

DEC 05 1995

Advanced Medical Systems, Inc.
ATTN: David Cesar
Vice President
121 North Eagle Street
Geneva, OH 44041

Dear Mr. Cesar:

We have received your letter dated October 30, 1995, with attached application for renewal of License Number 34-19089-01, dated October 27, 1995. As we understand, and as stated in your letter, the application supersedes previously submitted renewal applications.

During a telephone conversation between Mr. Robert Meschter of your staff and Mr. Michael Weber of our office on November 15, 1995, Mr. Weber explained to Mr. Meschter that the NRC needs to review AMS' procedures that are referenced in the October 27 application. According to Mr. Meschter, the procedures have not yet been completed. Mr. Meschter also indicated that the procedures would be submitted to our office for review. Please note that we only want to review the final versions of the procedures. Do not submit draft copies.

It is our understanding your goal is to have the final versions completed by the end of December. Please submit the procedures for our review as soon as possible.

If your understanding of any of the above differs from ours, please contact me immediately at 708-829-9854.

Sincerely,

Original Signed By
Kevin C. Null
Senior Materials Licensing Reviewer

License No. 34-19089-01
Docket No. 030-16055

DOCUMENT NAME: M:\03016055.OTH

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures "N" = No copy

OFFICE	DNMS/RIII								
N/	KGNUL:jaw	✓							
DA	12/4/95								

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E/1117

DEC 05 1995

Advanced Medical Systems, Inc.
ATTN: Mr. David Cesar
Vice President
121 North Eagle Street
Geneva, OH 44041

Dear Mr. Cesar:

We have completed our review of your revised Trust Agreement for Advanced Medical Systems (AMS), Inc.'s financial assurance dated July 27, 1995.

Advanced Medical Systems, Inc. in Cleveland, Ohio, submitted a "modified and restated" standby trust agreement to replace one that was previously submitted to NRC. The agreement modifies a decommissioning funding plan that uses an amended letter of credit in the amount of \$1,800,000. It assures decommissioning costs for License Number 34-19089-01. Upon review of the financial assurance mechanisms, we ask that AMS modify the submission in the following way:

Submit evidence indicating that the party signing the standby trust agreement for the licensee is authorized to represent the company (Regulatory Guide 3.66, page 3-14).

The standby trust agreement, dated July 5, 1995, is signed for the licensee by its Treasurer. The submission does not, however, provide any evidence indicating that the Treasurer is authorized to enter into a standby trust agreement for the licensee, as recommended in Regulatory Guide 3.66 "Standard Format and Content of Financial Assurance Mechanisms Required for Decommissioning Under 10 CFR Parts 30, 40, 70, and 72" (June 1990), page 3-14.

In a prior submission, AMS provided such evidence in the form of a certified corporate resolution from its board of directors that granted to the Treasurer the authority to execute the standby trust agreement. That authority explicitly applied to the execution of a standby trust dated March 30, 1995, however, and does not extend to the standby trust agreement in the current submission. Evidence of authority to represent AMS is necessary to ensure the validity and enforceability of the mechanism. Therefore, please submit a copy

ELH

of the corporate by-laws or other evidence (e.g., another certified corporate resolution) indicating that the party signing the standby trust agreement is authorized to do so.

We will continue our review of your application upon receipt of this information. Please reply in duplicate, within 30 days, and refer to Control Number 00209.

If you have any questions or require clarification on any of the information stated above, you may contact us at (708) 829-9887.

Sincerely,

Original Signed By
Kevin G. Null
Licensing Reviewer

License No. 34-19089-01
Docket No. 030-16055

DOCUMENT NAME: M:\03016055.DE6

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OFFICE	DNMS/RIII									
NAME	KGNUL:jaw	11								
DATE	12/4/95									

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December 6, 1995

Advanced Medical Systems, Inc.
ATTN: David Cesar
Vice President
121 North Eagle Street
Geneva, OH 44841

Dear Mr. Cesar:

This letter refers to: (1) the matters discussed at the exit meeting between NRC and AMS on August 29, 1995, (2) the Demand for Information (DFI) subsequently issued by NRC on September 17, 1995, and (3) your response to the DFI, dated October 11, 1995.

We have completed our preliminary review of your response to the DFI, and find that we need additional information and/or clarification on several issues.

We note that your response discussed several initiatives which were not raised in the DFI. Examples of these initiatives include auditing the AMS radiation protection program and upgrading the standard operating procedures. We are encouraged by these positive initiatives.

At the exit meeting, both NRC and AMS were in agreement that definite emphasis should be placed on the reduction of the radioactive material inventory located at the AMS facility. This requires that AMS restore its hot cell to operability for inventory reduction efforts. In your response, you designated the recovery of the capabilities of the hot cell, and the subsequent reduction of sealed source and bulk cobalt 60 inventory, as intermediate priority actions, to be completed within the next one to three years in accordance with your priority scheme. We consider that a higher priority should be given to these actions. Furthermore, given the importance of the inventory reduction, we request estimated completion dates rather than the "TBD" stated in Table 3 of your response. In addition, you should describe the actions taken to date and planned, to identify a market for the sealed and bulk sources.

We also regard the training of the offsite emergency response personnel in AMS' Emergency Plan, and the subsequent emergency exercise, as high priority actions. We expect this training to take place expeditiously after NRC approves the Emergency Plan, as you stated in your response, and the exercise to follow within two months after the training is completed. Therefore, you should designate these actions as high priority actions.

Regarding Item A.2. of the DFI (offsite disposal of wastes), we consider this action to be a high priority action, given that: (1) these wastes are the only radioactive material at AMS which are in a potentially dispersible form, and (2) offsite disposal of wastes is now possible due to the recent reopening of the licensed low-level waste disposal facility at Barnwell, South Carolina. Please note that for materials licensees, NRC does not consider storage as a

substitute for disposal (see Information Notice 90-09). Low level waste should be stored only when disposal capacity is unavailable and for no longer than is necessary. The only exception to this is storage for decay, which is generally authorized for radionuclides with half-lives of 120 days or less. This issue has direct bearing on your Decommission Funding Plan, and will be addressed, with comments regarding the "Conceptual Decommissioning Plan," in a separate correspondence from Region III.

We request specific justification if the actions discussed in the above three paragraphs are not designated as high priority actions with specific schedules assigned.

Regarding Item B (inventory), we agree that the health and safety significance of reducing the inventory of sealed and bulk sources, which requires the use of the hot cell, outweighs the health and safety significance of removing the stuck plug of the hot cell's front storage well and completing the physical inventory. However, the further postponement of the removal of the plug and the subsequent completion of the physical inventory necessitates that AMS request an amendment to License Condition 14. The new completion date for the physical inventory should expeditiously follow the completion date for the reduction of the inventory of sealed and bulk sources, and must not extend past June 30, 1998, the date of the next required physical inventory.

Regarding Item D (decommissioning/decontamination of the WHUT room), your response did not address these issues. Please describe your plan of action for the decommissioning/decontamination of the WHUT room.

Regarding Item E (decontamination of the facility), in your response you state: "AMS is not operating under a decommissioning order, therefore this item is not applicable. Further, the contamination in the referenced areas is adequately controlled such that workers and members of the public do not incur 'avoidable risks' merely by its presence." As we stated in the DFI, 10 CFR 20.1101(b) requires a licensee to use, to the extent practicable, procedures and engineering controls to achieve radiation doses to workers and members of the public that are as low as is reasonably achievable (ALARA). Moreover, AMS is required, by License Condition 22, to decontaminate restricted areas if surface contamination levels exceed 40,000 disintegrations per minute per 100 square centimeters (dpm/100 cm²).¹ Consistent with ALARA principles, your plan should address steps that will be taken to further reduce contamination levels and permit a greater degree of worker safety and accessibility throughout the facility. Therefore, you should re-address this issue and describe your plan of action for the decontamination of the AMS facility.

Regarding the disposition of the 100,000 gallons of treated water, we note that this is a low priority action. Please provide us information regarding the expected long term (3-5 years) integrity of the collapsible storage tanks.

¹ Letter from S. J. Stein to NRC, dated July 23, 1990.

We also wish to inform you that the structural integrity inspection conducted by R. Shewmaker of NRC Headquarters has been completed. We will forward the complete inspection report to you as soon as it is available. The inspection revealed several concerns which may have an effect on several issues discussed in the DFI (e.g., the Emergency Plan, and the Decommissioning Funding Plan). Therefore, in your response to this letter, please address the issues discussed in the structural integrity inspection report.

A response to this letter is requested within thirty days after receiving the aforementioned structural integrity inspection report.

Questions concerning this letter should be addressed to Mr. James L. Caldwell, Deputy Director, Division of Nuclear Materials Safety, Region III, who can be reached at (708) 829-9801.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC's Public Document Room.

Sincerely,

Original signed by
Hubert J. Miller
Regional Administrator

Docket No.: 030-16055
License No.: 34-19089-01

See Attached Distribution

DOCUMENT NAME: G:\LTRS2LIC\MTLS\030\95316055.L36

* See Previous Concurrence

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OFFICE	RIII	*	RIII	*	NMSS	*	OGC	*	RIII	*	RIII
NAME	MWeber		JMadera		DCool		MZobler		JCaldwell		Miller
DATE	12/6/95		12/6/95		12/ /95		12/ /95		12/ /95		12/6/95

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revealed several concerns which may have an effect on several issues discussed in the DFI (e.g., the Emergency Plan, and the Decommissioning Funding Plan). Therefore, in your response to this letter, please address the issues discussed in the structural integrity inspection report.

A response to this letter is requested within thirty days after receiving the aforementioned structural integrity inspection report.

Questions concerning this letter should be addressed to Mr. James L. Caldwell, Deputy Director, Division of Nuclear Materials Safety, Region III, who can be reached at (708) 829-3801.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter will be placed in the NRC's Public Document Room.

Sincerely,

Hubert J. Miller
Regional Administrator

Docket No.: 030-16055
License No.: 34-19089-01

See Attached Distribution

DOCUMENT NAME: G:\LTRS2LIC\MTLS\030\95316055.L36

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OFFICE	RIII <i>Am for</i>	E	RIII <i>Am for</i>	E	NMSS	E	OGC	E	RIII <i>Am for</i>	E	RIII
NAME	MWeber:cp		JMadera		DCool		MZobler		JCaldwell		HMiller
DATE	12/5/95		12/5/95		12/4/95		12/4/95		12/5/95		12/ /95

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Distribution

Robert Meschter
Radiation Safety Officer
Advanced Medical Systems, Inc.
121 N. Eagle Street
Geneva, OH 44041

Robert E. Owen, Administrator
Department of Health
246 North High Street, 3rd Floor
P.O. Box 118
Columbus, OH 43266

Michael R. White, Mayor
City of Cleveland
601 Lakeside Avenue
Cleveland, OH 44114

Lisa Mehringer
City of Cleveland Law Department
601 Lakeside Avenue, Room 106
Cleveland, OH 44114

Erwin J. Odeal, Executive Director
Northeast Ohio Regional Sewer District
3826 Euclid Avenue
Cleveland, OH 44115

Erv Ball, Deputy Director
Cuyahoga County Board of Health
1375 Euclid Avenue, Suite 524
Cleveland, OH 44115

Michael Kalstrom, Secretary
County of Cuyahoga
Cuyahoga Emergency Management
Assistance Center
1255 Euclid Avenue, Room 102
Cleveland, OH 44115-1807

Jane Harf, Chairperson
Ohio State Emergency Response
Commission
1800 Watermark Drive
P.O. Box 163669
Columbus, OH 43216-3669

Marian Zobler
U.S. Nuclear Regulatory Commission

bcc:

C. Jones, NMSS
PUBLIC IE07
AMS File

E-mail:

Bruce Berson (BAB1)
Joe DeCicco (JXD1)
Jim Caldwell (JLC1)
Fred Combs (FCC)
Donald Cool (DAC)
Steve Crockett (SFC)

Gary Shear (GLS)
Cynthia Jones (CGJ)
Tim Johnson (TCJ)
John Madera (JRM4)
Kevin Null (KGN)
Cindy Pederson (CDP1)

Bill Brach (EWB)
Mike Stein (MHS)
Mike Weber (MFW1)
Marian Zobler (MLZ)
Bernie Bordenick (BMB)
Josie Piccone (JMP1)



Advanced Medical Systems, Inc.

1020 London Rd.
Cleveland, Ohio 44110
216-692-3270

December 6, 1995

Mr. James Caldwell
Nuclear Materials Inspection, Section 2
USNRC
801 Warrenville Rd.
Lisle, IL 60523-4351

Re: Incident/Event Report

Enclosed for your information is a copy of AMS Incident/Event Report 95-001 which outlines the details of a burglary attempt (Unusual Event) at the London Road facility on 11/26/95.

Any questions regarding the content of this report or the incident may be directed to me at (216) 692-3270.

Sincerely,

Robert Meschter, RSO

cc: David Cesar, Vice President

E/120

DEC 11 1995

ATTACHMENT 3

ADVANCED MEDICAL SYSTEMS, INC.			
INCIDENT/EVENT REPORT			
I/E Number <u>95-001</u>		Page <u>1</u> of <u>7</u>	
I/E Date: <u>11-26-95</u>	I/E Location: <u>1020 LONDON RD.</u>		
I/E Time: <u>0425</u>	Areas/Equipment Affected: <u>RESTRICTED AREA - DRUCK DOCK, NON-RAD EQUIPMENT THEFT</u>		
I/E CLASSIFICATION		EVENT TYPE	
<input type="checkbox"/> Site Area Emergency	<input type="checkbox"/> Electrical Failure	<input type="checkbox"/> Injury to Personnel Involving Contamination	
<input type="checkbox"/> Alert	<input type="checkbox"/> Water/Sewer Failure	<input type="checkbox"/> Natural Disaster	
<input checked="" type="checkbox"/> Unusual Event	<input checked="" type="checkbox"/> Security	<input type="checkbox"/> Fire	
<input type="checkbox"/> Incident	<input type="checkbox"/> Minor Spill or Release (on-site)	<input type="checkbox"/> Minor Release (off site)	
<input type="checkbox"/> Transportation Event	<input type="checkbox"/> Major Spill or Release (on-site)	<input type="checkbox"/> Major Release (off site)	
<input type="checkbox"/> Information Only	<input checked="" type="checkbox"/> Other (Describe) <u>PERPETRATOR ENTERED A RESTRICTED AREA DURING BURGLARY ATTEMPT.</u>		
<input type="checkbox"/> Other			
EVENT DESCRIPTION			
<u>see Attached.</u>			
NOTIFICATIONS			
<input checked="" type="checkbox"/> M. Kieber USNRC Region III <u>0852</u>	<input type="checkbox"/> University Hospital of Cleveland	<input checked="" type="checkbox"/> ADT Security Services <u>0425</u>	<input checked="" type="checkbox"/> S. Haddock Other <u>0425</u>
<input type="checkbox"/> USNRC Operations Center	<input type="checkbox"/> Ohio Emergency Management Agency	<input type="checkbox"/> Ohio Department of Health	<input checked="" type="checkbox"/> C. Reed Other <u>0545</u>
<input type="checkbox"/> Cleveland Fire Department	<input type="checkbox"/> Cleveland Emergency Medical Services	<input type="checkbox"/> Ohio Environmental Protection Agency	<input checked="" type="checkbox"/> R. Meschter Other <u>0700</u>
<u>322107 911</u> <input type="checkbox"/> Cleveland Police Department <u>BY S. Haddock</u>	<input type="checkbox"/> Ohio State Highway Patrol		<input checked="" type="checkbox"/> D. Cesar Other <u>0830</u>
<input type="checkbox"/> CRITIQUE HELD	IF YES, DATE/TIME:	<input type="checkbox"/> ROOT CAUSE ANALYSIS REQUIRED	
APPARENT CAUSE: <u>BREACH IN & ATTEMPTED BURGLARY</u>		IMMEDIATE CORRECTIVE ACTIONS: <u>NOTIFIED CLEV. POLICE, R50</u>	

ATTACHMENT 3 (CONTINUED)

ADVANCED MEDICAL
SYSTEMS, INC.INCIDENT/EVENT REPORT
(Continued)2 7
Page 1 of 1RTM
11-26-95

11/26/95

ADDITIONAL INFORMATION/CORRECTIVE ACTIONS/COMMITMENTS

4:25 A.M. - RECEIVED CALL FROM ADT THAT ZONE 52 HAD
BEEN BREACHED5:00 A.M. - ARRIVED ON SITE WITH ADT GUARD AND WE
ENTERED THE CONFERENCE TABLE AND NOTICED
THAT FAX MACHINE AND COMPUTER WERE MISSING5:05 A.M. - HADDOCK AND GUARD EXITED BACK OF THE BUILDING
AND WALKED OUT BY DIRT PILE. HADDOCK SAW
PERSON IN BUILDING. WE SEARCHED ROOM FOUND
NOTHING. ADT DISPATCHED FOR CLEVELAND POLICE
BACK-UP. NOTICED THAT STOLEN ARTICLES WERE
IN SW CORNER OF PARKING LOT.5:45 AM - CALLED 911 TO CHECK STATUS OF CLEVELAND
POLICE. NOTIFIED CHRIS REED OF INCIDENT
AND FOR HIM TO RESPOND6:00 AM - POLICE ARRIVE WITH 6 OFFICERS, TWO
REMAINED OUTSIDE WITH ADT TO WATCH DOORS,
FOUR OFFICERS SEARCHED BUILDING WITH HADDOCK

6:35 AM - CHRIS REED ON SITE

7:00 AM - NOTIFIED BOB MESCHTER

8:05 - BOB MESCHTER ARRIVED ON-SITE.

0805 - BOB MESCHTER ARRIVED ON SITE & RECEIVED
BRIEFING ON SITUATION - RTM DECLARED USE.

SIGNATURES

Prepared by: S. HADDOCK

Approved by (President):

Approved by (RSO):

Approved by (Other, specify):

Long-term Corrective Action Plan Approved by:

ATTACHMENT 3 (CONTINUED)

ADVANCED MEDICAL
SYSTEMS, INC.INCIDENT/EVENT REPORT
(Continued)Page 3 of 7

ADDITIONAL INFORMATION/CORRECTIVE ACTIONS/COMMITMENTS

0815 - Directed C Reed & S Haddock to perform CONTAMINATION SURVEYS OF RESTRICTED AREA ENTRANCES & EXITS (ISH, AIRLOCK, Isotope Shop Waste House Roll up & Man Door Points. No CONTAMINATION found. No breach of doors noted, no apparent access to these areas. See Attached Survey.

0830. Notified D. Cesar (AMS VP) left message on his home machine.

0852. RTM Notified M. L. Weber USNRC of U.E. due to fact that
 * Perpetrator was seen inside RESTRICTED AREA - GAS TANK STORAGE OFF TRUCK DOCK. SEE SECTION 5.5 OF ISP-37 "EMERGENCY RESPONSE & NOTIFICATIONS". Reported details to M. Weber. And since there was no loss of radioactive material. RTM report to M. Weber that unusual event was being down graded at this time.

SIGNATURE

Prepared by:

R. Mexilita
R. Mexilita

Approved by (President):

D. Cesar

Approved by (RSO):

Approved by (Other, specify):

Long term Corrective Action Plan Approved by:

ATTACHMENT 3 (CONTINUED)

ADVANCED MEDICAL
SYSTEMS, INC.INCIDENT/EVENT REPORT
(Continued)Page 4 of 7

ADDITIONAL INFORMATION/CORRECTIVE ACTIONS/COMMITMENTS

0830 TO 0900 - C. Reed secured Broken
Panel in Truck Dock Roll Up Door.

0900 - Based on Survey Results
RTM Determined THAT PERPETRATOR
Received (conservatively) $< 0.1 \text{ mR}$
of Exposure. (Based on occupancy of
 $< 1 \text{ Hour @ } 0.1 \text{ mR/h}$)

0920. C. Reed & S. Haddock searched
FIELD outside west fence for
Possible Abandoned STOLEN ARTICLES.
None found.

* Although Perpetrator not seen in Restricted
Area where contaminated DIRT is
Temporarily stored, The open Door to this
Area and the presence of the cart
used to remove items from the Building
outside this Door in the DIRT Storage
Area is Evidence THAT the Perpetrator
was in this Area. The estimated Time
used to calculate dose includes Time
in DIRT Storage Area.

SIGNATURES

Prepared by:

R. Moxley

Approved by (President):

J. Keson

Approved by (RSO)

R. Moxley

Approved by (Other, specify):

Long-term Corrective Action Plan Approved by:

ATTACHMENT 3 (CONTINUED)

ADVANCED MEDICAL
SYSTEMS, INC.INCIDENT/EVENT REPORT
(Continued)Page 5 of 8

ADDITIONAL INFORMATION/CORRECTIVE ACTIONS/COMMITMENTS

Additional Information:

Items Attempted BC STOLEN.

1 FAX MACHINE

1 COMPUTER w/DISPLAY & MOUSE.

1 PRINTER

1 UNDERWATER CAMERA + VCR.

1 BAG SUGAR

1 PACK MICROWAVE POPCORN.

1 FLASH LITE.

Items Known to be Missing.

2 CANS TUNA FISH.

1 CAN BEANS

Time Line From ADT Computer Log. ON 11-26-95

0425 POINT 58 MOTION DET. S.E. OFFICE

0427 ADT NOTIFIED CPD #96

0428 ADT NOTIFIED S. HADDOCK (ETA 30 MIN)

0429. POINT 52 AGAIN.

0430 POINT 25 N INNER DOOR

0446. POINT 52 AGAIN

0448 POINT 39. NORTH. OVERHEAD DOOR

0450 POINT 28 WEST DOCK ENTRANCE.

0458 ADT OFFICER ON SITE.

SIGNATURES

Prepared by:

R. Mersmith

Approved by (President):

J. Kesan

Approved by (RSO)

R. Mersmith

Approved by (Other, specify):

Long-term Corrective Action Plan Approved by:

ATTACHMENT 3 (CONTINUED)

ADVANCED MEDICAL
SYSTEMS, INC.INCIDENT/EVENT REPORT
(Continued)Page 6 of 7

ADDITIONAL INFORMATION/CORRECTIVE ACTIONS/COMMITMENTS

Additional info. continued.

ADT was Requested ON 11-27-95 TO COME
TO FACILITY & REVIEW / DISCUSS UPGRADES
TO BURGLAR ALARM SYST. INCIDENT TO
BE DISCUSSED BY RADIATION SAFETY
COMMITTEE.

SIGNATURES

Prepared by:

R. Merseth

Approved by (President):

VIC

J. J. Hesner

Approved by (RSO)

R. Merseth

Approved by (Other, specify):

Long-term Corrective Action Plan Approved by:

RADIOLOGICAL SURVEY REPORT

AGENT <i>L. Haddock</i> 177	S/N 56696	CAL DUE 12/26/95	RWP No. N/A	DATE 11/26/95	TIME 0530
INSTRUMENT <i>L. Haddock</i> 19	S/N 115871	CAL DUE 4/11/96	AREA Various		
INSTRUMENT	S/N	CAL DUE	PURPOSE Follow up Survey from		
INSTRUMENT	S/N	CAL DUE	Break w.		

Counter Eff. _____	Counter Bkg. _____	Counter MDC. _____
--------------------	--------------------	--------------------

- (1) } CELL OFFICE AIRLOCK ENTRANCE
- (2) }
- (3) } HIGH LEVEL STORAGE ENTRANCE
- (4) }
- (5) } COUNT ROOM AIRLOCK DOOR ENTRANCE
- (6) }
- (7) } OVERHEAD DOOR TRUCK DOCK
- (8) }
- (9) } BASEMENT ENTRANCE - CLEAN SIDE
- (10) }
- (11) } LOW LEVEL STORAGE ENTRANCE(S)
- (12) }

CONTAMINATION RESULTS IN dpm/100 cm ²			
No.	SMEAR LOCATION	CCPM	DPM
1	See Results		
2			
3			
4			
5			
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			
29			
30			

Results All smears < 1K dpm/100cm²

Dose Rates AT Truck dock Boundary 0.1 mR/hr
 DOSE RATE EXIT PATH THROUGH DIRT STORAGE 60 microR/hr
 DOSE RATES AT ISA Warehouse door 0.1 mR/hr
 & Rates near paint room where Preparation was seen was 0.1 mR/hr.
(Dose rates are in mrem/hr at approx. 3' above the floor unless otherwise noted.)

SURVEY BY (Printed) <i>C. Haddock</i> / S. Haddock	SURVEY BY (Signature) <i>C. Haddock</i> / S. Haddock	REVIEWED BY <i>R. Mearns</i>	DATE 11-77-95
---	---	---------------------------------	------------------