern authentication of Conan Inspection Exhibits two and three, color photographs, introduced at the deposition of William Chastain on May 12, 1998, in Lisle, Illinois. As last known, they were in the possession of Conan's counsel on May 13, 1998, at the deposition of Robert Slack.

ADMISSION NUMBER 1

Arnie Morel was employed by Conan Inspection, Inc. during February 1996.

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19148

ADMISSION NUMBER 2

On February 27, 1996, Arnie Morel was working at an Eli Lilly building in Indianapolis, Indiana.

ADMISSION NUMBER 3

William Chastain informed Arnie Morel on February 27, 1996, that he thought he had been overexposed to radiation, or words to that effect.

ADMISSION NUMBER 4

Before leaving the Eli Lilly property on February 27, 1996, Arnie Morel took pictures of the inside of the room where Mr. Chastain thought he had been overexposed to radiation.

ADMISSION NUMBER 5

Arnie Morel made no changes to the placement or location of the ladder Mr. Chastain had been using prior to taking pictures.

ADMISSION NUMBER 6

Arnie Morel made no changes to the placement or location of the Amersham 600B camera that Mr. Chastain had been using prior to taking pictures.

ADMISSION NUMBER 7

Conan Exhibits number two and three introduced by counsel for Conan at the deposition of William Chastain taken on May 12, 1998 are prints of pictures taken by

Arnie Morel on February 27, 1996, in the room where Mr. Chastain thought he had been overexposed to radiation.


ADMISSION NUMBER 8

The two pictures which are Conan Exhibits two and three are a fair and accurate depiction of the room where Mr. Chastain thought he had been overexposed to radiation.

ADMISSION NUMBER 9

The two pictures which are Conan Exhibits two and three fairly represent what Arnie Morel saw in the room where Mr. Chastain was working when he thought he had been overexposed to radiation.

Respectfully submitted,


Charles A. Barth
Counsel for NRC Staff

Dated in Rockville, Maryland
this 29th day of May 1998

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'98 JUN -1 A9:00

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

In the Matter of)	
)	Docket No. 30-31373-CivP
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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF REQUESTS FOR ADMISSIONS BY ARNIE MORELAN EMPLOYEE OF CONAM INSPECTION, INC." in the above-captioned proceedings have been served on the following by deposit in the United States mail, first class; or as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system this 29th day of May 1998.

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Administrative Judge
Atomic Safety and Licensing Board
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U.S. Nuclear Regulatory Commission
Washington, D. C. 20555
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Adjudicatory File* (2)
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Secretary* (2)
Attn: Rulemakings and
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Charles A. Barth
Counsel for NRC Staff