

RAS 7881



## Attorney General of New Mexico

**PATRICIA A. MADRID**  
Attorney General

**STUART M. BLUESTONE**  
Deputy Attorney General

May 25, 2004

**DOCKETED**  
**USNRC**

June 3, 2004 (9:22AM)

Secretary of the Commission  
United States Nuclear Regulatory Commission  
Attn: Rulemaking and Adjudications Staff  
Washington, D.C. 20555-0001  
Facsimile: (301) 415-1101

**OFFICE OF SECRETARY**  
**RULEMAKINGS AND**  
**ADJUDICATIONS STAFF**

Re: **In the Matter of Louisiana Energy Services, L.P. (National  
Enrichment Facility)**  
Docket No. 70-3103  
ASLBP No. 04-826-01-ML

Dear Rulemaking and Adjudications Staff:

Enclosed are the original and three copies of the Non-Disclosure Declarations for Loretta Martinez, Kate Cotner, Joella Coca, David Thomson, Claudia Ravanelli, Judith Ann Moore, Stuart Bluestone, Mary Hughes, Frances Bassett, Stephen Farris, Chris Coppin, Glenn Smith, Diana Jackson, and David Pato for filing in the above matter. The New Mexico Attorney General would appreciate it if you would kindly file, endorse and return a copy in the enclosed self-addressed, stamped envelope provided herewith.

Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "David M. Pato".

David M. Pato  
Assistant Attorney General  
New Mexico Attorney General's Office

ATTACHMENT A

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
DOCKET NO. 70-3103-ML  
NONDISCLOSURE DECLARATION

Under penalty of perjury, I hereby certify my understanding that (1) access to protected materials is provided to me pursuant to the terms and restrictions of the Atomic Safety and Licensing Board's May 21, 2004 protective order in this proceeding; (2) I have been given a copy of and have read the protective order; and (3) I agree to be bound by it. I understand that the contents of the protected materials, any notes or other memoranda, or any other form of information that copies or discloses protected materials shall not be disclosed to anyone other than in accordance with that protective order. I acknowledge that a violation of this declaration or the protective order, which incorporates the terms of this declaration, constitutes a violation of an order of the Nuclear Regulatory Commission and may result in the imposition of sanctions as the Licensing Board or the Commission may deem to be appropriate, including, but not limited to, referral of the violation to appropriate bar associations and other disciplinary authorities.

WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): Loretta S. Martinez

Title: Legal Assistant

Representing: N.M. Office of the Attorney General  
P.O. Drawer 1508 Santa Fe, NM 87504

Signature: Loretta S. Martinez

Date: 5/24/04

ATTACHMENT A

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
DOCKET NO. 70-3103-ML  
NONDISCLOSURE DECLARATION

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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *Kate Cotner*

Title: *Administrative Assistant*

Representing: *N.M. Attorney General's Office*

Signature: *Kate Cotner*

Date: *5/21/04*

ATTACHMENT A

UNITED STATES OF AMERICA  
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DOCKET NO. 70-3103-ML  
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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *Joella Coca*

Title: *Administrative Assistant*

Representing: *New Mexico Attorney General's Office*

Signature: *Joella R Coca*

Date: *5/21/04*

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Name (Printed): DAVID THOMSON

Title: Director, Litigation

Representing: STATE OF NEW MEXICO, New Mexico Atty. Gen.

Signature: 

Date: 5-21-04

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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *CLAUDIA J. RAVANELLI*

Title: *PARALEGAL.*

Representing: *New Mexico Atty General's Office*

Signature: *Claudia J. Ravanelli*

Date: *5/21/04*

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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *Judith Ann Moore*

Title: *Assistant Attorney General*

Representing: *New Mexico Attorney General*

Signature: *Judith Ann Moore*

Date: *5-21-04*

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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *STUART M. BLUESTONE*

Title: *Chief Deputy Attorney General*

Representing: *New Mexico Attorney General*

Signature: *Stuart M. Bluestone*

Date: *5/21/04*

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Name (Printed):

MARY L. Hughes

Title:

Administrative Aide

Representing:

State of New Mexico  
Patricia A. Madrid

Signature:

*Mary J. Hughes*

Date:

*May 21, 2004*

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Name (Printed):

Frances C. Bassett

Title:

Assistant Attorney General

Representing:

New Mexico Attorney General's  
Office

Signature: *J.C. Bassett*

Date: *5-21-04*

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Name (Printed): *Stephen R. Farris*

Title: *Assistant Attorney General*

Representing: *State of New Mexico*  
*Patricia A. Madrid, Attorney General*

Signature: *Stephen R. Fair*

Date: *5-21-04*

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Name (Printed): *Chris Coppin*

Title: *Assistant Attorney General*

Representing: *State of New Mexico*

Signature:

*Chris Goppin*  
Chris Goppin

Date:

5-21-04

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Name (Printed): Glenn R. Smith

Title: Deputy Attorney General

Representing: State of New Mexico,  
Patricia A. Madrid Attorney General

Signature:

*Glean R. Smith*

Date:

*5/21/04*

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Name (Printed): *DIANA JACKSON*

Title: *ADMINISTRATIVE ASSISTANT*

Representing: *ATTORNEY GENERAL PATRICIA MADRID*

Signature: *Diana Jackson*

Date: *05/24/04*

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Name (Printed): David M. Pato

Title: Assistant Attorney General

Representing: New Mexico Attorney General's Office

Signature: David M. Pato

Date: 5/21/04

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

G. Paul Bollwerk, III, Chairman  
Dr. Paul B. Abramson  
Dr. Charles N. Kelber

_____ )	
In the Matter of )	
LOUISIANA ENERGY SERVICES, L.P. )	Docket No. 70-3103-ML
(National Enrichment Facility) )	ASLBP No. 04-826-01-ML
_____ )	

CERTIFICATE OF SERVICE

I hereby certify that copies of the Non-Disclosure Declarations for Loretta Martinez, Kate Cotner, Joella Coca, David Thomson, Claudia Ravanelli, Judith Ann Moore, Stuart Bluestone, Mary Hughes, Frances Bassett, Stephen Farris, Chris Coppin, Glenn Smith, Diana Jackson, and David Pato have been served upon the following persons by electronic mail, facsimile, and/or first class U.S. mail this 25<sup>th</sup> day of May, 2004:

Office of Commission Appellate  
Adjudication  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Administrative Judge  
Paul B. Abramson  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: [pba@nrc.gov](mailto:pba@nrc.gov)

Dennis C. Dambly, Esq.  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: [dcd@nrc.gov](mailto:dcd@nrc.gov)

Administrative Judge  
G. Paul Bollwerk, III, Chair  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: [gpb@nrc.gov](mailto:gpb@nrc.gov)

Administrative Judge  
Charles N. Kelber  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mail: [cnk@nrc.gov](mailto:cnk@nrc.gov)

James R. Curtiss, Esq.  
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Washington, DC 20005-3502  
E-mail: [jcurtiss@winston.com](mailto:jcurtiss@winston.com)

Tannis Fox, Esq.  
Clay Clarke, Esq.  
Assistant General Counsel  
State of New Mexico Environment Dep't  
1190 St. Francis Drive  
Santa Fe, NM 87502-6110  
E-mail: [clay\\_clarke@nmenv.state.nm.us](mailto:clay_clarke@nmenv.state.nm.us)

Secretary of the Commission  
U.S. Nuclear Regulatory Commission  
Attn: Rulemaking & Adjudications  
Staff  
Washington, DC 20555-0001  
Facsimile: (301) 415-1101  
E-mail: [hearingdocket@nrc.gov](mailto:hearingdocket@nrc.gov)

Office of General Counsel  
U.S. Nuclear Regulatory Commission  
Attn: Assoc. Gen. Counsel for Hearings,  
Enforcement & Administration  
Washington, DC 20555-0001  
Facsimile: (301) 415-3725

Lisa Cook, Esq.  
Angela Coggins, Esq.  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
E-mails: [lbc@nrc.gov](mailto:lbc@nrc.gov)  
[ABC1@nrc.gov](mailto:ABC1@nrc.gov)

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618 Paseo de Peralta, Unit B  
Santa Fe, NM 87501  
E-mail: [lindsay@lindsaylovejoy.com](mailto:lindsay@lindsaylovejoy.com)

  
David M. Pato  
Assistant Attorney General