

CAMEO DIAGNOSTIC CENTRE, INC.

SPECIALIZED MEDICAL IMAGING AND MEASUREMENTS

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Docket No. 030-29567
EA 94-035

Mr. James Lieberman, Director, Office of Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECTS: 1) Response to Modified ORDER dated Feb. 15, 1994
2) Request for a hearing by Atomic Safety and Licensing Board

Four decades ago the unquestioned intent of the U.S. Congress in legislating the original Atomic Energy Act and successive revisions was to provide a mechanism for assuring public health and safety in the use of atomic energy. The herein ORDER reflects not at all on public health and safety. Rather, the entire issue relates to whether or not Licensee provided NRC with information that was "complete and accurate in all material respects."

Absent any reference points as to precisely what is "complete" or "accurate" or "material" these words can be interpreted differently by different people. In the hands of certain NRC officials with power to interpret these words in ways that do not comport with issues of public health and safety but rather with intent to harass and punish, the exercise of that power in this matter has evolved in abusive, vindictive, illegal and possibly criminal actions.

The voluminous evidence accumulated in this case would convince reasonable citizens that NRC has indeed betrayed the trust placed on it by their Congressional representatives. This Licensee intends that Congress be made aware how NRC conducts its business and whether it thereby jeopardizes public health and safety.

Licensee cannot further respond to herein ORDER and claims it is flawed by virtue of unsubstantiated, vague and non-attributable statements. Further, that the deliberate omission in the ORDER of facts that are on record represents clear evidence of malice toward Licensee. It is this personal animus, this intent to hurt and do harm to Licensee that has motivated a cabal of NRC staff to conspire and abuse their power of position. The details of abuse of power will be disclosed during testimony under oath from certain NRC persons.

Under pains and penalties of perjury I believe the above to be true.

March 14, 1994

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