

DCS

# SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

2300 N STRLET, N. W.  
WASHINGTON, D. C. 20037

TELEX/CABLE  
69-2693 (SHAWLAW WSH)  
—  
TELEPHONE  
(202) 663-8032

VIRGINIA OFFICE  
1501 FARM CREDIT DRIVE  
MCLEAN, VIRGINIA 22102  
(703) 790-7900  
—  
TELECOPIER  
(202) 223-3760 & 223-3761

GERALD CHARNOFF, P.C.

Mr. James Lieberman  
Director  
Office of Enforcement  
United States Nuclear  
Regulatory Commission  
Washington, D.C. 20555

*OCTOBER 5, 1989*

Dear Mr. Lieberman:

The firm of Shaw, Pittman, Potts & Trowbridge has been retained to represent USR Industries, Inc.; USR Lighting, Inc.; USR Chemicals, Inc.; USR Metals, Inc. and U.S. Natural Resources, Inc. in the matter of Safety Light Corp., et al., Docket Nos. 030-05980, 05981, 05982, 08336 and 08444.

In view of the complexity of the issues involved and the large number of documents which are material and relevant to those issues, we request a reasonable extension of time to develop a response to the Commission's August 21, 1989 Order in this matter. Such extensions have been traditionally and customarily granted in the past as a matter of basic fairness when new counsel is retained. Under the circumstances, we believe that a period of thirty days would be a reasonable extension.

Very truly yours,

*Gerald Charnoff*  
Gerald Charnoff  
*Howard K. Shapar*  
Howard K. Shapar

cc: Mr. Ralph T. McElvenny, Jr.  
Mr. William T. Russell  
Mr. John T. Miller  
D. Jane Drennan, Esq.

*IE 33*

8910190160 891005  
NMSS LIC30  
37-00030-02 PDC