

RELATED CORRESPONDENCE

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



OFFICE OF THE  
GENERAL COUNSEL

June 11, 1998

DOCKETED  
USNRC

'98 JUN 11 P2:45

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