

485
RELATED CORRESPONDENCE

6/12/85

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE ADMINISTRATIVE LAW JUDGE IVAN W. SMITH

In the Matter of

REICH GEO-PHYSICAL, INCORPORATED
1019 Arlington Drive
Billings, Montana 59101

)
) License No. 25-18304-01
) Docket No. 30-14821
) ASLBP No. 85-508-01-0T
) EA 84-78

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NRC STAFF INTERROGATORIES TO REICH GEO-PHYSICAL, INC.

Pursuant to 10 CFR § 2.740b, and pursuant to the discovery schedule established by the Administrative Law Judge during a telephone conference on May 20, 1985, the NRC Staff hereby serves the following interrogatories on Reich Geo-Physical, Inc., (the Licensee). In accordance with 10 CFR § 2.740b, each interrogatory shall be answered separately and fully in writing under oath or affirmation within 14 days after service of the interrogatories. If any interrogatory is objected to, the Licensee shall state separately the objection and the reasons therefore. The Licensee may, if appropriate, answer an interrogatory by producing records, logs or other documents which provide the information requested.

1. List the dates of use and places of use for the 15.5 millicurie americium-241, 25 millicurie americium-241 and 125 millicurie cesium-137 sealed sources in the Licensee's possession for the period April 15, 1981 to June 20, 1984.

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2. State the names of any individuals, other than Keith A. Reich, who used the 15.5 millicurie americium-241, 25 millicurie americium-241 or 125 millicurie cesium-137 sealed sources in the Licensee's possession for the period April 15, 1981 to June 20, 1984.

3. For each individual identified in response to Interrogatory 2, identify the source or sources used by the individual and the dates and places of usage.

4. For each use of a source identified in response to Interrogatory 3, state whether Keith A. Reich was physically present when the source was used.

5. Describe the training provided to Terry Dowling and J. Jarocki during the period April 15, 1981 to June 20, 1984, including the dates such training was conducted, names and addresses of persons who provided the training, and the subjects covered during the training.

6. State the name and address of the manufacturer and the date of purchase and acquisition of the 15.5 millicurie americium-241, 25 millicurie americium-241, and 125 millicurie cesium-137 sealed sources in the possession of the Licensee.

7. List the dates of use and place of use for each of the survey meters (Ludlum Model #3, serial numbers 11898 and 8075) in the Licensee's possession for the period April 15, 1981 to June 20, 1984.

8. Describe any labels or markings which were present on the shipping containers of the americium-241 sources in the Licensee's possession when the sources were obtained from the manufacturer.

9. Describe the labels or marking on the shipping containers of the americium-241 sources when the Licensee transported them from its facility.

10. List the dates of transport of the americium-241 sources from the Licensee's facility for the period April 15, 1981 to June 20, 1984.

11. State the income and expenses of Reich Geo-Physical, Inc., for 1984 and the first five months of 1985.

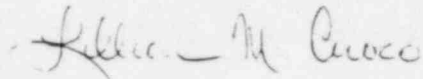
12. State the projected income and projected expenses of Reich Geo-Physical, Inc., for June 1 through December 31, 1985.

13. State the amount and source of any monies owed to Reich Geo-Physical, Inc., as of June 1, 1985.

14. State the amount, names and addresses of any creditor or creditors for any debts owed by Reich Geo-Physical, Inc., as of June 1, 1985.

15. State the amount of credit presently available to Reich Geo-Physical, Inc., and the name and address of the financial institution or institutions which have extended this credit.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Lillian M. Cuoco".

Lillian M. Cuoco
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 12th day of June, 1985

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CERTIFICATE OF SERVICE

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I hereby certify that copies of the "NRC STAFF INTERROGATORIES TO REICH GEO-PHYSICAL, INC." in the above captioned proceeding have been served on the following by express service or as indicated by a asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 12th day of June, 1985.

Keith A. Reich, President
Reich Geo-Physical, Inc.
1019 Arlington Drive
Billings, Montana 59101

Ivan W. Smith, Administrative Law
Judge
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555*

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555*

Atomic Safety and Licensing Appeal
Panel
U.S. Nuclear Regulatory Commission
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Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, DC 20555*



Lillian M. Cuoco
Counsel for NRC Staff