

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:

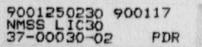
Pursuant to the Licensing Board's order dated December 1, 1989, please find enclosed the NRC staff's tentative witness list and first document request. If the staff identifies any other potential witnesses, I will inform you as soon as possible. Likewise, if the staff identifies any questions it would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

 James H. Joyner, III, Branch Chief Nuclear Materials Safety Branch Division of Radiation Safety and Safeguards NRC Region I

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- John D. Kinneman, Section Chief Nuclear Materials Safety Branch Division of Radiation Safety and Safeguards NRC Region I
- Francis M. Costello, Inspector Nuclear Materials Safety Branch Division of Radiation Safety and Safeguards NRC Region I

Appendix B: Documents Requested

- 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.
- Any and all documents, as listed in (1) above, of any kind or character, whether internal or public, referring or relating to:
 - 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.
- 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:
 - 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

Frederick J. Shon* Administrative Judge Atomic Safety and Licensing Board 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 Dr. Oscar H. Paris 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 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

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Robert M. Weisman BIBMB Robert M. Weisman

Counsel for NRC Staff