

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'98 APR 20 P4:07

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

In the Matter of

CONAM INSPECTION, INC.

(Order Imposing Civil Monetary Penalty)

)
)
)
)
)

Docket No. 30-31373-CivP

ASLBP No. 98-735-01-CivP

CONAM'S MOTION TO EXTEND DISCOVERY PERIOD

Discovery in this matter is now scheduled to close on May 12, 1998, pursuant to the Licensing Board's Order. Conam Inspection, Inc. moves the Licensing Board to extend the period for discovery to and including June 1, 1998, for the following reasons.

1. On March 18, 1998, counsel for Conam Inspection, Inc. ("Conam"), was involved in a serious automobile accident, and was unable to return to work (on a part-time basis) until April 7, 1998. Since that time, counsel has been unable to work a full day, to read normal print, and unable to drive an automobile.

2. The Staff has recently issued subpoenas for the depositions of Conam's RSO, Mr. Robert Slack, and Conam's former radiographer, Mr. William Chastain, to be taken on April 21, 1998. Given his physical condition, counsel for Conam has requested of counsel for the NRC, and counsel for the NRC has agreed, to reschedule the depositions of Messrs. Slack and Chastain until May 12 and 13. At this time, counsel for Conam expects to have recovered, or alternatively, to have engaged another lawyer in his firm to conduct the necessary discovery. Counsel for the NRC has also agreed to produce the NRC witnesses for deposition during May 12-13, 1998.

SECY-EHD-006

DS03

18961

U.S. NUCLEAR REGULATORY COMMISSION
RULEMAKING & ADJUDICATIONS STAFF
OFFICE OF THE SECRETARY
OF THE COMMISSION

Document Statistics

Postmark Date 4/17/98
Copies Received 2
Add'l Copies Reproduced 0
Special Distribution RAD5

In view of the above, Conam moves the Licensing Board to extend the period for discovery to and including June 1, 1998.

Respectfully submitted,

CONAM INSPECTION, INC.



Clifton A. Lake
Counsel for Conam Inspection, Inc.

Dated at Chicago, Illinois
this 17th day of April, 1998

Clifton A. Lake
McBride Baker & Coles
500 West Madison, 40th Fl.
Chicago, IL 60661-2511
(312) 715-5700
229250

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'98 APR 20 P4:07

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
RULEMAKING AND
ADJUDICATIONS STAFF

In the Matter of)	
)	Docket No. 30-31373-CivP
CONAM INSPECTION, INC.)	
)	
(Order Imposing Civil Monetary Penalty))	ASLBP No. 98-735-01-CivP

CERTIFICATE OF SERVICE

I hereby certify that copies of **CONAM'S MOTION TO EXTEND DISCOVERY**

PERIOD in the above-captioned proceeding have been served on the following by deposit in the

United States Mail, First Class, (also via fax and e-mail where indicated) this 17th day of April,

1998.

Charles Bechhoefer, Chairman
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
e-mail: cxb2@nrc.gov

Charles A. Barth
U.S. Nuclear Regulatory Commission
Office of the General Counsel
Washington, D.C. 20555
e-mail: cab@nrc.gov

Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Fax: (301) 415-5599

Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
801 Warrenville Road
Lisle, Illinois 60532

Dr. Charles N. Kelber
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Fax: (301) 415-5599

Office of Commission Appellate Adjudication
Mail Stop: O-16 G15
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Board Panel
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Secretary (2)
Attn: Rulemakings and Adjudications Staff
Mail Stop: O-16 G15
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Adjudicatory File (2)
Atomic Safety and Licensing Board Panel
Mail Stop: T-3 F23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555



Clifton A. Lake
Counsel for Conam Inspection, Inc.

Dated: April 17, 1998