

From: "Tomi Winfree" <twinfree@mtsu.edu>
To: <mtl@nrc.gov>
Date: 10/31/02 5:31PM
Subject: Louisiana Energy Services (LES)

10/2/02
67FR 61937
101

Mr. Lesar,

Please be advised on the concerns of the citizens from Tennessee concerning the Louisiana Energy Services (LES) "white papers".

(1) It is unacceptable that the NRC is even considering this effort by an intending license applicant to manipulate the licensing procedure in its favor.

(2) 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.

(3) 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.

(4) 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.

(5) Also, request that the comment period on these white papers be extended 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.

Thank you for taking your time to review our concerns,

Tomi Winfree and the people of Tennessee

Template = ADM-013

E-RIDS = ADM-03
Add = T. Johnson (LES)

Mail Envelope Properties (3DC1AF2C.8EB : 20 : 43243)

Subject: Louisiana Energy Services (LES)
Creation Date: 10/31/02 5:33PM
From: "Tomi Winfree" <twinfree@mtsu.edu>

Created By: twinfree@mtsu.edu

Recipients

nrc.gov
twf4_po.TWFN_DO
MTL (Michael Lesar)

Post Office
twf4_po.TWFN_DO

Route
nrc.gov

Files	Size	Date & Time
MESSAGE	2229	10/31/02 05:33PM
Part.001	3081	
Mime.822	7065	

Options

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

Concealed Subject: No
Security: Standard