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January 24, 2012

**VIA EMAIL AND FIRST CLASS MAIL**

Michael C. Farrar, Chair  
 Lawrence G. McDade, Administrative Judge  
 Nicholas Trikouros, Administrative Judge  
 Atomic Safety and Licensing Board  
 Mail Stop: T-3 F23  
 U.S. Nuclear Regulatory Commission  
 Washington, D.C. 20555

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**DOCKETED**

January 30, 2012 (2:00 p.m.)

OFFICE OF SECRETARY  
 RULEMAKINGS AND  
 ADJUDICATIONS STAFF

Re: Docket No. 70-3098-MLA: Shaw AREVA MOX Services, LLC's Reply Statement of Position on Contentions 9, 10, and 11

Dear Administrative Judges and Counsel for Intervenors and NRC Staff:

Shaw AREVA MOX Services, LLC ("MOX Services") herein submits to the Atomic Safety and Licensing Board ("Board") and the parties copies of its Reply Statement of Position on Contentions 9, 10, and 11, along with supporting exhibits and certificate of service. MOX Services' exhibits include Prefiled Reply Testimony on Contentions 9-11, offered by Ms. Sue King, Mr. Gary Bell, Mr. Gary Clark, and Ms. Martha Williams.

January 24, 2012

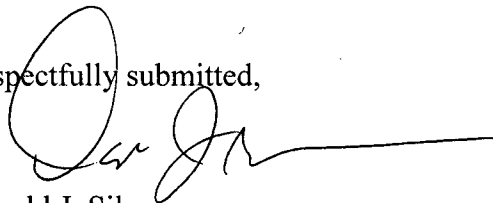
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MOX Services also provides herein an electronic copy of this submittal on CD-ROM to the Board and the Secretary of the Commission, in accordance with the Board's direction.

MOX Services has determined that, given the level of detail of these filings, the contents of this submittal do not contain security sensitive information, and need not be withheld from public disclosure or protected pursuant to the Protective Order and Non-Disclosure Declaration. This entire submittal may be recorded on the public docket.

Please contact me if you have any questions. Please contact Anna Jones, (202) 739-5881, [anna.jones@morganlewis.com](mailto:anna.jones@morganlewis.com), to resolve any discrepancies in the document submittals, should they arise.

Respectfully submitted,



Donald J. Silverman

Enclosures

c: Secretary of the Commission  
Office of Commission Appellate Adjudication  
Joshua Kirstein  
Shelbie Lewman  
Dealis W. Gwyn  
Mary Olson  
Glenn Carroll  
Louis A. Zeller

January 24, 2012

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Document Components

- 001 MOX Services' Transmittal Letter.pdf, 2670 KB
- 002 MOX Services' Reply Statement of Position on Contentions 9, 10, and 11.pdf, 341 KB
- 003 APP000031.pdf, 2886 KB
- 004 APP000032.pdf, 246 KB
- 005 APP000033.pdf, 607 KB
- 006 APP000034.pdf, 232 KB
- 007 APP000035.pdf, 484 KB
- 008 APPR00001.pdf, 23 KB

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**THE ATOMIC SAFETY AND LICENSING BOARD**

**Before Administrative Judges:  
Michael C. Farrar, Chairman  
Lawrence G. McDade  
Dr. Nicholas G. Trikouros**

In the Matter of

SHAW AREVA MOX SERVICES, LLC

(Mixed Oxide Fuel Fabrication Facility  
Possession and Use License)

January 24, 2012

Docket No. 70-3098-MLA

ALSBP No. 07-856-02-MLA-BD01

**CERTIFICATE OF SERVICE**

I hereby certify that on January 24, 2012, copies of "Shaw AREVA MOX Services, LLC's Prefiled Reply Testimony on Contentions 9-11," "Shaw AREVA MOX Services, LLC's Reply Statement of Position on Contentions 9, 10 and 11," and supporting exhibits were served upon the persons listed below by email and first class mail.

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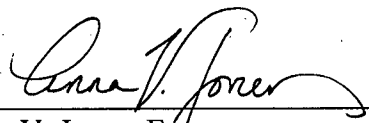
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Dated: 24 January 2012

  
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