



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JAN 0 8 1990

Gerald Charnoff, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037

In the Matter of
SAFETY LIGHT CORPORATION, UNITED STATES RADIUM CORPORATION,
USR INDUSTRIES, INC., USR LIGHTING, INC., USR CHEMICAL PRODUCTS, INC.,
USR METALS, INC., U.S. NATURAL RESOURCES, INC.,
LIME RIDGE INDUSTRIES, INC., AND METREAL, INC.
(Bloomsburg PA. Site Decontamination)
Docket Nos.: 30-05980, 30-05981, 30-05982,
30-08335, 30-08444, ASLBP No. 89-050-01-0M

Dear Mr. Charnoff:

Pursuant to the Licensing Board's order dated December 1, 1989, please find enclosed the NRC staff's tentative witness list and first document request. If the staff identifies any other potential witnesses, I will inform you as soon as possible. Likewise, if the staff identifies any questions it would like answered or further documents it would like produced, I will transmit those interrogatories or document requests to you as soon as possible.

I will call you in the middle of January in order to begin scheduling depositions for February and March. If you have any questions or if I can be of any assistance, please call me.

Sincerely,

Robert M. Weisman

Robert M. Weisman
Counsel for the NRC staff

Appendix A: Tentative Witness List

1. James H. Joyner, III, Branch Chief
Nuclear Materials Safety Branch
Division of Radiation Safety and Safeguards
NRC Region I
2. John D. Kinneman, Section Chief
Nuclear Materials Safety Branch
Division of Radiation Safety and Safeguards
NRC Region I
3. Francis M. Costello, Inspector
Nuclear Materials Safety Branch
Division of Radiation Safety and Safeguards
NRC Region I

Appendix B: Documents Requested

1. Any and all notes, notebooks, memoranda, journals, records, correspondence, logs, minutes, reports, draft reports, drafts, and other documents of any kind or character, whether internal or public, referring or relating to:
 - a. The incorporation of USR Industries, Inc.;
 - b. The incorporation of Industries Merger Company, Inc.;
 - c. The merger of United States Radium Corporation in 1980;
 - d. The transfer of assets of U.S. Radium to USR Industries, Inc., or subsidiaries of USR Industries, Inc.;
 - e. The sale of Safety Light Corporation in 1982.
2. Any and all documents, as listed in (1) above, of any kind or character, whether internal or public, referring or relating to:
 - a. The management of, or management decisions regarding, U.S. Radium or Safety Light between the 1980 reorganization and the 1982 sale of Safety Light;
 - b. Any relationship of whatever form and of whatever duration, by contract or otherwise, from the 1982 sale up to and including the present, between Safety Light and USR Industries, Inc. or any subsidiary of USR Industries, Inc.;
 - c. Any litigation involving any former U.S. Radium site.
3. Any and all documents, as listed in (1) above, of any kind or character, whether internal or public, referring or relating to:
 - a. Contamination of any kind at or on the Bloomsburg site;
 - b. Any liability insurance of any kind, whether now in effect or no longer in effect, for the Bloomsburg site;
 - c. Contamination of any kind at or on any other former U.S. Radium site;
 - d. Any liability insurance of any kind, whether now in effect or no longer in effect, for all other former U.S. Radium site.
4. Any and all documents, as listed in (1) above, of any kind or character, whether internal or public, referring or relating to any and all sales, distributions, or other transfers of assets from USR Industries, Inc. or its subsidiaries to shareholders of USR Industries, Inc., since the incorporation of USR Industries, Inc., up to and including the present.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

SAFETY LIGHT CORPORATION
UNITED STATES RADIUM CORPORATION
USR INDUSTRIES, INC.
USR LIGHTING, INC.
USR CHEMICALS, INC.
USR METALS, INC.
USR NATURAL RESOURCES, INC.
LIME RIDGE INDUSTRIES, INC.
METREAL, INC.
(Bloomsburg Site Decontamination)

Docket Nos.: 030-05980
030-05982
030-05981
030-08335
030-08444

(ASLBP No. 89-590-01-0M)

CERTIFICATE OF SERVICE

I hereby certify that copies of "LETTERS DATED JANUARY 8, 1990, AND ATTACHMENTS (DISCOVERY REQUESTS) FROM ROBERT M. WEISMAN TO GERALD CHARNOFF, ESQ. AND MICHAEL J. O'DONOGHUE, ESQ., GEOFFREY L. BEAUCHAMP, ESQ., RESPECTIVELY," in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, this 17th, day of January, 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*
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

Marshall A. Miller
Administrative Judge
1920 South Creek Boulevard
Sprce Creek Fly-In
Dayton Beach, Florida 32124

Atomic Safety and Licensing Appeal
Panel (5)*
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Office of the Secretary*
U.S. Nuclear Regulatory Commission
Washington, DC 20555
Attn: Docketing and Service Section

Mr. Ralph T. McElvenny
USR Industries, Inc.
550 Post Oak Blvd.
Suite 550
Houston, TX 77027

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

Jack Miller, President
Safety Light Corporation
4150-A Old Berwick Road
Bloomsburg, PA 17815

Mr. William T. Russell
Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

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

Gerald Charnoff, Esq.
Shaw, Pittman, Potts & Trowbridge
2300 N. Street, N.W.
Washington, DC 20037

Robert M. Weisman
Robert M. Weisman *B7 BMB*
Counsel for NRC Staff