



July 18, 1994

Mr. Walter Pasciak
Industrial Applications Section
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, PA 19406-1415

RE: Amendment for Radioactive Materials License Number: 20/03529/01

Mr. Pasciak:

We would like to amend our Springfield facility license to include the Plant Manager, Mr. Dave Barrow, the Assistant Plant Manager, Ms. Grace Bowen and the Production Supervisor, Mr. Philip Rumian as Condition 11A users/supervisors of licensed material. In addition, we would like to add Mr. Dave Barrow, as the Condition 11B Radiation Safety Officer. We believe that their experience qualifies them to supervise the use of and to use the types, forms, and quantities of licensed materials as may be present at the facility under the terms and conditions set forth in the Radioactive Materials License #20/0359/01.

Please review the attached resumes. If you believe that these people meet the qualifications, please revise Condition 11 of our license to include Dave Barrow, Grace Bowen, and Philip Rumian as Condition 11A users/supervisors, and Dave Barrow as the Condition 11B Radiation Safety Officer.

Because our license is under timely renewal, we request that the existing license be amended and that our application under current review be updated. Please replace the entire Appendix E in both the current license and the application under review. Replacement pages are attached to update both as well as the corresponding table of contents pages.

We request that this amendment be processed before the timely renewal. A check for \$370 is included. If you have any questions or comments, or if there is anything we can do to expedite this amendment, please contact me or Michael Bovino, Manager, Health Physics & Engineering at (413) 543-6911.

Sincerely,

Kent Anderson, Health Physicist
Interstate Nuclear Services Corp.

cc: D. Barrow, Plant Manager
M. Bovino, Manager, Health Physics and Engineering
J. Badey, Eastern Operations Manager
file

117925

JUL 27 1994

Replacement pages to update the application currently under review for
Materials License #20/03529/01.

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APPENDIX E

I. Training and Experience for Authorized Users

A. Responsibilities

Radiation safety responsibility is shared by the Manager of Health Physics and Engineering, the Plant Manager/Radiation Safety Officer, the Health Physics Technician, and the operating crew. Each individual must strive to keep his own exposure, as well as the exposure of others, as low as reasonably achievable. Individual responsibilities are outlined as follows:

1. Plant Manager/Radiation Safety Officer (RSO)

The Plant Manager/RSO is the key person at the site responsible for ensuring compliance with the requirements of the regulations and applicable license conditions. The RSO has the authority to operate the radiation safety program under the constraints of applicable regulations, license commitments, and procedures. The RSO will exercise discretion in areas not governed by these documents with concurrence of the Corporate Health Physics and Engineering staff. Following is a generic list of the RSO's responsibilities:

- a. Define and prescribe a radiation safety program for the regulated laundry facility.
- b. Ensure complete surveys and calibrations are performed on time and proper records of surveys and calibrations are maintained.
- c. Procure and maintain an adequate number of operable and properly calibrated radiation survey instruments and properly calibrated counting instruments.
- d. Perform, or cause to be performed, quarterly inventory of all sealed sources received or possessed.
- e. Schedule briefings and educational sessions to inform workers of radiological safety rules and procedures.
- f. Ensure necessary physical examinations, bioassay, etc. for all radiation workers are scheduled.

- g. With respect to dosimetry:
 - i. Perform a quarterly review of occupational exposures to radiation workers to determine that exposures are within applicable limits.
 - ii. Annually appraise each radiation worker of their annual accrued dose.
 - iii. Cause surveys to be performed to determine the cause of all overexposure so as to preclude reoccurrence.
 - iv. Supply employers of terminated radiation workers with radiation exposure records as required by regulations.
 - h. Assure that individuals working with radiation have appropriate protective devices.
 - i. Ensure that "Notice to Employees" RHF-3 and Notices of Items of Noncompliance resulting from department inspections are conspicuously posted.
 - j. Establish and cause to be maintained, an inventory control of radioisotopes to ensure inventory never exceeds possession limits.
 - k. Keep, or cause to be kept, surveys of incoming and outgoing shipments of radioactive material.
 - l. Assure that radioactive materials are disposed of properly, and that records are maintained of all radioactive wastes disposed.
 - m. Assure radioactive materials are properly secured against unauthorized removal.
 - n. Inform the Manager of Health Physics and Engineering, of any contemplated changes in equipment or variation from procedures.
2. Health Physics Technician
- a. Perform radiation and contamination surveys in accordance with the license and applicable regulations and procedures.
 - b. Perform air and wastewater measurements to assure compliance with applicable Federal and state requirements.

- c. Record the surveys performed in items a and b above on the appropriate forms or enter the information into a computer file, as applicable.
 - e. Properly package solid contaminated waste in DOT-approved shipping containers, seal, label and store as prescribed by the Radiation Safety Officer.
 - d. Assure monitoring equipment is calibrated and operating correctly.
4. Operations Crew
- a. Observe all rules regarding the control of radiation and contamination.
 - b. Maintain a clean working area, observing contamination control limits.
 - c. Report all suspected radiation or contamination incidents.
 - d. Observe the rules prohibiting eating, drinking and smoking in restricted areas.
 - e. Carry out recommendations of the Radiation Safety Officer or the Manager of Health Physics and Engineering for decontamination as well as other control measures.
4. Manager of Health Physics & Engineering
- a. Furnish consulting service on all aspects of radiation protection and engineering.
 - b. Suggest prescribed methods of decontamination.
 - c. Assure that a technically sound program of air sampling, water sampling, smear sampling and radiation monitoring is maintained.
 - d. Evaluate potential radiation and contamination problems and assure follow-up.
 - e. Evaluate the Health Physics Training Program for all employees as required.

- f. Keep the Plant Manager/RSO advised on all aspects of the decontamination laundry requiring health physics procedures or conformance with regulations.
- g. Evaluate the facility's radiation protection program at least annually. INS Corporation may elect to use an outside radiation protection consultant or INS Health Physics and Engineering personnel for health physics audits.

B. Training and Experience of Authorized Users/RSO's

Following are brief resumes of individuals responsible for various aspects of the INS Radiation Safety Program for the Springfield facility and off-site support. Individuals designated as an alternate RSO may serve in the primary RSO capacity during operations at the Springfield facility in the event that the RSO is on vacation, sick, away on business or otherwise unable to be present in the facility.

Springfield PM/RSO

David Barrow

EDUCATION:

Short Courses: Naval Nuclear Power School, Naval Nuclear Power Operational Training, Naval Engineering Laboratory Technician, Naval Radiological Controls Maintenance, Naval Industrial Radiological Maintenance, Naval Quality Assurance Inspector

EMPLOYMENT:

INS Corp. (4/94 - present) Plant Manager, Springfield, MA. Responsible for management of employees, daily operations, and personnel safety including radiation safety for the plant. Conducts training classes in radiation protection, directs maintenance of plant machinery and equipment, supervises instrument calibration and repair.

INS Corp. (1/93 - 4/94) Assistant Plant Manager, Springfield, MA. Supervises daily Health Physics measurements as necessary. Directs maintenance of plant machinery and equipment.

INS Corp. (6/92 - 1/93) Health Physics Technician, Springfield, MA. Performed health physics measurements and documentation as necessary for routine operations and shipments of radioactive material.

Bartlett Nuclear Inc. (1991 - 1992) Senior Health Physics Technician, Vermont Yankee. Coordinated Radiation Safety Permits for routine and corrective maintenance. Performed required radiation, contamination and airborne surveys.

US Navy (1987-1991) Lead Engineering Laboratory Technician, NPTU Windsor, CT. Coordinated all aspects of operations for Reactor Laboratory Division. Trained and oversaw students in daily reactor primary & secondary system operations and maintenance.

US Navy (1984-1987) Lead Engineering Laboratory Technician, U.S.S. Albuquerque. Supervised personnel in implementation of chemistry procedures and radiological controls including adjustments, minor repair, and major repair projects.

Springfield APM/ARSO

Grace Bowen

EDUCATION:

Working towards MS with over 80 credit hours, emphasis on the sciences, Asnuntuck Community College, Enfield CT.

EXPERIENCE:

INS Corp. (6/94 - present) Assistant Plant Manager, Springfield, MA. Supervises daily Health Physics measurements as necessary. Directs maintenance of plant machinery and equipment.

General Dynamics/E.B. Div (11/88 - 6/94) Senior Radiological Controls Technician, Windsor, CT. Responsible for providing and supervising the radiological controls associated with: nuclear fuel handling and movement operations; component removal/replacement operations; radioactive waste shipment operations; radioactive water operations including installation, use, and disassembly; auditing department functions and files for completeness and compliance with government requirements; and, procedural review of technical work documents. Supervised a staff of six senior health physics technicians. Safety representative for the Radiological Controls Department.

New York State Department of Health, Wadsworth Center for Labs and Research (1983 - 1988) Laboratory Technician, Albany, NY. Preparation and analysis of various media type samples for heavy metals. Analysis of samples on Perkin-Elmer equipment namely low level graphite furnace spectrophotometer (quantitative analysis of heavy metals in ppb). Responsible for upkeep and maintenance of spectrophotometer and various laboratory equipment. Developed new techniques to lower MDA for Pb, Cd, Ag and As for potable and waste water in preparation of proposed new lower EPA limits.

Production Supervisor

Philip Rumian

EDUCATION:

Navy Nuclear Power School. Specialized training in radiological controls and radiochemistry (Engineering Laboratory Technician).

AS Degree, Middlesex County College, Edison, NJ.

Short Courses: RSO Training Program (15 hours)

EXPERIENCE:

INS Corp. (2/94 - Present) Production Supervisor, Springfield, MA. Responsible for all aspects of production flow through out the facility and personnel safety.

Electric Boat Division, General Dynamics (1993 - 2/94), Senior Radiological Controls Monitor, Windsor, CT. Responsible for routine and specific work-site related radiation and contamination surveys and casualty response.

Knolls Atomic Power Laboratory (1990 - 1993), Radiological Controls Monitor, Windsor, CT. Responsible for routine and specific work-site related radiation and contamination surveys and casualty response.

INS Corp. (1985 - 1990) Assistant Plant Manager, Springfield, MA. Supervises daily Health Physics measurements as necessary. Directs maintenance of plant machinery and equipment. Trained new employees.

INS Corp. (1983 - 1985) Plant Manager, Honolulu, HI. Responsible for management of employees, daily operations, and personnel safety including radiation safety for the plant. Conducts training classes in radiation protection, directs maintenance of plant machinery and equipment, supervises instrument calibration and repair.

United States Navy, (1977 - 1983) Engineering Laboratory Technician, Various Locations. Responsible for radiological controls and chemistry associated with operation and maintenance of the propulsion plant.

Production Supervisor

Philip Rumian

EDUCATION:

Navy Nuclear Power School. Specialized training in radiological controls and radiochemistry (Engineering Laboratory Technician).

AS Degree, Middlesex County College, Edison, NJ.

Short Courses: RSO Training Program (15 hours)

EXPERIENCE:

INS Corp. (2/94 - Present) Production Supervisor, Springfield, MA. Responsible for all aspects of production flow through out the facility and personnel safety.

Electric Boat Division, General Dynamics (1993 - 2/94), Senior Radiological Controls Monitor, Windsor, CT. Responsible for routine and specific work-site related radiation and contamination surveys and casualty response.

Knolls Atomic Power Laboratory (1990 - 1993), Radiological Controls Monitor, Windsor, CT. Responsible for routine and specific work-site related radiation and contamination surveys and casualty response.

INS Corp. (1985 - 1990) Assistant Plant Manager, Springfield, MA. Supervises daily Health Physics measurements as necessary. Directs maintenance of plant machinery and equipment. Trained new employees.

INS Corp. (1983 - 1985) Plant Manager, Honolulu, HI. Responsible for management of employees, daily operations, and personnel safety including radiation safety for the plant. Conducts training classes in radiation protection, directs maintenance of plant machinery and equipment, supervises instrument calibration and repair.

United States Navy, (1977 - 1983) Engineering Laboratory Technician, Various Locations. Responsible for radiological controls and chemistry associated with operation and maintenance of the propulsion plant.

Production Supervisor

Paul Kistner

EDUCATION:

Completed course in electrical trades, (1977)

Short Courses: INS Health Physics Technician training, 30 hours, taught by INS Corporate Health Physics Staff; Operation of aerosol penetrometer, ATI INC.; Radiation worker training courses at several operating nuclear power plants.

EXPERIENCE:

INS Corp. (5/92 - Present) Production Supervisor, Springfield, MA facility. Responsible for all aspects of production flow through out the facility and personnel safety.

INS Corp. (7/91 - 5/92) Production Supervisor, Morris, IL facility. Responsible for plant safety programs and projects, driver qualifications, vehicle preventive maintenance scheduling and customer protective clothing lease tracking.

INS Corp. (1989-7/91). Assistant Plant Manager, Springfield, MA. facility. Supervise personnel during operations. Perform Health Physics measurements as necessary. Direct maintenance of plant machinery and equipment. Responsible for plant safety.

INS Corp. (1985-1989). Assistant Plant Manager, Macon, GA plant. Supervises daily Health Physics and measurements as necessary. Completes and maintains HP records. Direct maintenance of plant machinery and equipment. Responsible for personnel safety during operations.

INS Corp. (1983-1985). On-site Unit Manager. Responsible for daily operations and personnel in on-site mobile units at several locations. Performed daily health physics measurements as necessary. Maintained mobile unit's machinery and equipment. Responsible for personnel safety during operations.

Tri-State Laundries (1982-1984). On-site Coordinator. Hired and processed employees for power plant access. Responsible for daily operations and production schedule. Maintained machinery, set up and tore down mobile units. Responsible for personnel safety.

General Manager

George J. Bakevich

EDUCATION:

B.S. Mathematics major, Nuclear Engineering minor. Worcester Polytechnic Institute
M.S. Nuclear Engineering major, Univ. of Utah

EMPLOYMENT:

INS Corp. (80-present) General Manager for 13 nuclear decontamination facilities including P&L responsibility, growth of business, construction & planning of new facilities. Enforces regulatory & HP requirements suggested by the Manager of Health Physics and Engineering.

Combustion Engineering, Inc., (11/79-5/80) Manager, Nuclear Licensing, Safety & Accountability, total resp for compliance with NRC, DOT, & OSHA reg. at CE's uranium fuel fab. facility. Responsible for all licensing submittal & management of: Nuclear criticality safety, HP, industrial safety, RAM trans. & accountability, emergency preparedness. Responsible for audits of CE's oxide conversion facility in Hematite, Missouri & R & D Labs in Windsor, CT. Member of Nuclear Speakers Service.

Nuclear Licensing & Safety Supervisor (2/77-11/79) Responsible for all aspects of licensing at fuel fab. facility, including criticality safety analysis. Responsible for HP monitoring program & Industrial Safety program to assure compliance with regulations; audit of manufacturing operations & supervision of HP personnel.

Idaho National Engineering Lab., Idaho Falls, Idaho, (74-77) Criticality Safety Engineer/HP. Responsible for criticality safety evaluations (including computer analysis with KENO-IV, DOT, etc.) for unirradiated & spent fuel storage, fuel transport casks, & nuclear waste burial.

Health Physics experience at several large test reactors, including monitoring of high radiation fields & fission product contamination control. Member of Qualifications Review Committee; Completed ERDA System Safety Training (Management oversight & Risk Tree).

Eastern Ops. Mgr.

John R. Badey

EDUCATION:

BS Engineering, Drexel University

Additional Courses: Industrial Engineering, Hicks Institute. Finance for non-financial managers, Cooper Industries. Approximately 160 hours classroom instruction, INS Corporate Health Physics and Engineering Department.

EXPERIENCE:

INS Corporation (May, 1988 - present) Eastern Operations Manager. Develop and meet budget requirements. Develop and implement business objectives. Generate and approve procedures for operations. Directly supervise plant managers. Develop and maintain customer relations. Enforce all company policies and procedures. Work with Corporate Health Physics and Engineering to assure regulatory compliance.

Cooper Industries (1986 - 1988) McGraw-Edison Division. Plant Manager. Responsible for all plant operations for the Greenwood, SC plant, including accounting, material management, manufacturing, engineering, QC, data processing, and personnel.

Cooper Industries (1984 - 1986) Nicholson Saw Division. Manufacturing Manager. Responsible for directing manufacturing operation for the plant. Included manufacturing, inventory control, machinery maintenance and tool room.

Cooper Industries (1981 - 1984) Nicholson Saw and Cooper Steel. Quality Control Manager. Responsible for directing the quality control departments for both divisions. Developed new products and processes for introduction into the marketplace.

Gould-Brown Boveri (1968-1981) Quality control Supervisor/Engineer (1968-1978), Quality Control Manager (1978-1981). Responsible for the relocation and start-up of the quality control department from Philadelphia, PA to Florence, SC. Supervise the start-up of quality departments at two plants. Supervised the start-up of waste-treatment plant, obtaining necessary permits from regulatory agencies.

Mgr. HP and Engineering

Michael J. Bovino, CHP

EDUCATION:

Certified Health Physicist (Comprehensive), American Board of Health Physics, October 1989.

Master of Science in Health Physics, Department of Environmental Engineering, University of Florida, April 1984.

Bachelor of Science in Public Health, Minor in Biology, State University of New York at Cortland, May 1982.

EXPERIENCE:

INS Corporation, Springfield, Massachusetts. As Manager of the Health Physics and Engineering section, responsibilities include overall administration of a radiation safety program for over 600 radiation workers at thirteen facilities nationwide including plant audits, facility licensing, effluent monitoring, wastewater treatment, radioactive waste, regulatory interface, plant design and supervision of the Corporate Health Physics staff.

New Hampshire Yankee, Seabrook Station, Seabrook, New Hampshire (February 1989 to August 1990). As a Health Physics Instructor, responsibilities included all phases of development towards an INPO accredited Health Physics technician and Radioactive Waste/Decontamination technician training program.

Impell Corporation, (December 1986 to January 1989). As Lead of the On-site Scenario group, responsibilities included providing overall technical guidance and supervision of personnel towards the development of emergency response scenarios. Work included the development of computer applications to model radiological release pathways at Seabrook NPS.

Public Service Electric & Gas, (July 1984 to Dec 1986). As Technical Supervisor in the Salem Station Radiation Protection Department, responsibilities included supervision of Health Physics technicians, maintaining the Health Physics count room, providing operations support in the areas of dosimetry and respiratory protection, coordinating instrument calibration and repair, and providing diverse HP technical support.

Corporate Engineer

Leslie B. Case

EDUCATION:

B.S. Physics, Loyola University
M.S. Physics, University of South Carolina

Thesis: Nuclear Physics

Short Courses: Oak Ridge Associated Universities Radioisotope Laboratory, 1974; Summer session, Health Physics, Imperial College, London, England; Georgia Institute of Technology HP Certification Training course, 1971; Radiation Worker Training courses at several power companies.

EXPERIENCE:

INS Corp (9/85-pres.) Corporate Engineer. Responsible for the design of all plant modifications and new systems corporate-wide, including ALARA design modifications. Designed and supervised construction of Plastic Volume Reduction System and Automated Laundry Monitoring systems. Specifies and/or approves all radiation detection instrumentation corporate-wide. Supervises and instructs technicians performing radiation detection instrumentation calibration. INS procedure writing.

Southern Space, Inc. (1971 -9/85) Radiation Safety Officer. Responsible for the administration of radiation safety program for approximately 120 radiation workers. Designed and built Automated Monitoring Systems to assure better product quality. Experience in all areas of Nuclear Laundry operation, including licensing of facilities, operation and calibration of instrumentation, and handling of contaminated materials and waste.

Health Physicist

Kent D. Anderson

EDUCATION:

Short Courses: Management of Hazardous Waste, ASU Center for Environmental Controls; Radioactive Material Shipping and Receiving; US Navy Steam Generator School; US Navy Radiological Controls Shift Supervisor; US Navy Quality Assurance School.

EXPERIENCE:

INS Corp. (2/94 - present) - Corporate Health Physicist. Perform periodic Corporate HP audits. Assist Manager of Corporate Health Physics and Engineering in prescription and execution of radiation safety program corporate wide. Responsible for plant licensing.

INS Corporation (4/93 - 2/94) Assistant Plant Manager, Morris, IL. Supervise routine health physics and operations. Direct maintenance of plant machinery and equipment. Responsible to the plant manager.

Associated Technical Resources (ATR), Inc. (9/90 - 4/93) Responsible for sales, marketing, and technical support for chemical management services and radioactive waste processing operations.

ATR (6/89 - 8/90) Site Manager, Palo Verde Nuclear Generating Station (PVNGS). Responsible for managing operations and maintenance crews for the JGC Corporation Compactor and associated equipment.

ATR (8/88 - 6/89) Rad Waste Department Chemical Control Supervisor, PVNGS. Supervised and supported all work necessary to collect and distribute chemical data required to bring PVNGS into compliance with INPO, EPA, NFPA, OSHA and system compatibility requirements.

ATR (8/87 - 7/88) Screw Compactor operator, PVNGS. Responsible for installation, testing, procedure writing and personnel training for different types of rad waste monitoring and processing equipment.

Numanco, Inc. (12/86 - 10/87) Assistant to the Lead and System Rad Waste Engineers, Palo Verde. Primary responsibilities included: Hot Particle Control Program, modifications to laundry and waste monitors, mixed waste, and rad waste shipment quality assurance.

Numanco, Inc. (9/86 - 11/86) Foreman, Surry Station. Responsible for health physics coverage in containment during normal refueling outage.

Numanco, INC (2/84 - 9/86) Sr. Health Physics Technician, McGuire Station.

Rad Protection Engineer

Michael P. Fuller

EDUCATION:

Bachelor of Science, Computer Science,
Franklin Pierce College, N.H. June 1989.

Numerous health physics, computing, engineering, physics, chemistry,
and management courses.

EXPERIENCE:

INS Corp. (12/91 - present) Radiation Protection Engineer. Perform
periodic Corporate HP audits. Assist Manager of Corporate Health
Physics in procurement, installation and operation of new radiological
monitoring equipment. Develop written operating procedures for new
equipment.

Vermont Yankee Nuclear Power Corporation (3/81 - 11/91) Held various
nuclear power plant health physics, chemistry and training positions.

As Radwaste Assistant, managed the receipt, storage, processing,
treatment and shipment of radioactive materials and waste. Work included
training and supervision of technicians, management of schedules and
compliance with all regulations.

As Radiation Protection Assistant, drafted and approved radiation work
permits, prepared work schedules, trained technicians, developed
procedures and administered performance appraisals.

As Chemistry and Health Physics Assistant - Training Department,
developed and implemented training programs for the C&HP Department
using INPO TSD methods. Managed the University of Massachusetts
based Plato computer aided instruction system, and served as Chairman
of the New England Training Association's Technical Training
Subcommittee.

As Chemistry and Health Physics Technician, obtained and analyzed
various reactor process stream samples. Made recommendations for water
treatment. Maintained the laboratory and associated equipment.

United States Navy (1977 - 1981). Qualified and served in many positions
including Engineering Officer of the Watch, Engineering Watch
Supervisor, Engineering Laboratory Technician, and Mechanical Operator.

CONVERSATION RECORD

TIME

11:50 AM

DATE

8/8/94

TYPE

☐ VISIT

☐ CONFERENCE

☒ TELEPHONE

☐ INCOMING

☒ OUTGOING

Location of Visit/Conference:

NAME OF PERSON(S) CONTACTED OR IN CONTACT WITH YOU

Michael Bovino

ORGANIZATION (Office, dept., bureau, etc.)

INS Corp.

TELEPHONE NO.

(413) 543-6911

SUBJECT

Threaten to Abandon (20-3529-01)

ROUTING

NAME/SYMBOL

INT

SUMMARY

Left a message on Ins voice mail that we have not received a reply to a request for more information on 6/7/94 and that we were drafting a "Threaten to Abandon" letter

3:00 PM I spoke with K. Anderson. The company is deciding on how to proceed: 1) contract out to a temporary waste storage firm, 2) set up an interim waste storage firm of their own, separate from their nuclear laundry, 3) set up interim storage facilities at each of their laundries. I informed him that options 1 and 2 are waste brokers and would be licensed accordingly. He requested that I consult management to see if there were any other options.

ACTION REQUIRED

Document

NAME OF PERSON DOCUMENTING CONVERSATION

Steven Courtemanche

SIGNATURE

Steven Courtemanche

DATE

8/8/94

ACTION TAKEN

SIGNATURE

TITLE

DATE

50271-101

U.S. G.P.O. 1983-381-526/8346

CONVERSATION RECORD

OPTIONAL FORM 271 (12-76)
DEPARTMENT OF DEFENSE

OFFICIAL RECORD COPY

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U.M. 15