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RELATED CORRESPONDENCE

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OFFICE OF SECRETARY  
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UNITED STATES NUCLEAR REGULATORY COMMISSION

In The Matter Of: \* DOCKET NO. 30-16055 SP

ADVANCED MEDICAL SYSTEMS, INC. \* LICENSE NO. 34-19089-01

\* EA 86-155

\* ADVANCED MEDICAL SYSTEMS,  
INC.'S SECOND REQUEST TO  
\* INSPECT AND COPY DOCUMENTS

\*\*\*\*\*

Licensee, Advanced Medical Systems, Inc. (hereinafter referred to as "AMS"), pursuant to 10 CFR Section 2.744(a), hereby requests that The Nuclear Regulatory Commission (hereinafter referred to as "NRC"), produce and permit AMS to inspect and copy each of the documents identified herein.

It is requested that the production be made on January 5, 1987 at 10:00 a.m. in the NRC Public Document Room, 799 Roosevelt Road, Glen Ellyn, Illinois. In lieu of production at that time, this request may be satisfied by forwarding copies of the requested documents by United States mail to Wickens, Herzer & Panza Co., L.P.A., 1144 West Erie Avenue, Lorain, Ohio, 44052-1496 on or before the date requested for production.

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions are applicable to this request to inspect and copy documents.

1. As used herein "documents" mean the originals (or any copies when originals are not available), or when non-identical copies (whether different from the originals because of notes made on such copies or

LAW OFFICES  
WICKENS, HERZER  
& PANZA CO. L.P.A.  
LORAIN, OHIO

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otherwise), of writings or recordings of every kind and description whether made by hand or by mechanical, electronic, microfilm, photographic or other means, and including, but not limited to, correspondence of any kind, books, accounts, computer printouts and tapes, letters, papers, objects, photographs, microfilm, telegrams, notes, notebooks, statements, memorandum, inter-office and intra-office communications, minutes of meetings, reports, studies, tests, projections, analysis, summaries, licenses, agreements, contracts, assignments, ledgers, journals, vouchers, bank checks, cash flows, invoices, charge slips and receipts, purchase orders, financial statements, audits, inventories, profit and loss statements, balance sheets, expense account reports, working papers, work sheets, drafts, surveys, blueprints, specifications, statistical records, stenographer's notebooks, minutes, calendars, appointment books, diaries, diary notations, time sheets, itineraries, records, directives, instructions, tabulations, comments, recorded recollections, papers, sketches, designs, advertisements, newspaper articles, graphs, charts, plans, applications, authors, solicitations, proposals, bids, acceptance, annual or periodic reports, transcripts, testimony, complaints and any other written, recorded or reproduced material, in the possession, custody or control of the NRC, regardless of the source of such documents.

2. As used herein, "evidencing," "relative to," "relating to," "with respect to" or "relevant to" shall mean directly or indirectly mentioning or describing, pertaining, being connected with or reflecting upon a stated subject matter.

3. Each request shall extend to all documents which are or have been in the possession or subject to the control of the NRC, its agents or employees at any time during the period of the time covered by this request.

4. In construing this request:

(a) The singular shall include the plural and the plural shall include the singular;

(b) A masculine, feminine or neuter pronoun shall not exclude the other genders.

5. Unless otherwise stated, the "relevant period" for documents specified shall be November 2, 1979 to present.

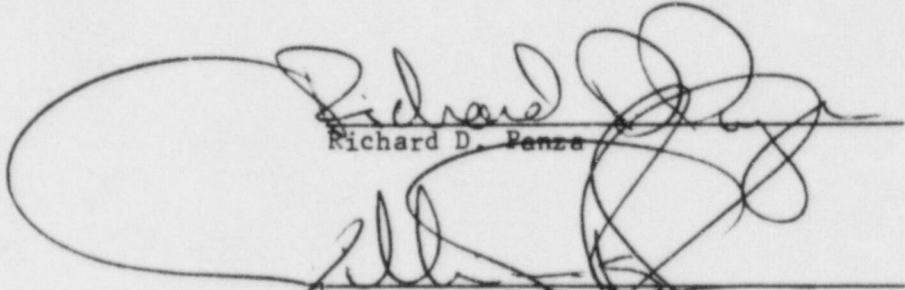
6. Privilege. If you claim privilege as to any of the documents covered by this request, identify the document by author, date and recipients of the original and all copies and specify the privilege being claimed.

7. As used herein, the terms "person" or "persons" mean natural persons, firms, partnerships, governmental entities, associations, incorporations and divisions, departments or other units thereof.


#### DOCUMENTS TO BE PRODUCED

1. Copies of all inspection reports prepared by the NRC with regard to inspections of AMS, One factory Row, Geneva, Ohio, 44041 including, but not limited to, all field notes prepared by the individuals inspecting AMS from October 10, 1984 through and including October 10, 1986.

2. All inspection reports prepared by the NRC with regard to inspections of AMS, including, but not limited to all field notes prepared by the individuals inspecting AMS from October 10, 1986 to the present.



Richard D. Panza



William F. Kolis, Jr.  
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ATTORNEYS FOR ADVANCED MEDICAL  
SYSTEMS, INC.

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PROOF OF SERVICE

The undersigned hereby certifies that a true, accurate and complete copy of the foregoing Advanced Medical Systems, Inc.'s Second Request to Inspect and Copy Documents was sent via ordinary U.S. mail, on this 1 day of ~~November~~, 1986, to:


*December*

Director,  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Regional Administrator  
NRC Region III  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Assistant General Counsel  
for Enforcement  
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Richard D. Panza