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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

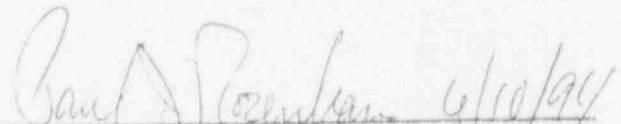
ATOMIC SAFETY AND LICENSING BOARD '94 JUN 21 AM 10:37

In the Matter of)
CAMEO DIAGNOSTIC CENTRE, INC.)
SPRINGFIELD, MASSACHUSETTS)
(Byproduct/Source Material License
No. 20-27908-01)

OFFICE OF SECRETARY
DOCKETING & SERVICE
Docket No. 030-29567-CivP
E.A. 93-005

MOTION TO EXPAND ISSUES FOR CONSIDERATION

1. In its Order Imposing Civil Monetary Penalty, NRC staff limited issues for consideration at any hearing protesting the penalty, to two issues only.
2. Nevertheless Judge Ivan W. Smith has allowed the issue of personal malice by certain NRC staff to be a legitimate factor for consideration at such a hearing.
3. In the interest of serving justice in this matter and the overall national good, Licensee proposes that the Board further allow consideration whether NRC staff in its actions after Dec. 11, 1992 effectively and with malice denied due process rights to Licensee.
4. Since accountability for actions by public officials is at the heart of our form of government, Licensee requests this motion be granted given the gravity of the issue.


Paul J. Rosenbaum, President
Cameo Diagnostic Centre, Inc

130 Maple Street
Springfield, MA. 01103
Dated June 10, 1994

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BRANCH

CERTIFICATE OF SERVICE

I hereby certify that the appended MOTION TO EXPAND ISSUES FOR CONSIDERATION has been served upon Ivan W. Smith, Administrative Judge and Catherine L. Marco, ESQ. by transmitting copy thereof via FAX on June 10, 1994.


Paul J. Rosenbaum, President

130 Maple Street
Springfield, MA. 01103
Dated June 16, 1994