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RELATED CORRESPONDENCE



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555-0001

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March 23, 1994

OFFICE OF SECRETARY
DOCKETING & SERVICE
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Mr. Paul J. Rosenbaum
Cameo Diagnostic Centre, Inc.
155 Maple Street
Springfield, MA 01105

In The Matter of
CAMEO DIAGNOSTIC CENTRE, INC.
Docket No. 030-29567-CivP
ASLBP No. 94-686-01-CivP

Dear Mr. Rosenbaum:

This is in response to your letter of March 4, 1994, in which you requested information about the "technical competency" of James Lieberman, Joseph DelMedico, and Patricia Santiago. In particular, you requested information concerning the institution at which their training took place, the duration of such training, and a description of each technical subject covered in the training. I am treating these requests as an informal discovery request.

Enclosed is a copy of Ms. Santiago's Statement of Professional Qualifications, which identifies the institutions where her training took place and the duration of her training. Ms. Santiago is no longer in possession of course catalogs or other documents describing the technical subjects covered in her training and is, therefore, unable to produce them.

The Staff objects to the request for production of information concerning the technical competency of Messrs. Lieberman and DelMedico because, presently, the Staff does not intend to call either Mr. Lieberman or Mr. DelMedico as a witness in this proceeding. Consequently, the information sought by you with respect to Messrs. Lieberman and DelMedico is not relevant to the subject matter involved in the proceeding and does not appear reasonably calculated to lead to the discovery of admissible evidence. See 10 C.F.R § 2.740. In the event that the Staff later decides to call either Mr. Lieberman or Mr. DelMedico as a witness, or in the event they are otherwise required to appear as witnesses, the Staff will provide you with the information sought in your request as it pertains to them.

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In addition, in your letter you raised allegations relating to certain actions of Mr. DelMedico. On March 10, 1994, the matters specified in your letter were forwarded to the NRC Office of the Inspector General by the Director of the Office of Enforcement.

Sincerely,

Catherine L. Marco

Catherine L. Marco
Counsel for NRC Staff

Enclosure: As stated

cc w/encls: Service list

Statement of Professional Qualifications for Patricia A. Santiago

Current Titles and Business Address:

Assistant Director for Materials, Office of Enforcement
U. S. Nuclear Regulatory Commission
Mail Stop 7H5
Washington, D. C. 20555

- Experience: Enforcement Specialist (Rotational Assignment, July 1992 to 3/93), Office of Enforcement, NRC
- Health Physicist, (July 1991 to 3/93) Office of Nuclear Materials Safety and Safeguards, NRC
- Chief, Health Physics, Safety Office, U. S. Army Materiel Command (AMC), Department of Army, Alexandria, VA, July 1986 to June 1991.
- Health Physicist, Safety Office, U. S. Army Materiel Command (AMC), Department of Army, Alexandria, VA, January 1984 to June 1986.
- Health Physicist, Safety Office, U. S. Army Communications-Electronics Command, U. S. Army Materiel Command, Department of Army, Ft. Monmouth, NJ, July 1981 to December 1983.
- Consultant (Part time), Porter Consultants, Inc., Argyle, PA., April 1984 to December 1983.
- Supervisor, Radioactive Materials, Bureau of Radiation Protection, Department of Environmental Protection, State of New Jersey, June 1980 to July 1981.
- Radiation Physicist, Bureau of Radiation Protection, Department of Environmental Protection, State of New Jersey, January 1980 to June 1980.
- Nuclear Medicine Technologist, St. Peter's Medical Center, New Brunswick, NJ, January 1979 to January 1980.
- Nuclear Medicine Technologist, Jersey Shore Medical Center, Neptune, NJ, May 1976 to January 1979.
- Education: Rutgers University, New Brunswick, N. J., (1976-1983) 40 graduate credits in Radiation Physics, Radiation Biology, Radiation Chemistry, Internal Dosimetry, Radiation Instrumentation, Nuclear Engineering.

Statement of Professional Qualifications for Patricia A. Santiago
(continued)

John F. Kennedy School of Nuclear Medicine,
Edison, N.J. Nuclear Medicine Technologist
Certificate.

Monmouth College, W. Long Branch, N.J., (1971-
1975) B.S. Biology.

Training:

NRC, Project Managers Acquisition, (40 hr), 1991.
AMC, Total Quality Management for Managers, (40
hr), 1991; (24 hr), 1989.
AMC, Flag Officer Nuclear Accident Course, (16
hr), 1990.
AMC, Personnel Management, (40 hr), 1988.
Army, Executive Environmental and Hazardous
Materials Seminar, (16 hr), 1987.
OPM, Personnel Management for the Executive, (80
hr), 1986.
DoE, DOT Regulations for Radioactive Materials,
(40 hr), 1985.
AMC, Depleted Uranium Safety, (40 hr), 1984.
Brookhaven National Lab, Advanced Health Physics
Problems, (80 hr), 1983.
OSHA, Nonionizing Safety, (80 hr), 1982.
Oak Ridge Associated University (ORAU), Personnel
Dosimetry, (40 hr), 1982.
ORAU, Internal Dosimetry, (40 hr), 1982.
FEMA, Emergency Response for Nuclear Stations, (80
hr), 1981.
NJ State, Emergency Response, (40 hr), 1980.
DuPont, Quality Control in Radiographic
Procedures, (80 hr), 1980.
Society of Nuclear Medicine, Quality Control in
Nuclear Medicine, (12 hr) 1979.