

DECLARATION OF MARK S. POLLOCK

I, MARK S. POLLOCK, declare:

1. I am an attorney licensed to practice law in the State of California and in the courts of the United States, and the attorney of record for the Intervenor in the present action, Campus Committee to Bridge the Gap.

2. This hearing before the Atomic Safety and Licensing Board ("Board") regards the application of the Regents of the University of California to the Nuclear Regulatory Commission for the renewal of the operating license of the research reactor sited on the campus of the University of California at Los Angeles.

3. Intervenor propounded the first set of interrogatories regarding Contention II on or about October 20, 1980, and received answers from Applicant to those interrogatories on or about November 14, 1980. On or about November 25, 1980, Intervenor filed a motion to compel further answers to interrogatories 4, 5, 6, and 9. On or about December 22, 1980, the Board issued an Order granting Intervenor's Motion to Compel. Board also directed Intervenor to "promptly pursue all records offered to date or records offered in the future." (Order, p.4.) On or about December 30, 1980, Intervenor requested of Applicant those records offered by Applicant in its Answers to Intervenor's First Set of Interrogatories. On or about January 19, 1981, Applicant notified Intervenor it was prepared to make available the relevant financial and accounting records, offer of which Intervenor immediately availed itself, but Applicant made no mention of nor provision for making available the other records requested and previously offered by Applicant (operating logs, scheduling data, specialized Annual (Activity) Reports, and graduate student theses and

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dissertations.) On or about January 22, 1981, Applicant made further answers to Interrogatories Nos. 4, 5, 6, and 9, in response to the compelling order issued by the Board. It is those Further Answers that are the subject of this Further Motion to Compel. On or about February 4, Counsel for Intervenor contacted Counsel for Applicant and renewed request for those records previously offered and not yet made available; Intervenor provided Applicant with a list of those records.

4. Applicant's Further Answers to Interrogatories Nos. 4, 5, 6, and 9 are found by Intervenor to be as fully inadequate as the previous set of answers. Intervenor thus requests the Board to further compel Applicant to provide further answers which are adequate. The basis of inadequacy of response to Interrogatories Nos. 4, 5, 6, and 9 is set forth below.

5. The deficiencies as to these responses to Interrogatories 4, 5, 6, and 9 are manifest upon an examination of the questions, the original responses and further answers to them, and Intervenor's argument. The deficiencies are further made clear by Attachments A and B hereto, which clearly show that information Applicant asserts it does not possess is indeed in its possession, clearly demonstrating the need for a further order of this Board compelling further answers to these interrogatories. The interrogatories, answers and contentions of Applicant are, in order propounded, in the following argument as follows:

Interrogatory No. 1

For each of the years 1960 up to and including 1980 please specify:

a. What portion of the cost of maintaining and operating the Reactor was devoted to sales and services?

b. What portion of the cost of maintaining and operating the Reactor was devoted to research?

c. What portion of the cost of maintaining and operating the Reactor was devoted to education?

d. What portion of the cost of maintaining and operating the Reactor was devoted to training?

Interrogatory No. 2

For each of the years listed in Interrogatory 1 specify precisely how and by what method the costs of maintaining and operating are being allocated to the functions of sale of services, education, research and training.

Interrogatory No. 3

Specify the Source of the data on which the answers to Interrogatories 1 and 2 were based, including both summaries and raw data sources, such as log books and invoices.

* * *

INTERROGATORY NO. 4

For each answer to Interrogatories 1, 2, and 3 specify precisely how the various Reactor functions are defined:

- a. What is the definition of research?
- b. What is the definition of education?
- c. What is the definition of training?
- d. What are sold services?

ANSWER TO INTERROGATORY NO. 4:

The "function" of the Research Reactor in the Nuclear Energy Laboratories at the UCLA campus is education. That education takes the form of research and training, as well as formal classroom instruction. There are no activities of the Reactor unrelated to education.

FURTHER ANSWER TO INTERROGATORY NO. 4:

Applicant previously answered this interrogatory by stating that the "function" of the Research Reactor is education. While this remains true, Applicant will make available, pursuant to Rule 33(c), Federal Rules of Civil Procedure, its financial and accounting records which include, the operations of the Research Reactor which are relevant to this interrogatory. (See letter of January 19, 1981).

ARGUMENT REGARDING INTERROGATORY NO. 4:

Applicant's Further Answer is no less incomplete and evasive than the first response. In neither case are the definitions sought in the interrogatory provided.

In the first answer, Applicant asserts, without definition, that the function of the reactor is "education." It states that education includes research, training and classroom instruction, again without providing a single definition sought in the interrogatory.

In the Further Answer, Applicant merely restates its assertion that the function of the reactor is education. As the Board stated in issuing the Order compelling further answers, "While it might be true that everything concerned with the operation of the reactor or the University is 'educational', we do not think this simple answer is responsive to the information being sought." (Order, p. 3-4)

Applicant's only additional answer is that it will provide Intervenor with financial records. It is difficult to understand how Applicant expects Intervenor to extract Applicant's definitions of terms such as "research" and "education" from "financial and accounting records which are relevant to this interrogatory." Attachment A herein shows a sample page of the financial records Applicant has made available. Extraction of Applicant's definitions of terms from such records is clearly impossible.

As stated in the argument to Interrogatory No. 4 in the previous Motion to Compel, it is necessary for Intervenor to obtain evidence of and an understanding of Applicant's definitions of research, education, training and sold services as they relate to the operation of this reactor, so as to facilitate a thorough hearing on the issues raised in Contention II. The Board has pointed out the relevancy of the questions in its Order granting Motion to Compel (p. 3 Order: "The interrogatories are without doubt relevant to the admitted contention."). It is now incumbent upon the Applicant to respond to definitional queries. Applicant's offer of financial documents only evades one of the primary purposes of interrogatories, which is for Intervenor to obtain Applicant's own definitions and interpretations of its records and operations under oath for purposes of verification and impeachment.

Applicant has relied upon the above terms and similar terms in its Application for license renewal and in related communications with NRC Staff. Furthermore, Applicant has been willing to provide NRC Staff with its definitions of related terms, as evidenced by an April 27, 1980, letter from Applicant to NRC Staff, included herein as Attachment B. This letter only became available to Intervenor after filing its first Motion to Compel by the letter becoming available in the Public Document Room established in this case. Rather detailed definitions of reactor use

categories are given by Applicant in answer to NRC Staff questions, yet no definitions are provided to Intervenor in response to its interrogatories. Applicant must be compelled to define the terms Intervenor has requested in Interrogatory 4. An orderly and cooperative discovery process is crucial to a sound resolution of the relicensing proceedings.

INTERROGATORY NO. 5

For each of the years 1960 up to and including 1980 please specify:

- a. What percent of the income derived from operating The Reactor was devoted to the sale of services?
- b. What percent of the income derived from operating the Reactor was devoted to education?
- c. What percent of the income derived from operating The Reactor was devoted to research?

ANSWER TO INTERROGATORY NO. 5:

This interrogatory is objected to on the grounds that it is vague, ambiguous and uncertain.

Notwithstanding that objection, the Reactor income is not allocated; it is pooled for the Nuclear Energy Laboratories as a whole. See Answer to Interrogatory No. 1, which is incorporated herein by reference.

FURTHER ANSWER TO INTERROGATORY NO. 5:

As previously indicated in its answer to this interrogatory, Applicant is unable to secure the information from its files to be able to categorize the income derived as requested by this interrogatory. Nevertheless, Applicant will agree to make available its financial and accounting records of IEL income as set forth in Attachment A hereto.

ARGUMENT REGARDING INTERROGATORY NO. 5:

Once again, the Further Answer is no more responsive than the first answer. Applicant says it cannot answer the question and is unable to secure the information from its files; yet Intervenor, upon those financial records being made available referred to in the Further Answer, was readily able to pull out relevant information. The claim that Applicant cannot secure the requested information is simply untrue.

Attachment A hereto is a copy of a page of Applicant's financial records. As explained to Intervenor's representatives when they were provided those records in Applicant's accounting offices, NEL income is clearly coded and recorded. For example, in Attachment A, income from within the University is coded "53" under "Type Entry," and income from outside the University is coded "51." The amounts of income are listed with a negative sign under "Expenditures." Copies of separate invoices are included in those financial records, so that one can confirm that a particular item of income was from, say, a commercial entity and for reactor services. Thus, in Attachment A, under "Recharges," the numerous entries for Emil K. Kalil, coded "51" and inserted with a negative sign under "Expenditures" are all income from sold services of the reactor to a commercial user, Emil Kalil being in the ore assaying business. The assertion by the Applicant that it is unable to find in its own records the information requested is thus clearly untrue.

This interrogatory is in the nature of an admission in that Intervenor, although now being able to interpret Applicant's records for itself, requests Applicant to answer the question itself, for purposes of verification and impeachment. Resolution of this contention will be most difficult if the Applicant continues to refuse to state, for example, how much income it believes itself to bring in from commercial endeavors. The Further Answer provides no further answer to that question; the claim that the information

doesn't exist is untrue. Intervenor thus believes Applicant must be compelled to answer.

INTERROGATORY NO. 6:

For each of the years 1960 up to and including 1980 please specify the source, amount, and nature of all income derived from the operation of the reactor.

a. For each year listed in Interrogatory 6, how much of the income was generated by the Reactor operation, as opposed to the services?

b. For each year listed in Interrogatory 6, specify each transaction involving the operation of The Reactor for which the Nuclear Energy Lab or the University of California received payment for the operation of the Reactor including:

- 1) The name of the contracting party;
- 2) The nature of the services rendered by the Nuclear Energy Lab; and
- 3) The persons who performed the work.

ANSWER TO INTERROGATORY NO. 6:

This interrogatory is objected to on the grounds that it is vague, ambiguous and uncertain.

Notwithstanding that objection, Applicant's financial records do not permit a separation of income derived from the Reactor at UCLA from that for the Nuclear Energy Laboratories as a whole. See Answer to Interrogatory No. 5, which is incorporated herein by reference.

FURTHER ANSWER TO INTERROGATORY NO. 6:

As indicated by its previous answer to this interrogatory, Applicant has reviewed its financial records and cannot separate out Reactor income as called for in this interrogatory. Applicant will, however, make

available to Intervenor its financial and accounting records which include that information, as set forth in Attachment A hereto.

ARGUMENT REGARDING INTERROGATORY NO. 6:

The Further Answer remains no more responsive than the first. As indicated in Argument to Interrogatory No. 5, Reactor income is easily separable in Applicant's financial records; computer codes indicate whether income was from inside or outside the university, name of user indicates commercial or research function, and the individual billings for each item of income indicate income was for reactor use. However, the names of the persons who performed the work--essential in judging Applicant's claim of educational benefit in undertaking commercial work--cannot be determined from the financial records, nor is it provided in the answers to the interrogatory. The information is doubtless available in the operating logs which have not yet been provided Applicant, despite repeated requests.

The argument regarding Interrogatory No. 5 is included here by reference.

INTERROGATORY NO. 9:

For each of the years 1960 up to and including 1980 specify how much of the Reactor operating time was devoted to:

- a. Maintenance
- b. Classroom instruction
- c. Commercial rental
- d. NBL research not performed in connection with commercial reactor rental
- e. Research by University personnel other than NBL or SEAS staff
and not performed in connection with commercial rental of The Reactor.

f. Training of reactor operators

g. Other general purposes.

h. Any other activity not included above which accounted for greater than five hours in any given year.

1) For each function listed above or for any other functions that may be specified in the answer to Interrogatory 9, please define and describe what activities are being included within that functional category.

ANSWER TO INTERROGATORY NO. 9:

Prior to 1971, reactor operating time was not categorized by function, and thus it is not possible for Applicant to provide any information for those years in the form requested.

Beginning in 1971, reactor operating time was categorized into three functions: (1) maintenance, (2) classroom instructions, and (3) research. This data is extracted from operating logs by the reactor supervisor and is reported in summary form to the NRC annually. Upon intervenor's request, the reported data can be made available for examination at a mutually convenient time and place.

FURTHER ANSWER TO INTERROGATORY NO. 9:

As indicated previously, there is no functional categorization of reactor operating time prior to 1971. Beginning in 1971, reactor operating time was categorized into three functions: (1) maintenance, (2) classroom instructions, and (3) research. As stated in the previous answer, the financial and accounting records with respect to these categories and within that time frame will be made available to Intervenor at its request.

(See also Attachment A hereto).*

ARGUMENT REGARDING INTERROGATORY NO. 9:

The Further Answer to Interrogatory No. 9 is an outright defiance of the Order granting Intervenor's Motion to Compel. Not only is this response as equally unhelpful as the virtually identical response given in the original answer to No. 9, but is known by Applicant as well as Intervenor to be untruthful and misleading.

In a letter from Applicant to NRC Staff dated May 13, 1980, included herein as Attachment B, Applicant breaks down reactor use for 1976-1979 into seven categories that are virtually identical with the categories requested by Intervenor in Interrogatory 9 and which Applicant asserts is unavailable. Applicant claims information is available in only three categories--maintenance, classroom instructions, and research--and does not even provide that information, despite several requests for it. Yet six months earlier Applicant had provided detailed information regarding reactor usage, assigning precise annual hour figures for each categories; in particular breaking "research" down into commercial, MEL Experiments, UCLA Users, and Colleges and Universities, and providing definitions for each category. Applicant declines in answering Intervenor's Interrogatory to make any definition, claims information exists for only three categories, and does not even provide that information.

Applicant's response to NRC staff questions predates Intervenor's Interrogatories by over six months, yet the Answer and Further Answer to Interrogatory No. 9 deny any such knowledge and information. Thus the information Intervenor requested was clearly in the possession of Applicant

* In each instance where Applicant in its Further Answers references "Attachment A", it is referring to Attachment A of its Further Answers, letter dated January 19, 1981, offering to make available financial and accounting records. This is not to be confused with Attachment A of this Further Answer to Compel.

at the very time it denied having such information.

The information requested is clearly relevant to the contention in question. For example, the figures provided NRC staff by Applicant but the existence of which were denied in response Intervenor's Interrogatories indicate that in 1979, the last year for which figures were provided, 60% of total port-hours were for Commercial Usage, according to Applicant's own terms, and only 31 hours for Engineering Classes and only 1 hour each for NEL Experiments and Maintenance. These figures are clearly relevant to the contention and should have been provided Applicant, especially after Board's compelling Order.

Intervenor gained access to this information only after submitting its initial Motion to Compel, because the letter only thereafter became available in the recently established Public Document Room. Intervenor still needs figures for 1980, not included in the letter to NRC Staff, as well as other information included in the Interrogatory.

Applicant's offer of financial and accounting records in its Further Answer is completely evasive. Financial records deal with money matters; by Applicant's own admission in its Answers, reactor usage in hours per year are extracted from operating logs, which have not yet been made available to Intervenor, despite its requests. The offer of Financial Records as Further Answer to this Interrogatory is totally unresponsive. Intervenor wishes a full and detailed answer to the Interrogatory, which Applicant continues to refuse to provide.

CONCLUSION

Intervenor believes that Applicant's continued failure to be responsive and forthcoming in meeting its discovery obligations, even after issuance of a compelling Order by the Board, would make a request for sanctions pursuant to F.R.C.P. 37(b) appropriate under these circumstances. However, since this is the initial stage of discovery, we would prefer to attempt once more to have these problems corrected without resorting to requests for punitive measures. We reserve the right, nonetheless, should an additional compelling Order be granted by the Board and Applicant continue to be nonresponsive, to request sanctions at some future point if these problems are not resolved. It should be clear that the responses to date are both wasteful of parties' time and contentious, contributing nothing to the ongoing discovery process.

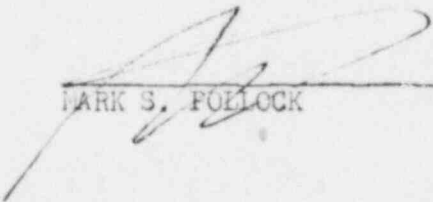
Intervenor recognizes that the Board may view Applicant's failure to respond adequately to date as not merely an evasion of Intervenor's rights to discovery and Applicant's discovery responsibilities, but also as defiance of the Board's Order compelling further answers. For its part, however, Intervenor at this juncture merely requests a Supplemental Order Compelling Further Answers.

Intervenor feels Applicant's repetitive offer to make available the financial and accounting records regarding these Interrogatories is unresponsive. As noted in the Order granting Motion to Compel, Applicant is a "sophisticated university" and should be "open and candid as to the details of all existing records." Where possible, Intervenor has pursued all records offered, although only a portion of these have to date actually been made available; however, the Interrogatories request more than what can be gleaned from the financial records so far offered. Definitions of terms, reactor usage by hour, and other information are not to be so found. A compelling Order seems once again necessary for full and complete answers to the Interrogatories.

Information requested by Intervenor has been twice denied, under oath, to exist, even after a compelling Order from the Board, even though, as Intervenor has herein demonstrated, Applicant clearly possesses the information in question and has in fact even provided some of the allegedly non-existent data to NRC Staff in response to its questions. All future discovery is at stake if Applicant does not begin to be more responsive.

Intervenor views its role in these proceedings as asking questions and providing information helpful to the Board in making its final decisions, information that would not be available otherwise were the Intervenor not a party. For that reason, Intervenor is granted by NRC regulations discovery rights and Applicants are given discovery responsibilities (and vice versa). Intervenor cannot perform its role in these proceedings if Applicant fails to live up to its discovery obligations. Intervenor hereby respectfully requests the Board grant its supplemental motion to compel further answers to Interrogatories 4, 5, 6, and 9.

DATED: February 6, 1981


MARK S. POLLOCK



ENERGY CLEAR ENERGY LABORATORY RES-155 GENERAL LEDGER - EXPENDITURES CLCCO 03/31/80 4 RECORDS

ACCOUNT NUMBER	FUND	SUB-ACCOUNT	DESCRIPTION	VENDOR NUMBER	DATE	AMOUNT	DOCUMENT NUMBER	APPROPRIATIONS	EXPENDITURES	ENCUMBRANCES	BALANCES
10000	5	50000	FORWARD	00	03 31 80	20,575.35		20,575.35			
10000	5	50000	BENEFITS	13	03 31 80	1,451.03					
10000	5	50000	BENEFITS	13	03 31 80	76.51					
10000	5	50000	BENEFITS	13	03 31 80	463.48					
10000	5	50000	BENEFITS	13	03 31 80	87.18					
10000	5	50000	BENEFITS	13	03 31 80	24.00					
10000	5	50000	BENEFITS	13	03 31 80	314.78					
10000	5	50000	BENEFITS	53	03 31 80	6.75					
10000	5	50000	BENEFITS	53	03 31 80	1,451.03					
10000	5	50000	BENEFITS	53	03 31 80	75.51					
10000	5	50000	BENEFITS	53	03 31 80	450.99					
10000	5	50000	BENEFITS	53	03 31 80	57.18					
10000	5	50000	BENEFITS	53	03 31 80	24.00					
10000	5	50000	BENEFITS	53	03 31 80	314.75					
10000	5	50000	BENEFITS	53	03 31 80	6.75					
10000	5	50000	BENEFITS	53	03 31 80	22,879.33		22,879.33			
GENERAL FUNDS											
10000	5	50000	FORWARD	00	10 18 80	88,180.00		88,180.00			
10000	5	50000	INSTITUTE	56001	09 27 80				32,555.15		
10000	5	50000	INSTITUTE	56002	02 15 80				140.00		
10000	5	50000	INSTITUTE	56003	12 14 80				75.00		
10000	5	50000	INSTITUTE	56004	11 12 80				75.00		
10000	5	50000	INSTITUTE	56005	10 31 80				75.00		
10000	5	50000	INSTITUTE	56006	09 09 80				75.00		
10000	5	50000	INSTITUTE	56007	11 03 80				75.00		
10000	5	50000	INSTITUTE	56008	10 20 80				75.00		
10000	5	50000	INSTITUTE	56009	12 25 80				75.00		
10000	5	50000	INSTITUTE	56010	11 20 80				75.00		
10000	5	50000	INSTITUTE	56011	12 12 80				75.00		
10000	5	50000	INSTITUTE	56012	11 27 80				75.00		
10000	5	50000	INSTITUTE	56013	12 31 80				75.00		
10000	5	50000	INSTITUTE	56014	09 06 80				71.50		
10000	5	50000	INSTITUTE	56015	09 30 80				140.00		
10000	5	50000	INSTITUTE	56016	09 30 80				50.00		
10000	5	50000	INSTITUTE	56017	09 30 80				205.00		
10000	5	50000	INSTITUTE	56018	09 30 80				140.00		
10000	5	50000	INSTITUTE	56019	09 30 80				267.81		
10000	5	50000	INSTITUTE	56020	09 30 80				54.03		
10000	5	50000	INSTITUTE	56021	09 30 80				140.00		
10000	5	50000	INSTITUTE	56022	09 30 80				554.00		
10000	5	50000	INSTITUTE	56023	09 30 80				143,536.85		

UNIVERSITY OF CALIFORNIA, LOS ANGELES

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DEPT. OF ENVIRONMENTAL HEALTH AND SAFETY
THE CENTER FOR THE HEALTH SCIENCES
LOS ANGELES, CALIFORNIA 90024

May 13, 1980
ROS C1510

Robert W. Reid, Chief
Operating Reactors Branch #4
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Reid:

RE: DOCKET NO. 50-142

Enclosed is the additional information you requested in your letter of April 17, 1980, regarding the application for the license renewal of the UCLA reactor. The information provided is clearly keyed to the fifteen (15) items posed in your letter.

The enclosed information has been reviewed by various members of UCLA's Radiation Use Committee and by myself. If you need further details concerning these, or other points, please let me know.

Very truly yours,

Walter F. Wegst
Director, Research
& Occupational Safety

WFW/lc
Enclosure

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Table III/1-3 provides hours/year of reactor operation for research, class instruction, and maintenance. Class instruction accounts for only 8% of the total hours of operation. Please provide a breakdown in hours/year of the types of research programs conducted and the types of customers for whom this service was performed.

Table III/1-3 will be retitled REACTOR USAGE and will be replaced with the table and explanations which follow here. Detailed figures for years prior to 1976 are not available.

REACTOR USAGE					
ACTIVITY	HOURS PER YEAR				AVG.
	1976	1977	1978	1979	
Engineering Classes	17	83	52	31	46
NEL Experiments	4	31	9	1	11
Maintenance	23	14	34	1	18
UCLA Users	109	106	105	91	103
Colleges & Universities	45	47	37	53	46
Demonstrations	10	6	7	5	7
Commercial	1	5	95	264	91
Total Port-Hours*	208	290	340	446	321
Actual Run Time	184	238	271	372	278
Equiv. Full Power Hours	131	159	203	294	197

*Port-Hours are a measure of user demand, two concurrent users for one hour contribute two port hours. Instructional and maintenance hours are counted as one port-hour per hour.

Engineering Classes include both graduate and undergraduate laboratory work which includes basic counting, activation analysis, reactor parameter determinations and operator training and requalification.

NEL Experiments are conducted by the reactor staff and include seed irradiations, gem coloring experiments, activation analysis, tracer studies, isotope production using the N-P reaction.

UCLA Users include the Chemistry, Geology, Geophysics, Meteorology, and Nuclear Medicine Departments. The types of experiments include activation analysis, tracer studies, delayed neutron counting.

Colleges and Universities include California Polytechnic Institute, California Institute of Technology, California State University - Los Angeles, California State University - Northridge, Harvey Mudd College, Mt. San Antonio College, Pierce College, University of California - Santa Barbara and University of California - San Diego. The types of experiments performed are activation analysis, fission track counting, tracer studies, reactor parameter determinations, reactor operating characteristics, reactor operations, shielding studies and health physics training.

Demonstrations were actual reactor runs in which the reactor was taken critical to demonstrate reactor parameters, characteristics or operation. Tours in which the reactor was shut down are not included. High schools, Pierce College, the press, Southern California Edison Co. and the University of California Extension were recipients of reactor demonstrations.

Commercial Users include geochemists, gem dealers and engineering firms. Mineral assay through activation analysis and delayed neutron counting, gem color alterations, and radiation shielding studies typify the types of experiments performed.

NOTE: Total Port-Hours, Actual Run Time and Equiv. Full Power Hours are included in this table. Deviations between the reported port-hours and the Total Port-Hours are due to round off errors.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

THE REGENTS OF THE UNIVERSITY OF
CALIFORNIA

(UCLA Research Reactor)

Docket No. 50-142

(Proposed Renewal of Facility
License)

CERTIFICATE OF SERVICE

I hereby certify that copies of "NOTICE OF SUPPLEMENTAL MOTION AND SUPPLEMENTAL MOTION TO COMPEL FURTHER ANSWERS TO INTERROGATORIES; DECLARATION of MARK S. POLLOCK" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this 7th day of February, 1981:

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Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Emmeth A. Luebke, Member
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Dr. Oscar H. Paris, Member
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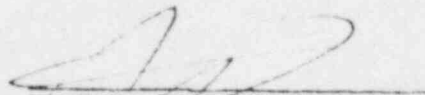
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