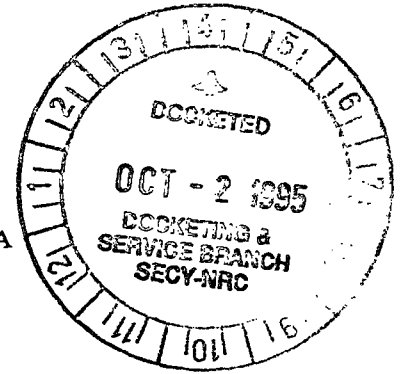




DREW EDMONDSON  
ATTORNEY GENERAL OF OKLAHOMA

September 29, 1995



Steven R. Hom  
Office of General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Re: Sequoyah Fuels Corporation General Atomics  
Docket No. 40-8027-EA

Dear Mr. Hom:

I am writing this letter on behalf of the Oklahoma Department of Wildlife Conservation (ODWC) to request that we be given additional time to consider the potential effect upon state interests of the proposed "settlement agreement" between NRC and Sequoyah Fuels. While the state is not a party to the agreement and therefore is not bound by it, any agreement limiting NRC's right to pursue decontamination and full environmental clean up at the site will affect the citizens of this state.

We feel strongly that nothing should be done to prejudice NRC's ability to seek full financial responsibility from appropriate parties. We have heard that Sequoyah Fuels may be filing bankruptcy or is otherwise having financial concerns. This should not be allowed to interfere with regulatory efforts to obtain an environmentally acceptable clean up. A preliminary review indicates that Paragraph 4 and other provisions of the agreement may allow resources to be diverted from Sequoyah Fuels in a preferential manner to creditors which are related to Sequoyah Fuels, such as General Atomic, and may impede efforts by NRC to prevent this.

We understand that litigation costs and attorney fees could deplete Sequoyah Fuels' resources if litigation is pursued unnecessarily. However, we would like the opportunity to receive and review additional information regarding Sequoyah Fuels' finances and pending litigation before finalizing our comments on the agreement.

Yours Truly,

*Jeanne Hale*  
Jeanne Hale  
Assistant Attorney General  
Environmental Protection

cc: Greg Duffy, Ok. Dept. Wildlife; Gary Sherrer, Sec. of Environment  
H.A. Caves, Dept. Environmental Quality

10/5...To OGC for Appropriate Action....Cpy to; RF, ED0...95-0863

H.A. Caves  
Ok. Dept. Environmental Quality

Maurice Axelrod  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, D.C. 20036

Lance Hughes  
NACE  
PO Box 1671  
Tahlequah, OK 74465

Diane Curran, Esq  
c/o Institute for Energy and Environmental Research  
6935 Laurel Ave, Suite 204  
Takoma Park, MD 20912

James G. Wilcoxen, Esq.  
Wilcoxen and Wilcoxen  
Cherokee Nation of Oklahoma  
P.O. Box 357  
Muskogee, OK 74402

*Jeannine Hale*

CERTIFICATE OF MAILING OR DELIVERY

I certify that I mailed a true and correct copy of the forgoing Request for Additional Time to Comment on Settlement Agreement, first class mail, postage prepaid, the 29th day of September, 1995, addressed to the following:

Steven R. Hom  
Office of General Counsel  
US Nuclear Regulatory Commission  
Washington, D C 20555

I faxed a copy of the same on the 29th day of September, 1995, to:

Maurice Axelrod  
Attorney for Sequoyah Fuels  
(202)467-7176

Steven R. Hom  
Office of General Counsel  
Nuclear Regulatory Commission  
(301)415-3725

Bob Kellogg  
Ok. Department of Environmental Quality  
(405)271-7339

Greg Duffy  
Ok. Dept. Wildlife Conservation  
(405)521-6505

Office of Secretary, NRC  
(301)415-1672

I faxed a copy of the same on 2nd of October, 1995, to:

Stephen M. Duncan  
(703)519-0140

Administrative Judges  
James Gleason  
Jerry Kline  
G. Paul Bollwerk IIII  
(301) 415-5599

I mailed a copy of the same on 2nd of October, 1995 to:

Office of the Secretary  
Nuclear Regulatory Commission  
Washington DC 20555-0001

Gary Sherrer  
Oklahoma Secretary of Environment