

10621

RELATED CORRESPONDENCE

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'90 MAR -7 P5:14

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD OFFICE OF SECRETARY
DOCKETING & RECORDS
MANAGEMENT

In the Matter of:

Safety Light Corporation
United States Radium Corporation
USR Industries, Inc.
USR Lighting, Inc.
USR Chemical, Inc.
USR Metals, Inc.
U.S. Natural Resources, Inc.
Lime Ridge Industries, Inc.
Metreal, Inc.

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

(Bloomsburg Site Decontamination)

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

REQUEST FOR RESPONSE TO SUPPLEMENTAL INTERROGATORIES

Pursuant to 10 CFR §§ 2.740b and 2.720(h), USR Industries, Inc., USR Metals, Inc., USR Lighting, Inc., USR Chemical Products, Inc. and U.S. Natural Resources, Inc. (collectively "USR Industries") request that the presiding officer in the above-captioned action require the Nuclear Regulatory Commission staff to respond to the attached supplemental interrogatories.

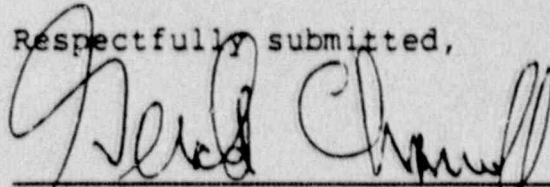
The supplemental interrogatories relate to the bases for the March 16, 1989 and August 21, 1989 Orders in this proceeding. USR Industries is not the licensee at the Bloomsburg site, and has no involvement with the site other than this proceeding. In addition, USR Industries had no contact with the NRC regarding the site

9003160119 900215
NMSS LIC30 PDR
37-00030-02

3503

until April 1988. Therefore, the answers to the supplemental interrogatories are necessary to a proper decision in the proceeding and are not reasonably obtainable from any other source.

Respectfully submitted,



Gerald Charnoff, P.C.

Howard K. Shapar

Christine M. Nicolaides

Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, D.C. 20037
(202)663-8000

Attorneys for USR Industries, Inc.,
USR Metals, Inc., USR Lighting, Inc.,
USR Chemical Products, Inc., and
U.S. National Resources, Inc.

Dated: February 15, 1990

N:040CMN5440.90

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'90 MAR -7 P5:14

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD OFFICE OF SECRETARY
REGULATORY & SERVICE
BRANCH

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.)	
U.S. NATURAL RESOURCES, INC.)	(ASLBP No. 89-590-01-OM)
LIME RIDGE INDUSTRIES, INC.)	
METREAL, INC.)	

CERTIFICATE OF SERVICE

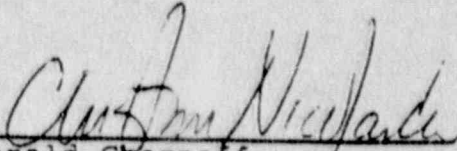
I hereby certify a copy of the supplemental interrogatories of USR Industries, Inc., USR Lighting, Inc., USR Chemicals, Inc., USR Metals, Inc. and U.S. Natural Resources, Inc., in the above-captioned proceeding, have been served on the following by hand or by deposit in the United States mail, first class, this 15th day of February, 1990:

Marshall A. 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
(Hand Delivered)

D. Jane Drennan, Esq.
1615 L Street, N.W.
Washington, D.C. 20036
(Hand Delivered)

Robert M. Weisman, Esq.
Counsel
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, Maryland 20852
(Hand Delivered)


Gerald Charnoff
Howard K. Shapar
Christine M. Nicolaides

N:043CMN5440.90