

10/2/02
67 FR 61932
72

It is unacceptable that the NRC is even considering this effort by an intending license applicant to manipulate the licensing procedure in its favor. The content of the white papers reveals that LES is seeking prejudgment on issue areas that have caused it trouble in the past, or on issues which are potentially problematic. The submission of these memoranda is an overt attempt on the part of LES to evade thorough public and government investigation in areas where the company knows itself to be vulnerable. The specific issues raised by LES in the white papers are themselves problematic. To restrict or exempt full consideration of such weighty matters as the comparative environmental impact of a "no action" alternative, environmental justice, the consortium's financial qualifications, anti-trust concerns, foreign control and ownership issues, and the disposition of tailings, would reduce NRC's licensing procedure to a flimsy rubber-stamp and further erode public confidence in the agency as an effective regulator. A dangerous precedent would be set if the NRC allows LES to manipulate the licensing procedure in this way. It is highly improper for the NRC to allow a potential license applicant to define the parameters of licensing considerations, in effect, calling for prejudgment in their favor. This violates NRC's own licensing regulations, undermines even the pretense of objectivity in the agency's licensing activities, and calls into question the ability of the NRC Commissioners to be a dispassionate appeals body for Atomic Safety and Licensing Board actions.

Please extend the comment period on these white papers to at least 90 days. The allotted period is insufficient, if meaningful public participation is the goal, especially given the breadth of issues dealt with in the white papers, difficulties in accessing these documents, and the level of controversy surrounding the LES proposal.

Sincerely, Laura Goldblatt 52 Riverside Drive, Apt. 15A New York, NY 10024 (h) 212-595-8999 (c) 651-503-0312

Surf the Web without missing calls! Get MSN Broadband. [Click Here](#)

Template - ADM-013

ERIOS-ADM-03
add T. Johnson
(TCJ)

Mail Envelope Properties (3DBFF4D9.7DF : 1 : 18399)

Subject:
Creation Date: 10/30/02 10:04AM
From: "Laura Goldblatt" <ran_laura@hotmail.com>

Created By: ran_laura@hotmail.com

Recipients

nrc.gov
twf4_po.TWFN_DO
DAM2 CC (Doris Mendiola)
MTL (Michael Lesar)

Post Office
twf4_po.TWFN_DO

Route
nrc.gov

Files	Size	Date & Time
Part.000	2514	
Mime.822	3274	

Options

Expiration Date: None
Priority: Standard
Reply Requested: No
Return Notification: None

Concealed Subject: No
Security: Standard