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May 31, 1994

OFFICE OF SECRETARY
UNITED STATESOOF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
ONCOLOGY SERVICES CORPORATION	Docket No. 030-31765-EA
(Byproduct Material License No. 37-28540-01)) EA No. 93-006

OSC'S REQUEST FOR PRODUCTION OF DOCUMENTS DATED MAY 31, 1994

OSC makes the following discovery requests. To the extent the Staff asserts that a privilege attaches to any documents requested, OSC requests that the Staff for each said document specify:

- a. The date of the document;
- b. Who the document was distributed to;
- c. The general subject matter of the document; and
- d. Where the document is presently maintained.

Document shall be defined as follows:

The use of this word is intended to refer to any material or any medium on which or by which "information" is recorded - including papers (of any kind or character), photographs, computer files, minutes and records of meetings, reports, summaries, memoranda, interoffice communication or writings by whatever name called which relate to the document(s) specifically including: (1) any material which was used in the

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preparation of any such document(s); (2) any and all attachments to such document(s); (3) any and all documents referred to in the requested "Document;" and (4) any and all subsequent additions, deletions, substitutions, amendments or modifications to the original of such "Document(s)."

- Produce any and all documents obtained by the NRC and/or created by the NRC in connection with the IIT investigation, including but not limited to, those documents produced by OSC, Omnitron and PrimeAlert.
- 2. Produce any and all documents obtained by the NRC and/or created by the NRC or in the possession of the NRC which relate in any manner to the suspension of the license of OSC.

Respectfully submitted,

Marcy L. Colkitt Pa. I.D. No. 53447

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Indiana, PA 15701-0607

(412) 463-3570

Joseph W. Klein Reed Smith Shaw & McClay 435 Sixth Avenue Pittsburgh, PA 15219

Dated: May 31, 1994

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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OFFICE OF SECRETARY DOCKETING & SERVICE

No. 37-28540-01 Docket No. 30-31765-EA

E.A. No. 93-006

BRANCH

ONCOLOGY SERVICES CORPORATION BY-PRODUCT MATERIAL LICENSE

IN THE MATTER OF:

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of OSC's Request For Production Of Documents Dated May 31, 1994 was served on the following this 31st day of May 1994, as indicated:

G. Paul Bollwerk, III, Chairman Administrative Judge Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

Dr. Charles N. Kelber Administrative Judge Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

Marian L. Zobler Michael H. Finkelstein U.S. Nuclear Regulatory Commission Office of General Counsel Washington, DC 20555 By Mail and By Fax (301-504-3725)

Atomic Safety & Licensing Board Panel (1) U.S. Nuclear Regulatory Commission Washington, DC 20555

Dr. Peter S. Lam Administrative Judge Atomic Safety & Licensing Board U.S. Nuclear Regulatory Commission Washington, DC 20555

Adjudicatory File (2) U.S. Nuclear Regulatory Commission Washington, DC 20555

Office of the Secretary (2) U.S. Nuclear Regulatory Commission Washington, DC 20555 ATTN: Docketing & Service Section

Office of Commission Appellate Adjudication (1) U.S. Nuclear Regulatory Commission Washington, DC 20555

Mary Colket

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