

LUIS ROBERTO SANTOS, C.S.P.

Abogados - Notarios
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Lcdo. Luis Roberto Santos Montalvo

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April 8, 2021

Mr. Randolph C. Ragland, Jr., CHP
Senior Health Physicist
Division of Nuclear Materials Safety
NRC Region I
2100 Renaissance Boulevard Suite 100
King of Prussia, PA 19426

RE: **Western Soil, Inc. Action Progress Report**

Dear Mr. Ragland:

Copy of the letter dated April 5, 2021 addressed to you by Mr. Max Laracunte on behalf of Western Soil Inc. has been referred to my law firm, who represents Western Soil Inc. in above matter.

Please be advised that on February 25th, 2021 I addressed a letter to Mr. David C. Lew, an officer of the Nuclear Regulatory Commission (exhibit A). No response was received to said letter. Said letter explains Western Soil's economic hardship made to solve the matter. Mr. Laracunte's letter explains the efforts being conducted in order to solve the matter.

Truly yours,

Luis Roberto Santos Montalvo



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*Enviada
Carta Recada 2/25/21*

return receipt requested:
7018 3090 0000 6701 8231

February 24, 2021

Mr. David C. Lew
Regional Administrator
U.S. Nuclear Regulatory Commission
Region 1
2100 Renaissance Boulevard Suite 100
King of Prussia, PA 19406-2713

RE: **Western Soil, Inc.**
NRC Inspection Report
No. 03020563/2018001

Dear Mr. Lew:

Our law firm is the legal counsel for Western Soil Inc. in reference matter.

Your letter addressed to our client on January 14, 2021 has been referred to my attention.

Please be advised that Western Soil, Inc. ceased operation on about the year 2015 due to the crisis of the construction industry in Puerto Rico. The company has not had any income from operations from said year on.

Western Soil's Inc. president Max Laracuente has tried to dispose of the equipment through a company specialized in the disposition of this type of equipment but they are requesting an upfront payment of \$10,000.00 to perform the work. Through Western Soil Inc. does not actually have the

\$10,000.00 to pay for the service its president is trying to sell other equipment in order to raise the funds to pay for the disposition of the equipment.

Our client, through its president is presently conductive efforts to:

- a) Return the equipment to the manufacturer;
- b) Retain a company who will pick up the equipment and deliver ot to the manufacturer;
- c) Negotiate with a third party who is interest in purchasing all the machines and will proceed to certify all of them.

I suggest you grant our client thirty (30) days to work on the three alternatives mentioned in the previous paragraph.

Should any questions arise, please contact us.

Truly yours,

Luis Roberto Santos Montalvo

cc. Randolph C. Fagland, Jr. CHP
Senior Health Physicist
Division of Nuclear Materials Safety
NRC Region I