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)

AFFIDAVIT OF PATRICIA C. VACCA

I, Patricia C. Vacca, being first duly sworn, depose and state as follows:

I am currently employed by the United States Suclear Regulatory Commission (NRC) as Senior Project Manager (Health Physics). I have prepared, supervised, or jointly prepared, or jointly supervised or reviewed the preparation of responses to interrogatories 3, 5 and 7.

I hereby certify that the answers to the above numbered interrogatories are true and correct to the best of my knowledge and belief.

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Subscribed and sworn to before me this 9th day of February, 1990.

Malada X. ME Small Notary Public My commission expires: 7/1/90

9002150034 900209 NMSS LIC30 37-00030-02 PDR

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.	Docket Nos.: 030-05980 030-05982 030-05981 030-08335 030-08444
USR METALS, INC. USR NATURAL RESOURCES, INC. LIME RIDGE INDUSTRIES, INC. METREAL, INC. (Bloomsburg Site Decontamination)) (ASLBP No. 89-590-01-0M)

AFFIDAVIT OF JOHN D. KINNEMAN

I, John D. Kinneman, being first duly sworn, depose and state as follows:

1 am currently employed by the United States Nuclear Regulatory Commission (NRC) as Section Chief, Nuclear Materials Safety Section B, Division of Radiation Safety and Safeguards. I have prepared, supervised, or jointly prepared, or jointly supervised or reviewed the preparation of responses to interrogatories 1, 2, 3, 4, 5, 6, 7, 8, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 26, 28, 30, 32, 34, 36, 37, 38, 40, 42, and 44.

I hereby certify that the answers to the above numbered interrogatories are true and correct to the best of my knowledge and belief.

Subscribed and sworn to before me this 9th day of February, 1990.

Notary Public

My commission expires:

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)

AFFIDAVIT OF FRANCIS M. COSTELLO

1, Francis M. Costello, being first duly sworn, depose and state as follows:

I am currently employed by the United States Nuclear Regulatory Commission (NRC) as Senior Health Physicist, Nuclear Materials Safety Section B, Division of Radiation Safety and Safeguards. I have prepared, supervised, or jointly prepared, or jointly supervised or reviewed the preparation of responses to interrogatories 1, 2, 3, 4, 5, 6, 7, 8, 9, 16, 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44 and 45

I hereby certify that the answers to the above numbered interrogatories are true and correct to the best of my knowledge and belief.

Subscribed and sworn to before me this 9th day of February, 1990.

Notary Public

My commission expires:

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.	Docket Nos.:	030-05980 030-05982 030-05981 030-08335 030-08444
USR NATURAL RESOURCES, INC. LIME RIDGE INDUSTRIES, INC. METREAL, INC. (Bloomsburg Site Decontamination)) (ASLBP No. 89) }	-590-01-OM)

AFFIDAVIT OF JAMES H. JOYNER, III

I, James H. Joyner, III, being first duly sworn, depose and state as follows:

I am currently employed by the United States Nuclear Regulatory Commission (NRC) as Project Manager, Division of Radiation Safety and Safeguards. I have prepared, supervised, or jointly prepared, or jointly supervised or reviewed the preparation of responses to interrogatories 3, 9, 10, and 11.

I hereby certify that the answers to the above numbered interrogatories are true and correct to the best of my knowledge and belief.

Subscribed and sworn to before me this 9th day of February, 1990.

Notary Public

My commission expires:

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 CHEMICAL PRODUCTS, INC. USR METALS, INC. U.S. 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) 90-598-01-0M-2)

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S RESPONSE TO INTERROGATORIES OF USR INDUSTRIES, INC., USR METALS, INC., USR LIGHTING, INC., USR CHEMICAL PRODUCTS, INC., AND U.S. NATURAL RESOURCES, INC. TO THE NUCLEAR REGULATORY COMMISSION STAFF" in the above-captioned proceeding have been served following by deposit in the United States mail, first class, or as device by an asterisk through deposit in the Nuclear Regulatory Commission internal mail system, and by messenger as indicated by double asterisk is 9th day of February, 1990:

James H. Carpenter* 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 E. Miller Administrative Judge 1920 South Creek Boulevard Spruce Creek Fly-In Daytona 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

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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. Nuclea: 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 & Troubridge 2300 N. Street. N.W. Washington, DC 20037

Robert M. Werswan

Robert M. Weisman Counsel for NRC Staff