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January 9, 1990

Mr. Charles E. Norelius  
Director  
Division of Radiation Safety and Safeguard  
U.S. NRC, Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

RE: In the Matter of:  
ADVANCED MEDICAL SYSTEMS, INC.  
Docket No. 30-16055-SP; License No. 34-19089-01; EA86-155;  
ASLBP No. 87-545-01-SP;  
U. S. NUCLEAR REGULATORY COMMISSION

and

ADVANCED MEDICAL SYSTEMS, INC., et.al.  
V.  
UNITED STATES OF AMERICA, et.al.  
United States District Court for the Northern District of Ohio,  
Eastern Division;  
Civil Action No. 189CV1917; Judge Manos

Dear Mr. Norelius:

This letter will confirm our telephone conversation of Tuesday, January 9, 1990 concerning your allegation that prior to September, 1989 AMS did not have 10 C.F.R. Part 21 procedures. At no time prior to your letter has the NRC ever indicated that AMS did not have these procedures. Therefore, I find your position unwarranted. As discussed, at no time were our revised 10 C.F.R. Part 21 procedures requested by the NRC; they were provided voluntarily as a gesture of good faith. We are very sorry that you refuse to acknowledge this fact.

AMS has always followed 10 C.F.R. Part 21. As we have discussed at length, had your inspectors not negligently failed to inform us that our procedures were, in your eyes deficient, we would have voluntarily modified them years ago. Instead we relied, to our detriment, on the representations made by those inspectors that our procedures were sufficient. Similarly, we relied, to our detriment, on the fact that at the NRC Enforcement Conference, held December 23, 1986 the NRC represented that the matter involving the Sodeco Impulse Counter was resolved.

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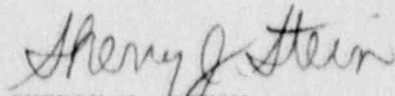
Mr. Charles E. Norelius

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Again, we are extremely disappointed by your continued refusal to investigate the negligence of the inspectors investigating AMS procedures through the years, and by your refusal to work with AMS in amicably resolving this matter.

Sincerely,



SHERRY J. STEIN

Director of Regulatory Affairs

SJS/cjc

cc: Seymour S. Stein, Ph.D., P.E.  
Administrative Judge Robert M. Lazo  
Administrative Judge Ernest E. Hill  
Administrative Judge Harry Foreman  
Director, Office of Enforcement  
Assistant General Counsel for Enforcement  
Regional Administrator A. B. Davis  
Stephen H. Lewis, Esq.  
Colleen P. Woodhead, Esq.  
Atomic Safety and Licensing Board Panel  
Atomic Safety and Licensing Appeal Board Panel  
Richard J. Thornburgh, U.S. Attorney General  
Alex A. Rokakis, Assistant U.S. Attorney, Northern District of Ohio  
Office of Investigation, Washington, D.C.  
Janet G. Aldrich, Esq.