

RAS 11774

June 6, 2006

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION**

**DOCKETED
USNRC**

June 7, 2006 (7:50am)

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

**OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF**

In the Matter of

Docket No. 70-3103

Louisiana Energy Services, L.P.
National Enrichment Facility

ASLBP No. 04-826-01-ML

**RESPONSE ON BEHALF OF
NUCLEAR INFORMATION AND RESOURCE SERVICE AND PUBLIC CITIZEN
TO BOARD REQUEST CONCERNING CROSS EXAMINATION PLANS**

This Response is submitted on behalf of Intervenors Nuclear Information and Resource Service and Public Citizen ("NIRS/PC"), in answer to the Memorandum and Order (Review of Cross-Examination Plans) dated May 31, 2006, requesting review of cross-examination plans submitted in connection with the October 2005 and February 2006 evidentiary hearings.

NIRS/PC have reviewed the cross-examination plans submitted on their behalf on October 18, 2005 and February 6, 2006 and can report that they do not believe that those plans contain material deemed proprietary under orders entered in this case.

Respectfully submitted,

/s/

Lindsay A. Lovejoy, Jr.
618 Paseo de Peralta, Unit B
Santa Fe, NM 87501
(505) 983-1800
(505) 983-0036 (facsimile)
E-mail: lindsay@lindsaylovejoy.com

Counsel for Petitioners
Nuclear Information and Resource Service
6930 Carroll Avenue, Suite 340
Takoma Park, MD 20912
(301) 270-6477

and

Public Citizen
1600 20th St., N.W.
Washington, D.C. 20009
(202) 588-1000

June 6, 2006

CERTIFICATE OF SERVICE

Pursuant to 10 CFR § 2.305 the undersigned attorney of record certifies that on June 6, 2005, the foregoing Response on behalf of Nuclear Information and Resource Service and Public Citizen to Board Request concerning Cross-examination Plans was served electronically and by first class mail upon the following:

G. Paul Bollwerk, III
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
e-mail: gpb@nrc.gov

Dr. Paul B. Abramson
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
e-mail: pba@nrc.gov

Dr. Charles N. Kelber
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
e-mail: CKelber@att.net

James R. Curtiss, Esq.
David A. Repka, Esq.
Martin J. O'Neill, Esq.
Winston & Strawn
1700 K St., N.W.
Washington, D.C. 20006
e-mail: jcurtiss@winston.com
drepka@winston.com
moneill@winston.com

John W. Lawrence, Esq.
National Enrichment Facility
100 Sun Avenue, N.E.
Albuquerque, NM 87109
e-mail: jlawrence@nefnm.com

Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attention: Associate General Counsel for Hearings, Enforcement, and Administration
e-mail: OGCMailCenter@nrc.gov
lbc@nrc.gov
abc1@nrc.gov
jth@nrc.gov
dmr1@nrc.gov
dac3@nrc.gov

Office of Commission Appellate Adjudication
Mail Stop O-16C1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001
Attention: Rulemakings and Adjudications Staff (original and two copies)
e-mail: hearingdocket@nrc.gov



Lindsay A. Lovejoy, Jr.
618 Paseo de Peralta, Unit B
Santa Fe, NM 87501
(505) 983-1800
(505) 983-0036 (facsimile)
e-mail: lindsay@lindsaylovejoy.com