

From: "John Grove" <wetlands@chaffeeeco.net>
To: <nrcprep@nrc.gov>
Date: Fri, Jan 7, 2005 1:34 PM
Subject: Docket No. 70-3103

1/12/05
ROB received
cj

Chief
Rules Review and Directives Branch
Mail Stop T6-D59,
U.S. Nuclear Regulatory Commission, Washington, DC 20555-0001
Attention: Anna Bradford.

9/17/04
69 FR 56104
336

RE: Docket No. 70-3103, Addendum to previous comments:

Sirs:

I send this additional comment as an addendum to my previous written commentary, originally submitted in accordance with the December 18th comment period.

I wish to bring additional attention to the obvious paradox concerning the subject of 'security-related issues' associated with the N.E.F. project.

I find it strange that the public comment periods have been necessarily extended as a result of on-going security reviews of project documents, yet previously, broad and sweeping dismissals have been made regarding numerous security-related issues raised by myself and others concerning this proposed project.

For example, numerous questions remain regarding the proposed 'phased construction and operation' of the N.E.F. whereas no detailed information is provided regarding obvious and significant security issues associated with construction crews working in the vicinity of an operational nuclear facility. Further, the consequences of the poor track record of URENCO management in previous handling of sensitive technology information are well known, yet such concerns have been previously dismissed from consideration. With the protracted review of security information for ADAMS purposes, the NRC has implicitly raised the question of security review for the entire project. Therefore, the Agency must reverse previous dismissals, and

E-RIDS = ADM-03

SUP Review Complete
Template = ADM-013

Add A. Bradford (AHBI)
T. Johnson (TCT)

specifically respond to all security related questions raised in the process to-date.

As a matter of information regarding the general function of the public notice process, it should be noted that even as a listed stakeholder, participation in the on-going process has been 'user-hostile', i.e. the written notice I received regarding the comment period being extended to January 7th was postmarked DEC 29, 2004 from Rockville, MD. I received this stakeholder mailed notice only on Monday, January 03, 2005. Given the obvious short window in turn around notifications, I believe this final extension for such a short period of additional time was essentially useless. This final extension date essentially acknowledges the shortcomings of the process to date, but offers no functionally-effective amount of time to mitigate the damage to public participation.

Thank you for the opportunity to send comments.

John Grove

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Mail Envelope Properties (41DED643.153 : 1 : 12627)

Subject: Docket No. 70-3103
Creation Date: Thu, Jan 6, 2005 1:34 PM
From: "John Grove" <wetlands@chaffeeco.net>

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