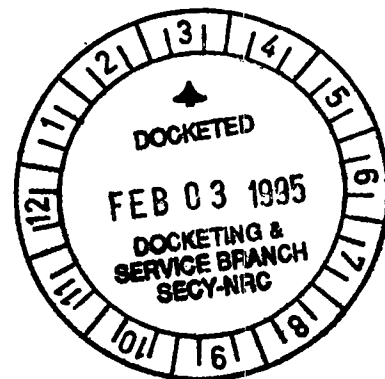


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD



In the Matter of )

SEQUOYAH FUELS CORPORATION )  
and GENERAL ATOMICS )

(Gore, Oklahoma Site )  
Decommissioning and Funding) )

Docket No. 40-8027-EA

February 3, 1995

**STIPULATED SUPPLEMENTAL MOTION FOR PROTECTIVE ORDER**

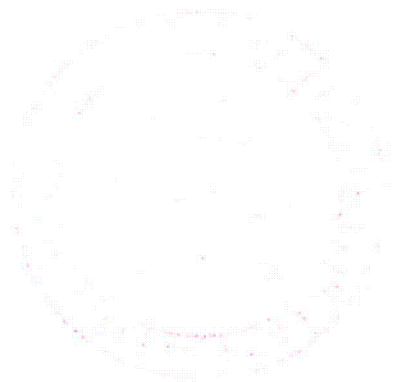
Pursuant to the direction of the Atomic Safety and Licensing Board at the January 27, 1995 hearing regarding the pending Motion for Protective Order, General Atomics respectfully submits this Stipulated Supplemental Motion for Protective Order. All parties to this proceeding except the NRC Staff have authorized the undersigned counsel to represent to the Licensing Board that they agree: (1) that the language set forth below should be included in the Proposed Protective Order, and (2) that it should be included as a numbered paragraph immediately following paragraph 5 of the Proposed Protective Order (attached as Enclosure 1 to the December 2, 1994 Motion for Protective Order of Sequoyah Fuels Corporation). Despite efforts to do so, the undersigned counsel has been unable to determine the position of the NRC Staff on this proposed language.

Proposed Language:

6. Protected Discovery Material may be disclosed to employees of the Commission's Assistant General Counsel for General Legal Services and the Office of Public Information, but solely for purposes of review

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16309



GOVERNMENT OF CANADA  
MINISTER OF INDUSTRY  
OFFICE OF THE SECRETARY  
OF THE COMMISSION

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pursuant to any requests filed under the Freedom of Information Act, 5 U.S.C. § 552(a). Such employees shall thoroughly review all Protected Discovery Material covered by requests filed under the Freedom of Information Act and determine whether the exemptions in 5 U.S.C. § 552(b) apply. Documents covered by any such exemption shall not be released. In addition, such employees shall not authorize the release of such Protected Discovery Material to any other person without first providing the party which produced the material notice in writing at least 5 working days prior to such release of the intention to release such Protected Discovery Material. In the event of such notice, the producing party shall have the right to apply to the Licensing Board for a determination that the Protected Discovery Material comes within the exceptions listed in 5 U.S.C. § 552(b) and should not be released or to take such other action as it deems appropriate. If the producing party takes the position that Protected Discovery Material or any other documents produced in discovery are not agency records subject to the Freedom of Information Act, that party may present argument to the Licensing Board in support of that position at that time.

Respectfully submitted,

By: 

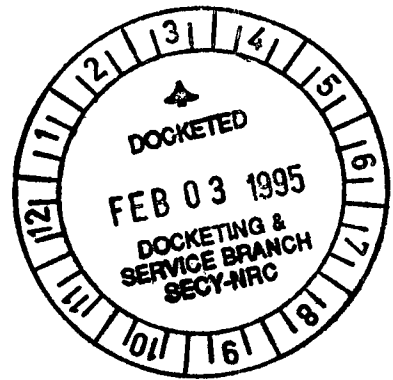
Of Counsel

Stephen M. Duncan  
Bradfute W. Davenport, Jr.  
Mays & Valentine  
110 South Union Street  
Alexandria, Virginia 22314

COUNSEL FOR GENERAL ATOMICS

January 6, 1995

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



In the Matter of	)	
	)	
SEQUOYAH FUELS CORPORATION	)	Docket No. 40-8027-EA
and GENERAL ATOMICS	)	
	)	
(Gore, Oklahoma Site	)	February 3, 1995
Decommissioning and Funding)	)	

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Stipulated Supplemental Motion for Protective Order was served on February 3, 1995, upon the following persons by deposit in the United States mail, first class postage prepaid and properly addressed, and to those persons marked with an asterisk (\*) by telecopy:

Office of the Secretary \*  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Docketing & Service Branch  
(Original and two copies)

Office of Commission Appellate Adjudication \*  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge James P. Gleason, Chairman \*  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge G. Paul Bollwerk, III \*  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge Jerry R. Kline \*  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge Thomas D. Murphy \*  
Atomic Safety and Licensing Board  
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Mr. Lance Hughes, Director  
Native Americans for a Clean Environment  
P.O. Box 1671  
Tahlequah, Oklahoma 74465

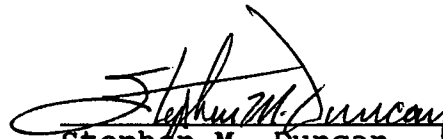
John H. Ellis, President  
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Dated this February 3, 1995.

  
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Counsel for General Atomics