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OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

## BY FEDERAL EXPRESS

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**In the Matter of**  
**LOUISIANA ENERGY SERVICES, L.P.**  
**(National Enrichment Facility)**  
**Docket No. 70-3103-ML**

Dear Administrative Judges:

In accordance with the Board's recent administrative directives, Louisiana Energy Services, L.P. ("LES") hereby identifies two additional exhibits in connection with its prefiled rebuttal testimony on depleted uranium deconversion and disposal-related issues. First, in Answer 6 (page 8) of LES's rebuttal testimony on deconversion cost issues, LES expert Paul Schneider testified that he had discussions with an individual at Fluor Inc. regarding the relative costs of hydrofluoric acid ("HF") conditioning/storage and HF neutralization. Those discussions

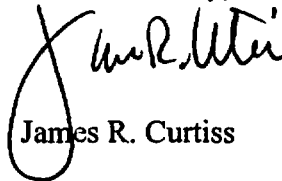
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were recently formalized and reduced to writing in a letter from John Smets of Fluor Inc. to Mr. Schneider, dated October 14, 2005. LES intends to offer that letter for admission into evidence as LES Exhibit 115. A copy of LES Exhibit 115 is enclosed, along with a revised page 8 of Mr. Schneider's rebuttal testimony that includes a reference to LES Exhibit 115.

Second, in Answer 15 (page 15) of LES's rebuttal testimony on disposal-related issues, LES witness Thomas Potter incorporated in his response certain effective radiation dose coefficients from ICRP Publication 72, "Age-Dependent Doses to Members of the Public from Intake of Radionuclides: Part 5 -- Compilation of Ingestion and Inhalation Dose Coefficients," *Annals of the ICRP* (1996). LES intends to offer the specific pages relied upon by Mr. Potter as LES Exhibit 116. Accordingly, a copy of LES Exhibit 116, and a revised page 15 referencing that exhibit, are enclosed.

Also enclosed is an updated LES Exhibit List.

Yours sincerely,



James R. Curtiss

Enclosures: As stated

cc: Lisa Clark, Esq. (w/enclosures)  
Lindsay Lovejoy, Jr., Esq. (w/enclosures)  
Office of the Secretary (w/enclosures)

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**LES Hearing Exhibits**

<b>LES Exh. #</b>	<b>Witness/ Panel</b>	<b>Description</b>
81	Deconversion	NUREG-1520, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility" (Mar. 2002), Chapter 10 ("Decommissioning")
82	Deconversion	NUREG-1757, "Consolidated NMSS Decommissioning Guidance" (Sept. 2003), Volume 3 ("Financial Assurance, Recordkeeping, and Timeliness"), pp. iii, 4-1 to 4-11, A-25 to A-30
83	Deconversion	National Enrichment Facility Safety Analysis Report, Chapter 10 ("Decommissioning") (most current revision).
84	Deconversion	NEF #05-001, "Subject: Response to NRC Request for Additional Information Regarding Depleted Uranium Hexafluoride Disposition Costs (Jan. 7, 2005), Cover Letter & Attach. 1 (pp. 1-3, 6) only. [LES-05306 to LES-05311; LES-05314] [ADAMS Access. No. ML050130145]
85	Deconversion	Letter from Paul M. Golan (U.S. Department of Energy) to Rod Krich (Louisiana Energy Services, L.P.) ("LES") (Mar. 1, 2005) [LES-05476 to -05477] [ADAMS Access. No. ML050960429 (Attach. 4)]
86	Deconversion	E. Meek, D. Gallway, D. Gray, & G. Westerbeck, <i>An Analysis of DOE's Cost to Dispose of DUF<sub>6</sub></i> , Report DE523T1, prepared for DOE by LMI Government Consulting) (Dec. 2004) [LES-PRO-01275 to LES-PRO-01297] [PROPRIETARY]

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**LES Hearing Exhibits**

<b>LES Exh. #</b>	<b>Witness/ Panel</b>	<b>Description</b>
87	Deconversion	NEF #05-030, "Subject: Response to NRC Request for Additional Information on Depleted Uranium Disposition Costs and Application for Withholding Information from Public Disclosure" (Aug. 12, 2005) [LES-06006 to LES-06009], with Enclosure "Louisiana Energy Services, L.P. Response to the NRC Request for Additional Information on U.S. Department of Energy Depleted Uranium Disposition Cost Estimate" [LES-PRO-01299 to LES-PRO-01313] [PROPRIETARY]
88	Deconversion	"Memorandum of Understanding Between Louisiana Energy Services, L.P. and AREVA Enterprises, Inc." (Jan. 21, 2005) [LES-PRO-00750 to -00754] [PROPRIETARY]
89	Deconversion	Letter from Chris Chater (Urenco Limited) to Brigitte LeMotais (COGEMA) (May 10, 2004) [LES-PRO-00628 to LES-PRO-00630] [PROPRIETARY]
90	Deconversion	Letter from Brigitte LeMotais (COGEMA) to Chris Chater (Urenco Limited) (June 21, 2004) [LES-PRO-00605 to -00621] [PROPRIETARY]
91	Deconversion	Urenco Business Study (Aug. 26, 2004) [LES-PRO-00631 to -00646] [PROPRIETARY]
92	Deconversion	"Estimated Costs for Deconversion of DUF <sub>6</sub> Using a Private Facility" (undated) [LES-05301 to -05302]
93	Deconversion	Untitled summary regarding preparation of LES commercial cost estimate, prepared for a meeting with NRC Staff at LES offices in Washington, D.C. (Apr. 19, 2005) [LES-06005]
94	Deconversion	Urenco meeting notes for July 7, 2004 meeting, prepared by Paul J C Harding (Urenco Capenhurst Limited) (July 14, 2005) [LES-PRO-00622 to -00627] [PROPRIETARY]

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<b>LES Exh. #</b>	<b>Witness/ Panel</b>	<b>Description</b>
95	Deconversion	Urenco telephone summary notes, prepared by Chris Chater (Urenco Limited) (Aug. 16, 2004) [LES-PRO-00593 to -00594] [PROPRIETARY]
96	Deconversion	NEF #05-016, "Subject: Clarifying Information Related to Depleted UF <sub>6</sub> Disposition Costs and Request for License Condition," Cover Letter & Enclosure only ( <i>i.e.</i> , attachments identified in this list as separate exhibits) (Mar. 29, 2005) [LES-05462 to -05466] [ADAMS Access. No. ML050960429]
97	Deconversion	E-mail from Rod Krich (LES) to James Curtiss (Winston & Strawn LLP) (Nov. 21, 2004), with Attachment, "CaF <sub>2</sub> Disposal Option, prepared by George Harper, Framatome-ANP (Nov. 19, 2004) [LES-05297 to - 05300] [ADAMS Access. No. ML050960429 (Attach. 1)] ;
98	Transportation Cost	E-mail from Rod Fisk (Transportation Logistics International, Inc) to Rod Krich (LES) (Dec. 2, 2004) [LES-PRO-00776] [PROPRIETARY]
99	Transportation Cost	E-mail from Rod Fisk (Transportation Logistics International, Inc) to Rod Krich (LES) (Mar. 23, 2005) [LES-05474] [ADAMS Access. No. ML050960429] (Attach. 3)]
100	Transportation Cost	Excerpts from official company website of Transportation Logistics International, Inc., printed from <a href="http://www.tliusa.com">http://www.tliusa.com</a>
101	Disposal	10 C.F.R. Part 61, "Licensing Requirements for Land Disposal of Radioactive Waste" (2005)

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**LES Hearing Exhibits**

<b>LES Exh. #</b>	<b>Witness/ Panel</b>	<b>Description</b>
102	Disposal	"Activity Concentrations of Materials Placed in WIPP Through September 2002 and Comparison to the Activity Concentration of Depleted Uranium," prepared by Thomas E. Potter (Sept. 2005) [LES-06013 to LES-06015]
103	Disposal	Letter from Al Rafati (Envirocare of Utah, LLC) to E. James Ferland (LES) (February 3, 2005) [LES-05319] [ADAMS Access. No. ML050960429] (Attach. 2)]
104	Disposal	Memorandum from Matthew Blevins (NRC) to Scott Flanders (NRC), "Subject: Telephone Summary Regarding Depleted Uranium Disposal" ,with attached Telephone Summary (Apr. 6, 2005) [ADAMS Access. No. ML050770583]
105	Disposal	Memorandum of Agreement Between Louisiana Energy Services, L.P. and Waste Control Specialists, LLC" (Jan. 14, 2005) [LES-PRO-00779 to LES-PRO-00783] [PROPRIETARY]
106	Disposal	Handwritten notes of telephone conversation between Leo Lessard (Framatome-ANP) and J. Harrison (Envirocare) (Dec. 30, 2002) [LES-02075]
107	Disposal	NEF#04-052, "Subject: Response to NRC Request for Additional Information Regarding Decommissioning Funding Plan," Cover Letter & pp. 1,2 & 5 (Dec. 10, 2004) [ADAMS Access. No. ML043560369]
108	Disposal	Excerpt from the Department of Energy's website on DUF <sub>6</sub> Management, printed from <a href="http://web.ead.anl.gov/uranium/faq/mgmt/faq27.cfm">http://web.ead.anl.gov/uranium/faq/mgmt/faq27.cfm</a>

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**LES Hearing Exhibits**

<b>LES Exh. #</b>	<b>Witness/ Panel</b>	<b>Description</b>
109	Disposal	Section 4.13 of the NEF Environmental Report, "Waste Management Impacts" (most current revision) (nonproprietary)
110	Transportation Cost	10-6-05 Letter to Rod Krich from Rod Fisk, TLI, re cost figures <b>PROPRIETARY</b>
111	Disposal	2-27-87 Federal Register Notice, 52 FR 5992, 10 CFR Part 60, Advanced notice of proposed rulemaking
112	Disposal	NUREG-0945, Vol. 1, Final Environmental Impact Statement on 10 CFR Part 61 "Licensing Requirements for Land Disposal of Radioactive Waste," Nov. 1982
113	Disposal	DOE Response to Comments, re disposal (Depleted UF <sub>6</sub> Final PEIS, p. 3-171)
114	Disposal	DOE Response to Comments, re disposal (Depleted UF <sub>6</sub> Final PEIS, p. 3-142)
115	Deconversion	10-14-05 Letter to Paul Schneider from John Smets re relative costs of HF Disposition Options
116	Disposal	Excerpts from ICRP Publication 72, "Age-dependent Doses to Members of the Public from Intake of Radionuclides: Part 5 Compilation of Ingestion and Inhalation Dose Coefficients," <i>Annals of the ICRP</i> , 1996

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**LES Hearing Exhibits**

**PREVIOUSLY ADMITTED LES EXHIBITS UPON WHICH LES INTENDS TO RELY IN THE OCTOBER 2005  
EVIDENTIARY HEARING ON DEPLETED URANIUM DISPOSITIONING ISSUES**

<b>Party Exh. #</b>	<b>Witness/ Panel</b>	<b>Description</b>
16	Deconversion & Disposal	"Construction and Operation of a Depleted Uranium Hexafluoride Conversion Facility at the Portsmouth, Ohio Site" (DOE/EIS-0360), Vol. 1
17	Deconversion & Disposal	"Construction and Operation of a Depleted Uranium Hexafluoride Conversion Facility at the Paducah, Kentucky, Site" (DOE/EIS-0359), Vol. 1
18	Deconversion & Disposal	"Final Programmatic Environmental Impact Statement for Alternative Strategies for the Long-Term Management and Use of Depleted Uranium Hexafluoride" (DOE/EIS-0269), Vols. 1 and 2
76	Deconversion	Slide, AREVA-COGEMA, "Defluorination of Depleted UF <sub>6</sub> – The W defluorination facility" (Sept. 26, 2004)
77	Deconversion	Letter from V. Autry, Director of Division of Waste Management, Bureau of Land and Waste Management, South Carolina Department of Health and Environmental Control, to L. Garner, Regulatory Affairs Coordinator, Starmet CMI (Apr. 1, 1999)
78	Deconversion	Letter from V. Autry, Director of Division of Waste Management, Bureau of Land and Waste Management, South Carolina Department of Health and Environmental Control, to L. Garner, Regulatory Affairs Coordinator, Starmet CMI (June 17, 1999)