

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos.:	030-05980
SAFETY LIGHT CORPORATION)		030-05982
UNITED STATES RADIUM CORPORATION)		030-05981
USR INDUSTRIES, INC.)		030-08335
USR LIGHTING, INC.)		030-08444
USR CHEMICALS, INC.)		
USR METALS, INC.)		
USR NATURAL RESOURCES, INC.)	(ASLBP No. 89-590-01-0M)	
LIME RIDGE INDUSTRIES, INC.)		
METREAL, INC.)		
(Bloomsturg Site Decontamination))		

AFFIDAVIT OF JOHN D. KINNEMAN

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

I 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: _____

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LIME RIDGE INDUSTRIES, INC.)		
METREAL, INC.)		
(Bloomsburg Site Decontamination))		

AFFIDAVIT OF FRANCIS M. COSTELLO

I, 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
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030-05982
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)
(ASLBP No. 89-590-01-0M)

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: _____

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

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Adjudicatory File (2)*
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