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## FRIED, FRANK, HARRIS, SHRIVER & JACOBSON

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WRITER'S DIRECT LINE

July 23, 1993

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## BY FAX AND FIRST CLASS MAIL

Mr. John A. Grobe
Chief, Fuel Cycle and
Decommissioning Branch
United States Nuclear
Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137-5927

Re: 504 East 105 Street, Cleveland Ohio

Dear Mr. Grobe:

I am writing on behalf of The Pullman Company ("Pullman") in response to your June 23, 1993 letter to Craig Bowman requesting certain information regarding the above-referenced facility.

## Ownership History

It appears that the facility was built in approximately 1920 by Royal Vacuum. That company apparently owned and operated the facility until the early 1950s, at which time it sold the facility to Clevite Corporation.

Clevite Corporation owned and operated the facility until the early 1960s. In approximately 1962 or 1963, Clevite Corporation merged into Gould Inc. and ceased to exist. Gould acquired the facility as a result of the merger.

Gould owned and operated the facility until September 1981. At that time, the facility was purchased from Gould, along with other assets, by Imperial Clevite, Inc. Imperial Clevite had been set up by a group of investors sometime prior

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Mr. John A. Grobe

to the September 1981 transaction as an acquisition vehicle, but had no actual operations until it acquired an industrial parts production business from Gould. Imperial Clevite changed its name to Clevite Industries, Inc. in June 1986. Despite the similarity in names, Imperial Clevite and Clevite Industries were not related to Clevite Corporation.

In September 1987, Pullman acquired Clevite
Industries. At various times, Pullman leased portions of the
facility to Gould, JP Industries, and Grid Seal, as discussed
below. Pullman sold the facility in December 1991 to its
current owner, Neighborhood Progress, Inc.

## Operations

Pullman (and, previously, Imperial Clevite and Clevite Industries (collectively, with Pullman, referred to hereafter as "Pullman")) maintained limited operations at the facility from September 30, 1981 until 1989. After 1989, although certain operations were conducted by lessees of portions of the facility, Pullman itself no longer conducted any activities there.

The activities conducted by Pullman at the facility consisted of (with one exception, discussed below) research and development activities. Pullman conducted destructive testing of bearings, in connection with its manufacture of bearings at other facilities. Pullman sold this bearings business to JP Industries in 1987. In connection with this sale, JP Industries also leased that portion of the facility on which the bearings testing was conducted, and operated it until 1989.

Pullman's laboratory operations at the facility also allowed for material analysis as well as research for product lines. Additionally, research and/or testing relating to rubber processing, polymer technology and metal parts processing was conducted. These operations all ceased in 1986 or 1987. Research regarding iron powder was conducted until approximately 1988.

The only manufacturing-type operations Pullman conducted at the facility consisted of metal processing of titanium powder, which was pressed, sintered and machined. Pullman sold this business in 1989, and it moved out of the facility in 1990.

Subsequent to the September 1981 sale, Gould leased portions of the facility and continued certain operations there, apparently including its Gould Foil electroplating operations and production of transducer rings. Gould's lessee operations continued, at least in part, through 1986.

FRIED, FRANK, HARRIS, SHRIVER & JACOBSON July 23, 1993 Mr. John A. Grobe - 3 -Another portion of the facility was leased by Grid Seal, which conducted processing of nickle graphite powder there. No operations or activities involving nuclear or radioactive materials or processes were conducted at the facility at any time by Imperial Clevite, Clevite Industries, or Pullman, their lessees, or, it is believed, their successor at the facility. Very truly yours, Dane Wasman Jane G. Wasman JGW/tc 9103j cc: Craig Bowman, Esq.