

**JENNER & BLOCK****FOIA/PA REQUEST**

October 14, 2005

Case No.: 2006-0009  
 Date Rec'd: 10-14-05  
 Specialist: BROWN  
 Related Case: \_\_\_\_\_

Jenner & Block LLP  
 One IBM Plaza  
 Chicago, IL 60611-7603  
 Tel 312 222-9350  
 www.jenner.com

Chicago  
 Dallas  
 Washington, DC

**BY FACSIMILE AND U.S. MAIL**

U.S. Nuclear Regulatory Commission  
 Mail Stop T6-D8  
 Washington, DC 20555-0001

Edward F. Malone  
 Tel 312 923-2852  
 Fax 312 840-7252  
 emalone@jenner.com

**Re: Freedom of Information Act Request**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, I request, on behalf of my clients, Honeywell International Inc. and Honeywell Energy Services, Inc., the following documents:

1. All documents or communications of any kind from the year 1985 to present generated by or communicated to Sequoyah Fuels Corporations (SFC), whose principal place of business is I-40 and Highway 10, Gore, Oklahoma 74435, relating to any actual or anticipated monetary costs (including but not limited to cash flow projections; funding received by or through any source, budgets; financial assurance documents for decommissioning, operation or otherwise; finance plans, etc.) for maintaining or operating (in standby mode or otherwise) its uranium hexafluoride conversion facility located in Gore, Oklahoma (the "Facility").
2. All documents or communications of any kind from the year 1985 to present generated by or communicated to SFC, relating to any actual or anticipated monetary costs (including but not limited to cash flow projections; funding received by or through any source, budgets; financial assurance documents for decommissioning, operation or otherwise; finance plans, etc.) for decommissioning, reclaiming or remediating the Facility.
3. All documents or communications of any kind from the year 1985 to present generated by or communicated to General Atomics, General Atomics Energy Services, Inc. and/or General Atomics Energy Services, L.P., each having its principal place of business at 3550 General Atomics Court, San Diego, California 92121, relating to any actual or anticipated monetary costs (including but not limited to cash flow projections; funding received by or through any source, budgets; financial assurance documents for decommissioning, operation or otherwise; finance plans, etc.) for maintaining or operating (in standby mode or otherwise) the Facility.
4. All documents or communications of any kind from the year 1985 to present generated by or communicated to General Atomics, General Atomics Energy Services, Inc. and/or General Atomics Energy Services, L.P., relating to any

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- actual or anticipated monetary costs (including but not limited to cash flow projections; funding received by or through any source, budgets; financial assurance documents for decommissioning, operation or otherwise; finance plans, etc.) for decommissioning, reclaiming or remediating the Facility.
5. All documents or communications of any kind from the year 1985 to present generated by or communicated to the United States Nuclear Regulatory Commission (NRC), relating to any actual or anticipated monetary costs (including but not limited to cash flow projections; funding received by or through any source, budgets; financial assurance documents for decommissioning, operation or otherwise; finance plans, etc.) for maintaining or operating (in standby mode or otherwise) the Facility.
  6. All documents or communications of any kind from the year 1985 to present generated by or communicated to NRC, relating to any actual or anticipated monetary costs (including but not limited to cash flow projections; funding received by or through any source, budgets; financial assurance documents for decommissioning, operation or otherwise; finance plans, etc.) for decommissioning, reclaiming or remediating the Facility.
  7. All documents or communications of any kind from 1985 to present generated by or communicated to NRC, SFC, General Atomics, or Kerr-McGee, concerning any releases, injuries, property or plant damage, contamination, plant shutdowns (including the order of NRC in 1992 shutting down the Facility), outages, work stoppages, abnormal or unplanned events, enforcement actions, violations, Facility inspections, notices of violation or similar actions for the Facility.
  8. All documents or communications of any kind related to the lawsuit captioned *General Atomics v. United State Nuclear Regulatory Commission*, No. 95-55520 (9<sup>th</sup> Circuit appeal) and CV-94-1734-JNK (district court case) and or other litigation or proceedings concerning the SFC facility. Such documents shall include but not be limited to the dispute concerning the adequacy of the financial plan set forth by SFC concerning the SFC uranium hexafluoride conversion facility, the NRC's attempts to hold General Atomics responsible for the SFC facility as a "de facto" license holder, including any and all documents related to the settlement (and the funding for same) ("Settlement") of such lawsuits or proceedings, and the declarations and affidavits submitted by Mr. Neal Blue, General Atomics or SFC in connection with the lawsuit.
  9. All documents or communications relating to the SFC or General Atomics decommissioning fund for the Facility.
  10. All documents or communications regarding any commitments (oral or written) made by Neal Blue, General Atomics or SFC to obtain the License, in connection

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with the Settlement or the decommissioning of the Facility from 1988 to the present.

11. All documents or communications relating to the Facility's restart activities from 1988 to 1992, including, without limitation, all corrective action plans, plant improvements, procedure improvements, environmental improvements and cost estimates for all restart activities.

"Document" shall mean all documents and tangible things, including but not limited to all memoranda, papers, correspondence, communications, e-mails, reports, directives, computer print-outs, data contained or stored in computers and computer storage devices, tape recordings or minutes of personal conversations, summaries, records, notes, instructions, projections, tabulations, notebooks, diaries, telephone logs, calendars, travel and expense records, work sheets, receipts, vouchers, ledgers, bank records and statements, canceled checks, notes, mortgages, manuals, books, pamphlets, brochures, circulars, telegrams, cablegrams, transcripts, newspaper or magazine clippings, and every other document of any kind, including all drafts and copies.

"Communications" shall mean all inquiries, discussions, conversations, meetings, letters, notes, telegrams, advertisements, correspondence, memoranda, and other forms of oral or written intercourse.

"Relating to" shall mean constituting, consisting of, concerning, referring to, reflecting or in any way logically or factually connected with the matter discussed in whole or in part.

"Including" shall mean including but not limited to.

"Sequoyah Fuels Corporation" or "SFC" shall mean Sequoyah Fuels Corporation, whose principal place of business is I-40 and Highway 10, Gore, Oklahoma 74435, and shall include its subsidiaries, divisions, partnerships, joint ventures or other such entities, as well as its attorneys and accountants, agents, servants, consultants, contractors, associates, employees, representatives, investigators, or other persons acting on its behalf.

"General Atomics, General Atomics Energy Services, Inc." and/or "General Atomics Energy Services, L.P.," each having its principal place of business at 3550 General Atomics Court, San Diego, California 92121 (collectively, "General Atomics"), shall include their parents, subsidiaries, divisions, partnerships, joint ventures or other such entities, as well as its attorneys and accountants, agents, servants, consultants, contractors, associates, employees, representatives, investigators, or other persons acting on their behalf.

"Kerr-McGee" shall mean Kerr-McGee Corporation, whose principal place of business is at 123 Robert S. Kerr Ave., Oklahoma City, Oklahoma 73102, and shall include its subsidiaries, divisions, partnerships, joint ventures or other such entities, as well as its attorneys and accountants, agents, servants, consultants, contractors, associates, employees, representatives, investigators, or other persons acting on its behalf.

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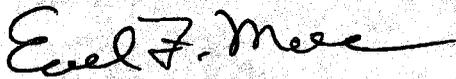
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"Neal Blue" is CEO of General Atomics.

Jenner & Block promises to pay reasonable charges associated with the search, review, and reproduction of this material. If these charges exceed \$250, please call me to approve additional charges. Time is of the essence with regard to our interest in this matter and accordingly we appreciate your attention to this request.

If you need to discuss this request, I can be reached at: phone number 312-923-2852; fax number 312-840-7252; internet [emalone@jenner.com](mailto:emalone@jenner.com).

Sincerely,



Edward F. Malone