

JUN 03 2015

LES-15-00091-NRC

Ms. Annette L. Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Mail Stop O-16G4
Washington, D.C. 20555-0001

Louisiana Energy Services, LLC
NRC Docket No. 70-3103

Subject: Request to Participate as Panel Member for 10 CFR 61 Proposed Rule

Dear Ms. Vietti-Cook:

On March 26, 2015, the Nuclear Regulatory Commission (NRC) published a proposed rule that will significantly amend 10 CFR 61 (80 Fed. Reg 16082). Coincident with the publication, the NRC staff initiated a number of public meetings (which are still ongoing) to further inform stakeholders and interested parties about the bases for, and implementation of, the proposed rule. During one of the early meetings, responding to a stakeholder suggestion, the NRC agreed to introduce a panel discussion into one or more future public meetings to facilitate greater interaction between the NRC staff and stakeholders.

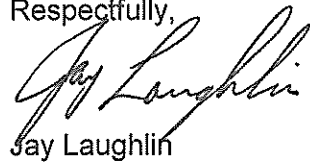
On June 25, 2015, in the Commissioners' Conference Room, there will be public meeting on 10 CFR 61 and Low-Level Radioactive Waste Disposal. Specifically, a panel of industry and NRC representatives will discuss the proposed revisions to Part 61. Louisiana Energy Services, LLC (dba URENCO USA(UUSA)) would like to be part of this panel discussion. Should this request be granted, Perry Robinson will represent UUSA. His bio is attached as Enclosure 1.

As discussed with Larry Camper, Director, Division of Decommissioning Uranium Recovery and Waste Programs, via telephone recently, UUSA believes, for a number reasons, that it is a critical stakeholder and thus, should be included as a panel member. Among the reasons is that UUSA is currently and for the reasonably foreseeable future the only operating enrichment facility in the US. Furthermore, the proposed rule arose out of a UUSA hearing and clearly any increases in regulatory burden and/or cost that are ultimately imposed on disposal site licensees will assuredly be passed onto waste generators such as UUSA. The cost of decommissioning and DUF6 disposal could significantly increase as a result of the rule change. Given the substantial probability of impact on UUSA that the Part 61 rulemaking will have, we believe it extremely important and relevant for us to be afforded an opportunity to participate in any panel discussions planned during future public meetings.

Therefore, UUSA formally requests to be a participating panel member in the Commission Briefing planned for June 25, 2015. Because of the critical nature of our interests related to the rulemaking and due to the limited opportunities to participate in an interactive manner, I request that you promptly confirm that UUSA will be among the panel members at this future public meeting.

We appreciate your attention to this matter. If you have any questions, please contact me at (575) 394-5599 or jay.laughlin@urenco.com.

Respectfully,



Jay Laughlin
Chief Nuclear Officer and Head of Operations

Enclosure: Perry Robinson Bio

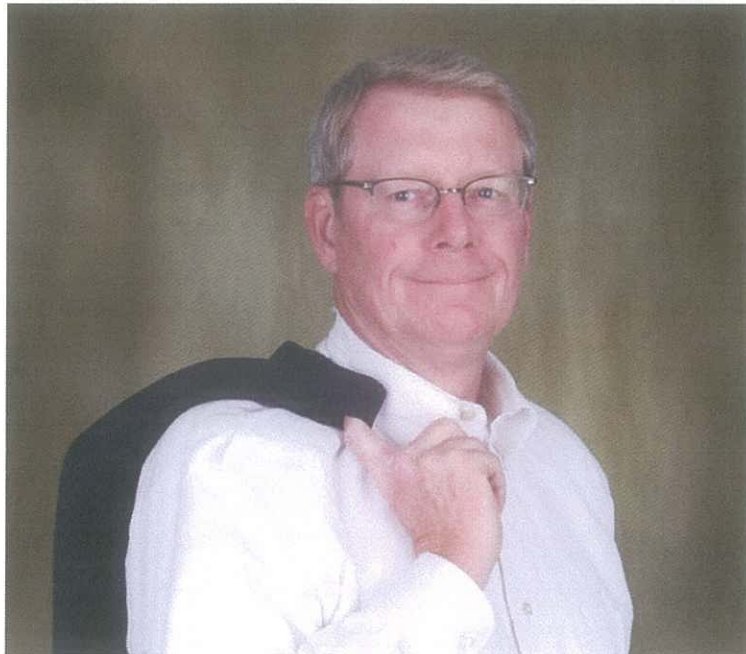
cc: Commissioners
NRC/EDO
Deputy Executive Director, Materials, Waste, Research, State, Tribal and Compliance Programs
Director, Office of NMSS
Director, Division of Fuel Cycle Safety, Safeguards & Environmental Review
Director, Division of Decommissioning, Uranium Recovery & Waste Programs
Chief, Low-Level Waste Branch
Chief, Enrichment Branch
Janelle B. Jessie, DUWP, NMSS, NRC

ENCLOSURE

Perry Robinson Bio

Mr. Robinson currently acts as General Counsel for Louisiana Energy Services, LLC (dba UUSA). Prior to retiring from UUSA at the end of 2013, Mr. Robinson was the Vice President of Regulatory Affairs and General Counsel for the company. His organizational responsibilities include Legal, Licensing, Performance Improvement (which includes the corrective action program), State Permitting and Employee Concerns. His organization supports compliance with export control issues.

Prior to joining UUSA, Mr. Robinson was a partner in the Business and Finance Department at Ballard Spahr Andrews & Ingersoll, LLP and previously a partner at Winston & Strawn in Washington, D.C. In his private law practice, Mr. Robinson routinely represented clients before the Nuclear Regulatory Commission (NRC), Federal Energy Regulatory Commission (FERC), Department of Energy (DOE), and state utility commissions. Mr. Robinson's legal practice included representing a



Regional Transmission Organization (RTO), investor-owned utilities, generation and transmission cooperatives, DOE contractors and vendors associated with the energy industry. His work with these clients covered a broad range of matters, such as utility restructuring, including sales and acquisition of nuclear generating plants before state agencies and the NRC; power purchase agreements; various NRC matters such as whistleblower issues, enforcement actions, licensing actions, and rulemaking activities; enforcement matters before other federal agencies such as the Department of Transportation, Federal Aviation Administration, Federal Highway Administration, and the DOE; and administrative litigation before NRC, FERC, public utility commissions and

state agencies. Mr. Robinson also writes and speaks extensively on regulatory matters.

Prior to practicing law, Mr. Robinson served on the enforcement and licensing staff of the NRC from 1982 - 1987; worked on the technical staff of Battelle Memorial Institute—Pacific Northwest Laboratories from 1981 – 1982; and was part of the research staff at the Radiation Research Section, Department of the Army from 1976 - 1981.

A law graduate of the University of Baltimore (J.D., 1986), Mr. Robinson received his B.S. degree from Virginia Polytechnic Institute (1975) and his M.S. degree (Health Physics) from Rutgers University (1981). He is admitted to the bar in the District of Columbia and Maryland and is admitted to practice before the U.S. Court of Appeals for the District of Columbia.

NRCExecSec Resource

From: Romero, Veronica <Veronica.Romero@urenc.com>
Sent: Wednesday, June 03, 2015 5:17 PM
To: NRCExecSec Resource; Janelle.Jesse@NRC.gov; Smith, Brian; tom.grice@nrc.gov; Suber, Gregory; Camper, Larry; Bailey, Marissa; Haney, Catherine; Weber, Michael; Satorius, Mark; CMRBARAN Resource; CMROSTENDORFF Resource; CMRSVINICKI Resource; CHAIRMAN Resource
Cc: Johnson, Amy; Cowne, Stephen; Robinson, Perry
Subject: RE: Request to Participate as Panel Member for 10 CFR 61 Proposed Rule
Attachments: LES-15-00091-NRC Request to Participate as Panel Member for 10 CFR 61 Proposed Rule.zip; ATTO0001.txt

Ms. Vietti-Cook,

Attached is URENCO USA's request to participate in the panel for the 10 CFR 61 proposed rule. Thank you for your prompt attention in processing our request.

Thanks,

Veronica Romero
Licensing & Performance Assessment
Administrative Assistant

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