

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

Before Administrative Judges:

G. Paul Bollwerk, III, Chairman  
Dr. Kaye D. Lathrop  
Dr. Craig M. White

In the Matter of

AREVA ENRICHMENT SERVICES, LLC

(Eagle Rock Enrichment Facility)

Docket No. 70-7015-ML

ASLBP No. 10-899-02-ML-BD01

December 17, 2010

MEMORANDUM AND ORDER

(Providing Presentation Topics and Administrative Directives  
Associated with Mandatory Hearing on Safety Matters)

In this proceeding concerning the 10 C.F.R. Part 70 application of AREVA Enrichment Services, LLC, (AES) for authority to construct and operate the proposed Eagle Rock Enrichment Facility (EREF) in Bonneville County, Idaho, in accord with the Licensing Board's October 7, 2010 initial general schedule for this proceeding, the Board will conduct a mandatory hearing on safety matters as follows:

Dates: Tuesday through Thursday, January 25-27, 2011  
Time: Beginning at 10:00 a.m. Eastern Time (ET) (first day)<sup>1</sup>  
Location: Licensing Board Panel Hearing Room  
Room T-3B45, Two White Flint North Building  
11545 Rockville Pike, Rockville, Maryland

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<sup>1</sup> This starting time reflects the fact the proceeding will be available via webstreaming for viewing by interested persons, including those in Idaho in the vicinity of the EREF. Although the Board contemplates finishing by approximately 6:00 p.m. ET each day, the schedule for convening and recessing each hearing session is subject to the progress made during the previous hearing sessions as well as any Washington, D.C. area winter weather-related issues.

Also pursuant to that schedule, in this issuance the Board specifies the topics for evidentiary presentations by the NRC staff and applicant AREVA Enrichment Services, LLC, (AES) and provides administrative directives relating to the January 2011 hearing.

A. Presentation Topics

1. Site-Specific Process-Related Hazards

In its December 13, 2010 answer to Publicly-Available Question 28, AES indicated that it sought to identify locality-specific safety hazards, including process-related hazards, for the EREF relative to centrifuges at European sites or at the Louisiana Energy Services (LES) site. See [AES] Response to Supplemental Publicly-Available Questions on the Safety Evaluation Report [(SER)] (Dec. 13, 2010) at 6-7 [hereinafter AES Response to Supplemental Questions]. Please prepare a presentation that discusses (a) the methodology used to identify any potential site-specific process-related hazards at the EREF relative to centrifuges at European sites or the LES site; (b) the potential site-specific process-related hazards, and the underlying site differences that could create those hazards, that were identified for the EREF relative to the European or LES centrifuges; and (c) why those potential process-related hazards were determined not to be safety-significant, including an explanation of how the systems at the proposed EREF will accommodate the site-specific differences that were identified as creating the potential hazards.

2. Foreign Ownership and Control

AES is part of the French public multinational industrial conglomerate AREVA SA, raising questions about AES compliance with the provisions of the Atomic Energy Act (AEA) and implementing NRC regulations regarding foreign ownership and control of entities that construct and operate nuclear facilities in the United States. Please prepare a presentation describing:

- a. The statutory and regulatory framework regarding foreign ownership and control of uranium enrichment facilities such as the EREF, including a description of how that regulatory scheme compares to that applicable to power reactor facilities constructed and operated under 10 C.F.R. Parts 50, 52.
  - b. The potential effects foreign ownership could have on the ability of an entity like AES to meet its safety, environmental, financial, and security responsibilities and how the management and financial structure of AES relative to AREVA SA provides AES with appropriate management and financial independence, including a discussion addressing the following questions:
    - i. Can financial difficulties of the parent corporation result in truncation or termination of the EREF project or, conversely, if AES cannot otherwise obtain necessary funding, will the parent corporation supply such capital?
    - ii. How does AES management and AES financial and operational structure differ from that of a typical United States corporate subsidiary of a foreign company in an instance when there are no statutory or regulatory controls on foreign ownership such as exist under the AEA and NRC regulations?
3. License Conditions/Exemptions

In its November 19, 2010 answer to Publicly-Available Question 26, the staff has provided a listing of the conditions/exemptions that are to be applicable to any 10 C.F.R. Part 70 license that might be issued to AES for the Eagle Rock Enrichment Facility (EREF), which are characterized as falling into a dozen different categories. See NRC Staff Response to the Licensing Board's Initial Publicly-Available Questions Regarding Safety Matters (Nov. 19, 2010) at 28-36 [Staff Publicly-Available Answers]. Please prepare a presentation that (a) outlines the reason(s) why each of these license conditions/exemptions is needed; and (b) as applicable,

explains any differences that may exist between these license conditions/exemptions and the provisions of the current LES Part 70 license for the National Enrichment Facility (NEF) and any exemptions granted relative to the LES license.

4. Commitment Followup/Tracking

The staff's answer to Publicly-Available Question 2 outlines the process of construction inspections and operational readiness reviews used to ensure that AES satisfactorily meets all the commitments made in its safety analysis report (SAR) and integrated safety analysis (ISA) as the facility is constructed and prepared for operation. See Staff Publicly-Available Answers at 7-10. Please prepare a presentation describing the full scope of this commitment followup/tracking process, including the satisfaction of license conditions, using examples from the NEF commitment followup/tracking process as appropriate to illustrate how it is anticipated that process will work for the EREF. In particular, describe:

- a. Management structure and responsibilities under the process;
- b. Approximate number of individuals engaged in the effort;
- c. Planning for the process;
- d. Requirements and training for inspectors relative to the process;
- e. Estimated time schedule for completing the process, particularly as compared to the NEF process;
- f. Coordination of the process with AES;
- g. Methodology for compiling and updating the checklist of commitments;
- h. Process for resolving disputes with AES regarding satisfactory commitment completion; and
- i. Lessons learned from the process used at the NEF.

B. Additional Board Questions on Financial Assurance

Relative to the matter of financial assurance that was addressed in the staff's response to Publicly-Available Question 9, see Staff Publicly-Available Answers at 16-18, although the Board contemplated requesting a presentation on this subject, it has concluded that its additional questions in this area can most efficiently be addressed by a supplemental evidentiary submission by one or both of the parties that covers the following inquiries:

1. Regarding the letters of credit (LOC) that will be obtained by AES to provide financial assurance per the requirements in 10 C.F.R. §§ 30.35(f)(2), 40.36(e)(2), 70.25(f)(2), it is the Board's understanding that it would be the typical commercial practice relative to an LOC to at least specify the minimum capitalization and credit ratings for an acceptable LOC issuer. Are such specifications required for the AES LOC and if not, why not?
2. To the degree that AES has committed to a "forward looking" approach to financial assurance as it relates to facility decommissioning and depleted uranium (DU) disposition, see Office of Nuclear Materials Safety and Safeguards, U.S. Nuclear Regulatory Comm'n (NRC), NUREG-1951, [SER] for the [EREF] in Bonneville, County, Idaho at 10-7 (Sept. 2010) (ADAMS Accession No. ML102710296) [hereinafter SER], with respect to the annual updated cost estimate, will the new LOC designed to cover that updated estimate encompass the estimated maximum future cost of the following one-year period?
3. If the LOC is not renewed at some point, how will the staff preserve the status quo regarding decommissioning costs to ensure that the amount of the LOC that the NRC holds (and can draw on) will be a sufficient amount to cover all

decommissioning expenses? Also, does the staff have a contingency plan if the Department of Energy cannot (or will not) take the EREF's DU?

4. The cost estimate methodology used by AES and approved by staff, as described in the SER at 10-12 to -13, appears to rely upon European enrichment facility data. How were those estimates adapted to United States market conditions (e.g., labor, materials, transportation, etc.)?

The answers to these questions should be filed on or before Friday, January 14, 2011, in conformity with the protocols set forth in section C.14 below regarding resubmission of the parties' answers to the Board's prehearing questions, and supporting material.

C. Administrative Directives

The following directives are intended to provide AES and the staff with guidance on a variety of administrative matters associated with the January 2011 hearing:

1. Time for Filing Evidentiary Materials Supporting Party Presentations

Because there are no interested governmental entities participating in this phase of the proceeding, the Board will provide the parties with additional time, i.e., up to and including Friday, January 14, 2011, within which to submit their presentation slides and other evidentiary materials relating to their presentations. This also would be the deadline for the resubmission of the parties' answers to the Board's prehearing questions, and supporting material, in accord with section C.14 below.

2. Lead/Non-Lead Parties for Presentations

Relative to each of the requested mandatory hearing presentations, the Board contemplates there will be a "lead" party that would make the initial presentation on the topic. This designation would not, however, preclude the non-lead party from making an additional,

supplemental presentation on the topic or, in lieu of a supplemental presentation, making one or more witnesses available to answer any questions the Board might pose regarding the topic.

In this regard, after consultation with the other mandatory hearing party, on or before Friday, January 7, 2010, either applicant AES or the staff should provide a filing indicating (a) which party will be taking the lead on each of the presentation topics designated by the Board; (b) whether there will be any supplemental presentation by the non-lead party as to each designated topic; (c) relative to each of the designated topics, a preliminary estimate as to how long each lead party and non-lead party presentation will take and how many witnesses will be involved in each lead party and non-lead party presentation; (d) in accord with section C.3 below, information regarding witness availability; and (e) whether any lead or supplemental presentation will involve the discussion of proprietary/sensitive information that would require any portion of the mandatory hearing to be closed to the public. Although section A above reflects the Board's current preference for the order of the presentation topics, once the Board has had a chance to review this information, it will provide a final schedule outlining the order of the presentations for the mandatory hearing on safety matters.

3. Designation and Availability of Lead/Non-Lead Party Witnesses for Presentations

Relative to any witness that is proffered by either a lead or a non-lead party in connection with a particular topic, the Board would anticipate relative to each presentation topic that at the time presentation materials are filed (i.e., on or before January 14, 2011), each party will provide a list of its witnesses for that topic as well as make available a resume/statement of professional qualifications for each witness that should be marked as a prefiled exhibit in accordance with paragraph C.6 below.

Because of the uncertainties inherent in attempting to predict the time required for litigation, the parties should be prepared to have their respective witnesses available for the

entirety of the January 25-27, 2011 period, unless they advise the Board in the context of their responses to the items set forth in section C.2 above that there is some limitation on the availability of a planned witness relative to a particular presentation topic. In addition, the parties should plan for the possibility that one or more hearing sessions might extend into the evening if such an extension would facilitate completing any portion of the mandatory hearing.

Also for planning purposes, the parties should be aware that in an effort to provide the Board with access to the fullest range of views associated with a particular issue, the Board likely will seat and swear in all the staff and AES witnesses for a particular topic prior to the lead party's presentation. This will provide the Board with the opportunity to seek the views of staff or AES witnesses regarding the responses to any Board questions directed to the other party's witnesses.

#### 4. Marking Presentation Evidentiary Materials

For this mandatory hearing, the Board intends to utilize the Digital Data Management System (DDMS) for the purpose of marking and displaying exhibits for the evidentiary record.<sup>2</sup> As such, assuming that the exhibits they submit are properly prefiled using the agency's E-Filing system, see infra section C.5, it should not be necessary for the parties to provide the Board or counsel for the other party with any paper copies of their prefiled evidentiary materials.

Additionally, while the format for this mandatory hearing does not generally contemplate the provision of additional "rebuttal" material during the evidentiary hearing, if any of the parties has documentary material that it does not wish to provide in support of its direct presentation but nonetheless contemplates might become relevant in the context of Board questioning of any

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<sup>2</sup> By using the DDMS, the Board will be able to mark each prefiled exhibit electronically to indicate whether the exhibit was identified and admitted/rejected. Likewise, shortly after the hearing is concluded, the parties should be able to verify the status of an exhibit utilized in the mandatory hearing via the information available on the agency's electronic hearing docket.

of the witnesses, it should ensure that it has that material available in the hearing room and appropriately marked both electronically (in a PDF format that complies with the agency's E-Filing guidance) and via hard copy with enough paper copies to provide to counsel for the other party, the three Board members, and the Board's law clerk. The same would be true for any exhibit that a party finds it needs to revise during a hearing session.

#### 5. Filing and Admitting Presentation Evidentiary Materials

All exhibits that the parties wish to have in the record to support their presentations must be prefiled via the agency's E-Filing system in accordance with 10 C.F.R. § 2.304(g), which states that each individual exhibit shall be submitted as an individual file. Any prefiled exhibit that contains confidential or sensitive information should be filed separately in the agency's E-Filing system using the "protective order" filing option and should include appropriate page markings.<sup>3</sup>

In the context of the evidentiary hearings for this proceeding, with the exception of the prehearing answer materials discussed in section C.14 below, the Board generally does not anticipate accepting into evidence any documentary material that is not cited or discussed in support of a party's lead or supplemental presentation. Moreover, the citations or discussion in presentations of documentary material (other than citations to legal authorities, including statutes, regulations, and judicial or NRC Issuances decisions) should be accompanied by an evidentiary exhibit that includes the relevant portions of the supporting material cited.<sup>4</sup>

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<sup>3</sup> The parties should be aware that as the result of a recent upgrade to the E-Filing system, all protective order material in this proceeding is available to those with access to protective order filings in this proceeding via the "Access Authorized Protected Documents" link on the E-Filing portal page.

<sup>4</sup> Relative to the exhibits supporting the testimony of each witness/panel that is making a presentation, when a witness/panel is first seated for a presentation, AES and staff counsel should be prepared to identify for the record (with a brief description of each document) all the  
(continued...)

6. Protocols Associated with Prefiled Presentation Exhibits

a. Duplicate Exhibits. Only one copy of each item of documentary material should be offered as evidence in this proceeding. For example, if the NRC staff offers (and has admitted) a certain portion of a staff report regarding the EREF, AES should not then offer into evidence the same portion of the report. Instead, AES would rely on the document already proffered by the staff.

To this end, the parties should consult with one another and determine whether any of the prefiled exhibits a party intends to offer into evidence in support of its presentation would otherwise be duplicated by the other party in the proceeding. In each instance this is found to be the case, the parties should determine, based on the order of party presentations, which party will first offer the exhibit into evidence. The other party intending to use that material as an exhibit should revise its evidentiary submissions to reference the initial submitting party's exhibit number.<sup>5</sup> Additionally, the parties should follow this practice relative to any exhibits utilized for evidentiary material introduced in the first instance during the evidentiary hearing itself.

b. Exhibit Numbering and Sequencing. To expedite electronic processing, for the contested proceeding each party should number their prefiled exhibits in a format that consists

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<sup>4</sup>(...continued)

exhibits counsel anticipates will be used for the first time in the mandatory proceeding during that presentation that have not previously been identified. The Board will then entertain a request to admit the proffered slide presentations regarding the presentation topic, any evidentiary material referenced in the slide presentations not previously admitted, and any resume(s)/professional qualifications statement(s) for the witness/panel not previously admitted. The Board would not, however, admit any other prefiled evidentiary material identified as potentially relevant to that presentation until it is referenced or discussed by a witness during the presentation.

<sup>5</sup> When duplicate prefiled party exhibits have been identified, the party that is recognized as the one that initially will offer the document must, if it subsequently decides not to offer the item, provide timely notice of its intent to the other party who identified the item as a duplicate document.

of a three-character party designation, followed by a six-character zero-filled number. The three-character designation to be used by each of the parties is as follows: AREVA Enrichment Services, LLC - AES, NRC staff - NRC. Consequently, a typical number sequence for the staff's exhibits would be as follows:

NRC000001

NRC000002

\* \* \* \* \*

NRC000100

To the extent possible, the parties should order and number their prefiled exhibits in the sequence the parties plan to identify, and present testimony referring to, each exhibit.

c. Exhibit Number Location. The exhibit number should be placed in the upper right hand corner of the first page of the exhibit. A separate cover sheet should be used for an exhibit only if there is no space on the first page of the exhibit into which the number can be legibly placed.

d. Revised Exhibits. In the event a party needs to provide a revised version of a previously prefiled exhibit, the exhibit should be refiled with a letter "R" in place of the first zero in the exhibit number, such that, for example, a revised version of staff exhibit NRC000001 would be designated NRCR00001. If a second or subsequent revision is necessary, the exhibit should be refiled with a sequential number in the place of the next zero in the exhibit number, e.g., NRCR20001.

e. Large File-Size Exhibits. If a party finds that it needs to break a document into several segments to ensure it does not exceed the agency's guidance on recommended file sizes for submissions, see NRC, Guidance for Electronic Submissions to the NRC 14-15 (rev. 6 May 17, 2010) available at

<http://www.nrc.gov/site-help/e-submittals/guide-electronic-sub-r6.pdf>, each of the segments should be labeled by placing an alpha designation next to the number of the exhibit in a way that will reflect the relationship of that part to the other parts of the document. For example, if a staff exhibit that would otherwise have the number NRC000001 were submitted in three parts because of file size, each portion would have a different exhibit number in the following sequence: NRC00001A, NRC00001B, and NRC00001C.

#### 7. Exhibit List

At the time they submit the exhibits associated with their presentations, each party should provide Board law clerk Jonathan Eser (e-mail address: [jonathan.eser@nrc.gov](mailto:jonathan.eser@nrc.gov)) with an electronic copy (preferably in Word format) of their prefiled exhibit list. In addition, concurrent with the filing of any revised evidentiary materials, each party should provide the Board's law clerk with an updated exhibit list.<sup>6</sup> In that regard, to the extent possible the parties should utilize the exhibit list template included as Attachment A to this issuance, which Mr. Eser can provide in Word format upon request.

In this regard, the parties should complete for each exhibit listing the party exhibit number, witness/panel, and description fields, including an ADAMS accession number to the extent it is available for the document (or portion of the document) that will be proffered. Also, for any exhibit having a confidential/sensitive status that would preclude public disclosure, the listing information should be set forth in **bold** type. Moreover, in each instance when a party submits a revised exhibit, the party also should provide Mr. Eser with a revised electronic copy of its prefiled exhibit list that reflects the change.

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<sup>6</sup> Because the parties, having previously consulted regarding exhibit duplication, see section C.6.a supra, should be aware of the exhibits each is utilizing, the Board is not requiring that these exhibit lists be provided to the other party. The parties nonetheless are free to make such an exchange if they wish.

8. Copies of Transcripts

Given the likelihood that none of the presentations will require more than a single day, the Board does not anticipate using overnight transcript service. The Board will, however, request that each hearing session be transcribed within two business days.

9. Opening Statements by Counsel

To the extent the parties wish to do so, at the outset of the mandatory hearing the Board will afford one counsel for each of the parties a total of fifteen minutes to present a summary of that party's anticipated evidentiary presentations/proof relative to the matters being considered during the January 2011 portion of the mandatory hearing, as well as the ultimate safety findings the Board must make regarding the application, see Licensing Board Initial Scheduling Order (May 19, 2010) app. A. The order of party opening statements will be specified in a subsequent issuance.

10. Audio/Visual Needs

If either of the parties making a mandatory hearing evidentiary presentation has a special audio/visual display equipment requirement, it should advise the Board in the January 7 filing discussed in section C.2 above.

11. Use of the DDMS

If the parties wish to do so, they can utilize the DDMS before, during, and after the hearing, which will provide them electronic access to all the filings in the proceeding as well as the video of the January 2011 evidentiary hearing session. Access to the DDMS requires (1) for access via the internet, an NRC digital certificate (such as the one utilized for E-Filing transactions); and (2) a username and password. (Access to the DDMS from the computers at the counsel tables in the Licensing Board Panel hearing room only requires the Panel-issued DDMS username and password.)

Username and passwords, which will be available for up to two individuals from each party, will be issued after the individuals to whom they are being assigned have had a brief training session, which includes a review of security rules, and have executed a Rules of Behavior agreement. On or before Friday, January 7, 2011, the parties should provide the Board with a submission designating the individuals who are to have DDMS access. Thereafter, to arrange a training session for these individuals in the Panel hearing room during the week of January 18, 2011, please contact DDMS Project Manager Andrew Welkie, at [andrew.welkie@nrc.gov](mailto:andrew.welkie@nrc.gov) or 301-415-6541.

12. Transcript Corrections

Because it is anticipated that the parties will have post-hearing access via the DDMS to video of the proceeding, the Board anticipates that any transcript corrections requested by the parties will be informed by what is reflected in the video. The Board currently anticipates that video of the January 2011 mandatory hearing sessions will be available in DDMS immediately after the close of each hearing session. Accordingly, proposed transcript corrections will be due within seven days of the date of the close of the hearing, and should, to the maximum extent possible, reflect agreement among the parties. The Board urges the parties to limit the corrections to matters that are material to the substance of the testimony or statements involved. Moreover, any corrections that are not reflected in the video will not be entertained by the Board.

13. Information Updates to Schedule

If any weather-related updates or revisions to the mandatory hearing schedule are necessary, the Board will provide that information to the parties via e-mail and recorded phone message. To that end, on or before Friday, January 7, 2011, each of the parties should provide Board law clerk Jonathan Eser with the e-mail address(es) of one party representative to whom

a schedule revision e-mail can be directed for distribution to any others representing or testifying for that party. Additionally, schedule change information will be available by calling (800) 368-5642, extension 5036 (available between 7:00 a.m. and 9:00 p.m. ET, Monday through Friday, except federal holidays), or by calling (301) 415-5036 (available seven days a week, twenty-four hours a day).

14. Resubmission of Party Answers to Board Questions

In its May 19, 2010 initial scheduling order, the Board indicated relative to the parties' answers to any questions the Board might pose that "[t]he answers shall, for each question, identify the responding subject matter expert(s) or individual(s), and be submitted in exhibit form, under oath, so that they are suitable for receipt into evidence without the necessity of the personal appearance of each expert or individual." Licensing Board Initial Scheduling Order (May 19, 2010) at 3-4 (unpublished). Applicant AES and the staff have filed seven sets of answers to Board questions.<sup>7</sup> Because the Board wishes to have those answers admitted into evidence at the outset of the January 2011 evidentiary hearing, to ensure they conform to the requirements established in this order, we are requesting that the answers be reformatted and refiled along with the parties' presentation materials as follows:

a. For the staff, each set of refiled answers should begin with the page in Attachment A entitled "NRC Staff Responses . . ." and each set of answers should be assigned a separate exhibit number. The "Attachment A" cover page should not be included with the revised filing. Likewise, each affidavit and the accompanying professional qualifications statement should be

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<sup>7</sup> [AES] Response to Publicly-Available Questions on the [SER] (Nov. 19, 2010); [AES] Response to Nonpublicly-Available Questions on the [SER] (Nov. 19, 2010); Staff Publicly-Available Answers; NRC Staff Response to the Licensing Board's Initial Nonpublicly-Available Questions Regarding Safety Matters (Nov. 19, 2010); AES Response to Supplemental Questions; [AES] Response to Supplemental Nonpublicly-Available Questions on the [SER] (Dec. 13, 2010); NRC Staff Response to the Licensing Board's Supplemental Publicly-Available Questions Regarding Safety Matters (Dec. 13, 2010).

filed as a separate exhibit, without the "Attachment B" cover page. To the degree the professional qualifications statements submitted in support of the staff's answers are for individuals who will be making presentations at the evidentiary hearing, it is not necessary to submit another qualifications statement for that witness to comply with section C.3 above.

b. For AES, each set of refiled answers should begin where the AES pleading has the the heading entitled "Responses to Question[s]" and each set of answers should be assigned a separate exhibit number. Likewise, each affidavit and any accompanying professional qualifications statement should be filed as a separate exhibit. To the degree the professional qualifications statements submitted in support of the AES answers are for individuals who will be making presentations at the evidentiary hearing, it is not necessary to submit another qualifications statement for that witness to comply with section C.3 above.

c. For both the AES and staff answers, to the degree the answers cite/reference documentary material, such as the AES safety analysis report (SAR) or the staff's safety evaluation report (SER), in accord with section C.5 above, those documents (or the relevant portions of those documents) likewise should be given an exhibit number and included with the other prefiled material submitted via E-Filing on or before January 14. Also, the AES and staff answers that are being refiled should be revised to include those exhibit number references as part of their citations to that documentary material.



ATTACHMENT A



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of )  
 )  
AREVA ENRICHMENT SERVICES, LLC ) DOCKET NO. 70-7015-ML  
(Eagle Rock Enrichment Facility) )  
 )

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Board **MEMORANDUM AND ORDER (Providing Presentation Topics and Administrative Directives Associated with Mandatory Hearing on Safety Matters)**, dated December 17, 2010, have been served upon the following persons by Electronic Information Exchange.

U.S. Nuclear Regulatory Commission.  
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AREVA ENRICHMENT SERVICES, LLC (Eagle Rock Enrichment Facility) – 70-7015-ML  
**MEMORANDUM AND ORDER (Providing Presentation Topics and Administrative Directives Associated with Mandatory Hearing on Safety Matters)**

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[Original signed by Linda D. Lewis] \_\_\_\_\_  
Office of the Secretary of the Commission

Dated at Rockville, Maryland  
this 17th day of December 2010