

Radiation Technology, Inc.

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April 30, 1979

Mr. Richard S. Salzman, Chairman
Atomic Safety and Licensing Appeal Board
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

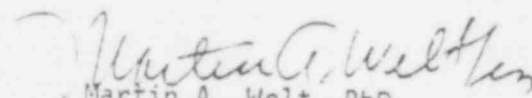
RE: BML #29-13613-02 - Radiation Technology, Inc.



Dear Mr. Salzman:

We hereby request a postponement in the date previously set for filing our rebuttal brief to the Staff's brief opposing licensee exceptions to the initial decision. We wish to point out that the sheer volume of the Staff's brief which is in excess of the 70-page maximum set for rebuttal briefs of this type will require far more time than had been originally anticipated in order to properly review the hearing transcript so as to rebut the statements made by the Staff which are, in our opinion, most misleading. We believe that sufficient justification exists for a time extension in light of the fact that the staff has seen fit to submit a brief in excess of the required page limit and further, we wish to point out that the staff has utilized three attorneys in compiling this brief which adds to a previous attorney Karen Cyr, who participated in all of the early work on this matter and then asked to be relieved while the defendant, namely Radiation Technology, Inc. is still operating in the person of Dr. Martin A. Welt, its president, pro se, for the defense. Perhaps the NRC would loan us an attorney or two since they seem to have so many and we would be able to draft a very prompt reply. We also believe that the hearing transcript speaks for itself, we do believe that it would be a disservice to our company not to point out certain of the transcript citations which so clearly rebut the staff rebuttal. We therefore request a postponement in submitting our rebuttal until July 16, 1979. If our time delay cannot be approved, then we must protest the staff rebuttal as being in excess of the 70-page limit required for rebuttal briefs.

Very truly yours,


Martin A. Welt, PhD.
President

MAW:men

cc: Dr. Lawrence Quarles
Mr. Michael C. Farrar

Hon. Samuel W. Jensch
James Lieberman, Esq.

Docketing & Service Sect.
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RADIATION RESEARCH & PROCESSING FOR INDUSTRY SINCE 1966

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