UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of:

SAFETY LIGHT CORPORATION, et al.

		90
)))))	DOCKET NOS.	030-05980 F, LE 030-05981 030-05892 030-08335 030-08444
))))))	LICENSE NOS.	37-00030-02 37-00030-08 37-00030-07E 37-00030-09G 37-00030-10G

MOTION OF SAFETY LIGHT CORPORATION TO DEFER THE PREHEARING CONFERENCE

Pursuant to the Letter Order granting the Motion for an Extension of Time dated September 12, 1989, Safety Light Corporation ("Safety Light") hereby files its Request for a Hearing and Motion to Defer the prehearing conference with the Nuclear Regulatory Commission ("NRC").

The NRC Staff and Safety Light are negotiating currently how Safety Light may satisfy the staff's Order Modifying Licenses (Effective Immediately) dated March 16, 1989 and Order Modifying Licenses (Effective Immediately) dated August 21, 1889 which is the subject of this proceeding. On August 9, 1989, Safety Light, United States Radium Corporation, and USR Industries, Inc. and their successors and subsidiaries submitted a revised site characterization plan. The NRC staff has

8910190164 891005 NMSS LIC30 37-00030-02 PDC reviewed this plan and has determined that, with certain exceptions, it satisfies thetechnical criteria for a site characterization plan given in the March 16, 1989 Order. Accordingly, on September 11, 1989, the staff approved the plan, subject to correction of the identified deficiencies. On September 18, 1989, Safety Light proposed to submit a Work Plan by November 2, 1989, which would correct the deficiencies identified by the staff and to file the Trust Agreement on October 21. Additionally, on September 19, 1989, Safety Light and the staff had further discussions with regard to the August 21, 1989, Order. As these facts show, the negotiations are proceeding in a satisfactory manner and may lead to a settlement of the case between Safety Light and the NRC staff.

In filing a request for a hearing, Safety Light intends to preserve its rights in the event a settlement is not reached. In light of the negotiations described above, Safety Light simultaneously moves to defer the prehearing conference until Thursday, April 5, 1990, by which time settlement negotiations may be completed.

Respectfully Submitted, una

D. Jane Drennan, Esq. 1615 D. Street, N.W. Suite 650 Washington, D.C. 20036 (202) 659-3005

Counsel For SAFETY LIGHT CORPORATION

Dated this $2N\lambda$ day of October, 1989

-2-

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served upon the following by mail on this $\mathcal{J}^{\nu D}$ day of October, 1989:

> James Lieberman Director, Office of Enforcement U.S. Nuclear Regulatory Commission ATTN: DOCUMENT CONTROL DESK Washington, D.C. 20555

Assistant General Counsel for Enforcement Office of the General Counsel U.S. Nuclear Regulatory Commission ATTN: DOCUMENT CONTROL DESK Washington, D.C. 20555

Hugh L. Thompson, Jr. Deputy Executive Director for Nuclear Safety, Safeguards and Operations Support U. S. Nuclear Regulatory Commission Washington, D.C. 20555

William Russell Regional Administrator NRC Region I 475 Allendale Road King of Prussia, PA 19406

Lee Bettenhausen Division Director NRC Region I 475 Allendale Road King of Prussia, PA 19406

Kokhar Jane Drennan

Dated at Washington, D.C. this 2nd day of October, 1989