

9311

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

2307 N STREET, N. W.
WASHINGTON, D. C. 20037
(202) 663-8000

'89 OCT 17 A9:19

OFFICE OF SENIOR ADV
DOCKETING & SERVICE

BRANCH FACSIMILE
(202) 663-8007

TELEX/CABLE
89-2693 (SHAWLAW WSH)

VIRGINIA OFFICE
1501 FARM CREDIT DRIVE
MCLEAN, VIRGINIA 22102
(703) 790-7900
FACSIMILE
(703) 621-2397

GEORGE V. ALLEN, JR., P.C.*
SCOTT A. ANENBERG, P.C.
MARK AUGENBLICK, P.C.
DEAN D. AULICK, P.C.*
FRANK J. BALTZ, P.C.**
THOMAS A. BAXTER, P.C.
RICHARD S. BEATTY
LAWRENCE W. BIERLEIN
ERNEST L. BLAKE, JR., P.C.
PHILLIP D. BOSTWICK, P.C.
NATHANIEL P. BREED, JR., P.C.
WINTHROP N. BROWN, P.C.
JOHN M. BRYSON, III*
JAMES H. BURNLEY IV, P.C.**
JOHN L. CARR, JR.
DEBORAH B. CHARNOFF
GERALD CHARNOFF, P.C.*
L. DUANE CHEEK, P.C.
BRUCE W. CHURCHILL, P.C.
ROBERT E. COHN
B. SCOTT CUSTER, JR.
DAVID J. CYNAMON, P.C.
JOHN ENGEL, P.C.**
JAY A. EPSTEIN, P.C.
STEPHEN P. FOLEY**
ELLEN A. FREDL, P.C.

WARWICK R. FURR, III**
HARRY H. GLASSPIEGEL
ROBERT M. GORDON**
JAMES B. HAMLIN, P.C.
R. TIMOTHY HARLON, P.C.
PHILIP J. HARVEY
SHEILA MCC. HARVEY
KENNETH J. HAUTMAN, P.C.
J. PATRICK HICKEY, P.C.
C. THOMAS HICKEY, III, P.C.**
THOMAS C. HILL, P.C.
W. MICHAEL HOUSE, P.C.**
STEPHEN S. HUTTLER, P.C.
CARLETON S. JONES, P.C.
CAMPBELL KILLEFER
ALLEN J. KLEIN
FREDERICK L. KLEIN, P.C.
MARTIN D. KRALL, P.C.
J. THOMAS LENHART, P.C.
FRED A. LITTLE, P.C.
STEVEN M. LUCAS, P.C.
LOUISE A. MATHEWS
THOMAS H. MCCORMICK
JACK MCKAY, P.C.*
STEVEN L. MELTZER, P.C.

PAUL F. MICREY, P.C.
DAVID L. MILLER, P.C.**
LESLIE A. NICHOLSON, JR., P.C.
JOHN H. O'NEILL, JR., P.C.
RICHARD J. PARRINO, P.C.
ROBERT D. PAUL
VICTORIA J. PERKINS, P.C.
PAUL S. PILEGRI, P.C.
STUART L. PITTMAN, P.C.
RAMSAY D. POTTS, P.C.
STEPHEN D. POTTS, P.C.
JOHN S. RHINELANDER, P.C.
ROBERT S. ROBBINS, P.C.
GEORGE M. ROGERS, JR., P.C.
BARBARA M. ROSSOTTI, P.C.
MICHAEL A. SCHLANGER
JAY E. SILBERG, P.C.
RALPH A. TAYLOR, JR., P.C.*
CHARLES B. TEMKIN, P.C.
PAUL N. THOMAS
MATIAS F. TRAVIESO-DIAZ, P.C.
R. KENLY WEBSTER, P.C.
SHELDON J. WEISEL, P.C.
JEFFERY L. YADLON, P.C.
ROBERT E. ZANLER, P.C.

SENIOR COUNSEL
ROBERT E. COHN
JOHN F. DEALY**
FRED DRASNER
DAVID M. RUBENSTEIN, P.C.
GEORGE F. TROWBRIDGE, P.C.

COUNSEL
THOMAS H. BROWNELL**
THOMAS E. CROCKER, JR.
PETER J. FERRARA
PAUL A. GAUKLER
JOHN H. MORE
OLISSA A. RIDGWAY
BARRY R. SCHENOF
HOWARD K. SHAPAR
BLAIR C. WOODSIDE, III

* RESIDENT IN VIRGINIA
** NOT ADMITTED IN D.C.
+ ADMITTED IN VIRGINIA

WRITER'S DIRECT DIAL NUMBER

(202) 663-8035

October 6, 1989

Helen Hoyt, Esq.
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: In the Matter of Safety Light Corporation, et al.,
Docket Nos. 030-05980, et al. - OM-2

Dear Judge Hoyt:

As of October 5, 1989, 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 above-referenced proceeding. Enclosed is the Notice of Appearance of Howard K. Shapar and myself.

I have also enclosed a copy of our letter dated October 5, 1989, addressed to Mr. James Lieberman of the Nuclear Regulatory Commission. That letter advises the Commission staff of our representation of the aforementioned clients in lieu of A. Patrick Nucciarone, Esq. of Hannoeh Weisman.

Very truly yours,

Gerald Charnoff
Gerald Charnoff

D503

8910250091 891006
NMSS LIC30
37-00030-02 PDR

Enclosures

SHAW, PITTMAN, POTTS & TROWBRIDGE

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

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

TELEX/CABLE
89-2693 (SHAWLAW WSH)

TELEPHONE
(202) 663-6032

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

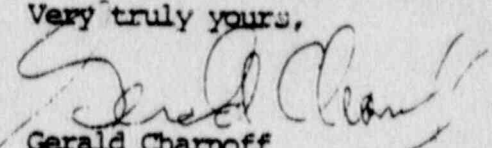
OCTOBER 5, 1989

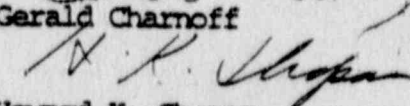
Dear Mr. Lieberman:

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


Howard K. Shapar

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

~~8910190160~~ yp.

October 6, 1989

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

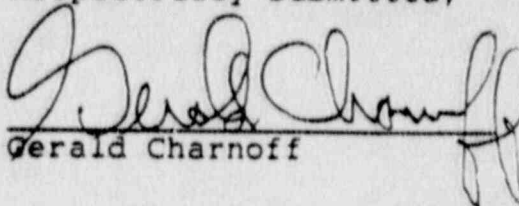
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

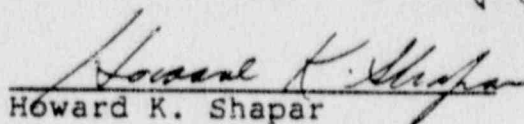
In the Matter of)	
SAFETY LIGHT CORPORATION)	Docket Nos. 030-05980
UNITED STATES RADIUM CORPORATION)	030-05982
USR INDUSTRIES, INC.)	030-05981
USR LIGHTING, INC.)	030-08335
USR CHEMICALS, INC.)	030-08444
USR METALS, INC.)	
USR NATURAL RESOURCES, INC.)	(ASLBP No. 89-590-01-OM)
LIME RIDGE INDUSTRIES, INC.)	
METREAL, INC.)	

NOTICE OF APPEARANCE

The undersigned, being attorneys at law in good standing admitted to practice before courts in the District of Columbia, hereby enter their appearance as counsel on behalf of USR Industries, Inc.; USR Lighting, Inc.; USR Chemicals, Inc.; USR Metals, Inc.; and USR Natural Resources, Inc. in proceedings related to the above-captioned matter.

Respectfully submitted,


Gerald Charnoff


Howard K. Shapar

SHAW, PITTMAN, POTTS &
TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037
(202) 663-8001

3 pp.

~~09/01/00020~~

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
SAFETY LIGHT CORPORATION)	Docket Nos. 030-05980
UNITED STATES RADIUM CORPORATION)	030-05982
USR INDUSTRIES, INC.)	030-05981
USR LIGHTING, INC.)	030-08335
USR CHEMICALS, INC.)	030-08444
USR METALS, INC.)	
USR NATURAL RESOURCES, INC.)	(ASLBP No. 89-590-01-OM)
LIME RIDGE INDUSTRIES, INC.)	
METREAL, INC.)	

CERTIFICATE OF SERVICE

I hereby certify that copies of the "NOTICE OF APPEARANCE" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 6th day of October, 1989:

Helen Hoyt, Esq.
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Frederick J. Shon, Esq.
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Board
Panel (1)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Board Panel (6)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

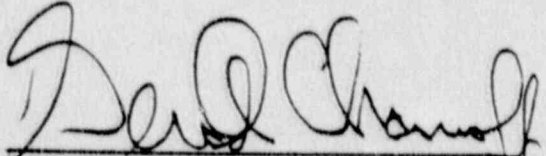
Adjudicatory File (2)
Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

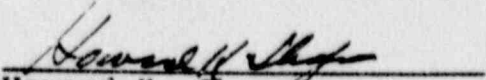
Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Jay Gutierrez, Esq.
Regional Counsel
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

A. Patrick Nucciarone, Esq.
Hannock Weisman, Counsellors at Law
4 Becker Farm Road
Roseland, NJ 07068

Michael J. O'Donoghue, Esq.
Geoffrey L. Beauchamp, Esq.
Wisler, Pearlstine, Talone,
Craig & Garrity
515 Swede Street
Norristown, PA 19401-4880


Gerald Charnoff
Counsel for USR Industries,
Inc.


Howard K. Shapat
Counsel for USR Industries,
Inc.

S:090hks5440.89