

RELATED CORRESPONDENCE

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001



OFFICE OF THE
GENERAL COUNSEL

June 11, 1998

DOCKETED
USNRC

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OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

U.S. REGISTERED MAIL

Malcolm H. Brooks, Esq
McBride Baker & Coles
500 West Madison Street
40th Floor
Chicago, Illinois 60661

In the Matter of
Conam Inspection, Inc
Itasca, Illinois (License No. 12-16559-01)
(Order Imposing Civil Monetary Penalty)
Docket No. 30-31373-CivP

Dear Mr. Brooks:

Enclosed is a subpoena for two photographs which you introduced as Conam Exhibits one and two at the recent depositions. These pictures were promised to Mr. Dambly and myself in at least an 8 X 10 format by Wednesday, May 13, 1998. As of today, we do not have them. The subpoena also includes the other pictures taken by Mr. Morel at that time and the film so that we can reproduce with greater resolution the pictures of the site of the radiation incident.

Sincerely,

A handwritten signature in cursive script that reads "Charles A. Barth".

Charles A. Barth
Counsel for NRC Staff

Enclosure: As stated

cc w/out encl: Service list

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
SUBPOENA DUCES TECUMM

In the matter of:

Conam Inspection, Inc.
(License No. 12-16559-01
Itasca, Illinois, 60143.
(Order Imposing Civil Monetary Penalty)
Docket No. 30-31371-Civ.P.



TO: Conam Inspection, Inc.
1245 W. Norwood
Itasca, Illinois 60143

YOU ARE HEREBY COMMANDED to produce on or before June 24, 1998 for examination and copying by the UNITED STATES NUCLEAR REGULATORY COMMISSION two color photographs , said photographs being identified as Conan Exhibits number two and three introduced (Deposition page 73) by Conan's counsel during the deposition of William Chastain taken on Tuesday, May 12, 1998 at the offices of the Nuclear Regulatory Commission in Lisle, Illinois, and all other photographs taken by Arnie Morel on February 27, 1996 at Eli Lilly and Company, Indianapolis, Indiana, and the film from which those pictures were made.

BY ORDER OF THE ATOMIC SAFETY AND LICENSING BOARD PANEL

Charles Bechhoefer

CHARLES BECHHOEFER, CHAIRMAN
JUNE 10, 1998

ATTORNEY FOR USNRC
Charles A Barth