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October 11, 1990

Charles Bechhoefer, Chairman  
Administrative Judge  
Atomic Safety and  
Licensing Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

Dr. Jerry R. Kline  
Administrative Judge  
Atomic Safety and  
Licensing Board Panel  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

Dr. Walter H. Jordan  
Administrative Judge  
Atomic Safety and  
Licensing Board Panel  
881 W. Outer Drive  
Oak Ridge TN 37830

In the matter of  
ST MARY MEDICAL CENTER - HOBART AND GARY  
Docket Nos. 0330-31379 and 030-01615 - *DM*

Dear Administrative Judges:

The undersigned, on behalf of licensed user, Dr. Koppolu P. Sarma, in the above-captioned matter, hereby objects to the "Parties Joint Status Report on Settlement Negotiations in Response to Licensing Boards, August 23, 1990 Memorandum and Order and Joint Motion for Further Deferral" submitted September 28, 1990.

Specifically, we object to the improper admission into evidence before this panel of the enclosures to the said Joint Status Report. The undersigned approved submission of the Joint Status Report without enclosures attached.

In particular, Enclosure Number 2 entitled, "License Document submitted during September 18, 1990 meeting" by the Lake Shore Health System, contains a self-serving compilation of alleged letters addressed to the undersigned which are patently prejudicial to Dr. Sarma before this panel. These letters have the intended effect of attempting to place blame on Dr. Sarma for delay in selection of the auditing team. They are an incomplete

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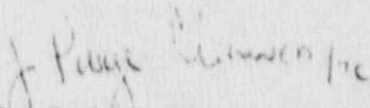
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assortment of letters containing alleged and controverted statements of fact and constitute testimony by an attorney in this matter. They were gratuitously presented during a meeting with the Regional Office of the NRC without an opportunity for the undersigned to object at that time.

For the above reasons we request the said Enclosure Number 2 be stricken from the record and disregarded by the Administrative Judges in any considerations.

Respectfully submitted this 11th day of October, 1990.

Sincerely,

  
J. Paige Clousson

JPC/tc

cc: Eugene Holler, Esq.  
Counsel for NRC Staff  
Steven H. Pratt, Esq.