

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

SAFETY LIGHT CORPORATION  
UNITED STATES RADIUM CORPORATION  
USR INDUSTRIES, INC.  
USR LIGHTING, INC.  
USR CHEMICAL PRODUCTS, INC.  
USR METALS, INC.  
U.S. NATURAL RESOURCES, INC.  
LIME RIDGE INDUSTRIES, INC.  
METREAL, INC.  
(Bloomsburg Site Decontamination)

Docket Nos.: 030-05980  
030-05982  
030-05981  
030-08335  
030-08444

(ASLBP No. 89-590-01-0M)  
90-598-01-0M)

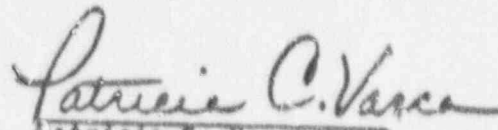
AFFIDAVIT OF PATRICIA C. VACCA

I, Patricia C. Vacca, being first duly sworn, depose and state as follows:

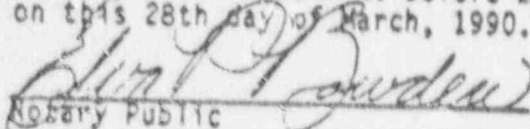
I am currently employed by the United States Nuclear Regulatory Commission (NRC) as Senior Project Manager (Health Physics) in the Medical, Academic, and Commercial Use Safety Branch, Division of Industrial and Medical Nuclear Safety, in the Office of Nuclear Material Safety and Safeguards. I have prepared responses to supplemental interrogatories 1-6.

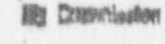
The information requested in supplemental interrogatories 1-6 is not maintained in a computer data base or other centralized file. Thus, in order to identify relevant cases, it was necessary to rely upon (1) the memory of those Regional and Headquarters staff who were in the office and had had byproduct material licensing experience and (2) those docket files that were available for review (e.g., active files that were on the shelf).

I hereby certify that the answers to the above numbered interrogatories are true and correct to the best of my knowledge and belief.

  
Patricia C. Vacca

Subscribed and sworn to before me  
on this 28th day of March, 1990.

  
Notary Public

My Commission expires:  Disposition Expires July 1, 1991

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(ASLBP No. 89-590-01-0M  
90-098-01-0M-2)

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF RESPONSE TO SUPPLEMENTAL INTERROGATORIES FILED BY USR INDUSTRIES, INC. et al" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, or as indicated by a double asterisk by use of express mail service, this 28th day of March, 1990: ("D" indicates service of documents described in response)

Christine N. Kohl, Chairman\*D  
Administrative Judge  
Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Atomic Safety and Licensing Board  
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Atomic Safety and Licensing Appeal  
Panel (5)\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

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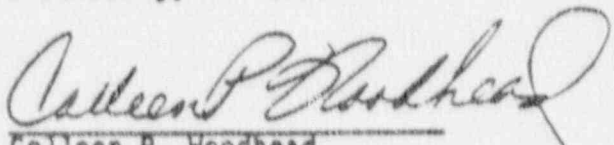
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