

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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USNRC

ATOMIC SAFETY AND LICENSING BOARD

'95 AUG 14 P4:25

Before Administrative Judges:

James P. Gleason, Chairman
Dr. Jerry R. Kline
G. Paul Bollwerk, III
Thomas D. Murphy

OFFICE OF SECRETARY
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In the Matter of)	Docket No. 40-8027-EA
SEQUOYAH FUELS CORPORATION)	Source Material License
and GENERAL ATOMICS)	No. SUB-1010
(Gore, Oklahoma Site)	
Decontamination and)	
Decommissioning Funding))	August 11, 1995

SEQUOYAH FUELS CORPORATION'S RESPONSE TO
INTERVENORS' MOTION TO COMPEL ANSWERS TO INTERROGATORIES

Pursuant to the Atomic Safety and Licensing Board's Order dated August 8, 1995, Sequoyah Fuels Corporation ("SFC") respectfully submits this response to the Motion to Compel Answers to Interrogatories submitted by Native Americans For a Clean Environment and the Cherokee Nation (together "Intervenors") on July 28, 1995.

SFC has reviewed and agrees with the arguments presented in "General Atomics' Response to Intervenors' Motion to Compel Answers to Interrogatories" (GA's Response), which is also being filed today. Thus, SFC adopts and incorporates those arguments, as if fully set forth herein, to the extent they

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reasonably apply to the motion to compel answers to interrogatories that are directed to SFC.

In addition, SFC sets forth below its specific responses to some of the arguments presented in Intervenors' motion regarding the specific objections raised by SFC.

Interrogatory 14 to SFC. As requested by Intervenors, SFC will supplement its answer to this interrogatory if any additional interrogatory answers are furnished to the Intervenors that are prepared by individuals who have not previously been identified.

Interrogatory 18 to SFC. For the reasons set forth in Section III of GA's Response, SFC should not be compelled to answer this interrogatory. In addition, SFC notes that, without waiving its objections, SFC has stated that the only document referred to or identified in its answers to Intervenors' interrogatories has been provided to Intervenors previously. Further, SFC anticipates that it will produce any documents which it intends to introduce into evidence, in a yet to be agreed upon or ordered exchange of exhibit lists with other parties.

Interrogatory 19 to SFC. For the reasons set forth in Section I of GA's Response, SFC should not be compelled to answer this interrogatory.

Interrogatory 20 to SFC. For the reasons set forth in Section I of GA's Response, SFC should not be compelled to answer this interrogatory.

Interrogatory 25 to SFC. For the reasons set forth in Section IV of GA's Response, SFC should not be compelled to provide any further answer to this or any of the related interrogatories regarding SFC's Marketing Division. SFC has objected to these interrogatories because they call for information regarding the internal organization of SFC that is simply not relevant to this proceeding. Without waiving these objections, SFC has stated that the Marketing Division has existed within SFC since prior to November 1, 1988, for the purpose of performing the marketing functions of SFC. This organization within SFC existed long before GA became a parent company of SFC, and it has never been a separate entity from SFC.

Furthermore, SFC has identified the officers and managers of SFC employed in the Marketing Division. It has also explained that, despite the Intervenors' misplaced reliance on the American Business directory, Neal Blue has never been employed by SFC, has never been a manager or officer of SFC and has never been SFC's Chief Executive Officer. Therefore, Neal Blue has never been a manager, officer, or CEO of the Marketing Division of SFC. GA simply does not have a relationship to SFC-MD that is in any way independent from GA's status as a third-tier parent company of SFC.

Respectfully Submitted,



Maurice Axelrad
John E. Matthews

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SEQUOYAH FUELS CORPORATION

August 11, 1995

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing, "Sequoyah Fuels Corporation's Response to Motion to Compel Answers to Interrogatories," dated August 11, 1995, were served upon the following persons by deposit in the United States mail, first class postage prepaid and properly addressed, and by facsimile (except as otherwise indicated by an asterisk "*"), on the date shown below:

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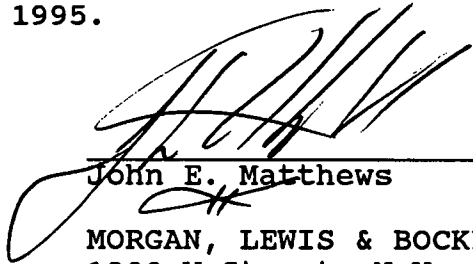
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Dated this 11th day of August, 1995.



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