



SIERRA CLUB - Tennessee Chapter

November 11, 2002

Mr. Michael Lesar
Chief, Rules Review and Directives Branch
Division of Administration Services
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, DC. 20555

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RE: Louisiana Energy Services Unsolicited "White Papers"-Comments Regarding

Dear Mr. Lesar,

I am writing on behalf of the approximately 6000 members of the Tennessee Chapter of the Sierra Club. As the Chapter Conservation Chair, I urge you to ignore the unsolicited white papers submitted by the Louisiana Energy Services (LES) regarding the company's proposed uranium enrichment facility in Hartsville, TN. The NRC should view these white papers as an attempt to circumvent and short circuit the established NRC licensing policy:

The white papers cover areas that LES has experienced problems with in the past or potential problematic issues. Were the company not vulnerable in these areas, they would not have submitted these white papers in advance of the proper licensing process. These white papers amount to a blatant attempt on the part of LES to avoid a complete and thorough public and government investigation into these areas. LES is attempting to reduce the licensing process to a rubber stamp process, a mere mockery of the true public input licensing process that the licensing process should be. The issues covered in these white papers deserve full exposure to the light of public and agency scrutiny.

Were the NRC to allow the white papers submitted to manipulate the licensing process, this would set a very dangerous precedent for the future of the licensing process itself. The NRC must not allow LES to define the licensing process parameters in advance in the licensing process itself. This represents a highly unusual and improper attempt to avoid the mandated licensing process, including full public input. This would violate the NRC licensing regulations, undermine the objectivity of the agency's licensing process, and make questionable the NRC's ability to be objective in the licensing process.

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CSC = T. Johnson (TJ)

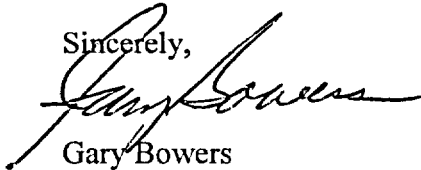


"Not blind opposition to progress, but opposition to blind progress"

In addition, the Tennessee Chapter of the Sierra Club would like to see the NRC extend the white paper comment period from 42 days to 90 days. The goal of any comment period is to receive meaningful public comment. Forty-two days is not sufficient time to allow the assessment and comment of these documents by the public.

Please consider the LES white papers a blatant attempt to undermine the NRC's licensing policy.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary Bowers". The signature is written in black ink and is positioned to the right of the word "Sincerely,".

Gary Bowers
Conservation Chair
TN Chapter-Sierra Club
3317 Timber Trail
Antioch, TN 37013