

DOCKETED
USNRC

April 19, 1999

'99 APR 21 P3:42

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD PANEL

OFFICE OF SECRETARY
RULE-MAKING AND
ADJUDICATIONS STAFF

Before Administrative Judges:
Peter B. Bloch, Presiding Officer
Thomas D. Murphy, Special Agent

ORIGINAL

In the Matter of:)
)
)

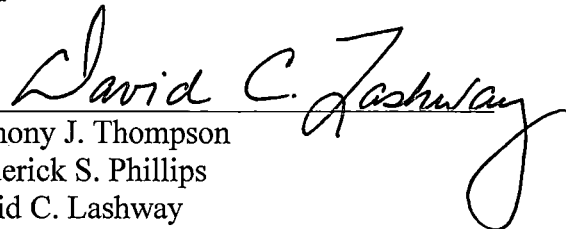
HYDRO RESOURCES, INC.)
2929 Coors Road, Suite 101)
Albuquerque, NM 87120)
_____)

Docket No. 40-8968-ML
ASLBP No. 95-706-01-ML

**HYDRO RESOURCES, INC.'S RESPONSE
TO INTERVENORS' MOTION FOR LEAVE TO SUBMIT
REPLIES TO NRC STAFF'S RESPONSE REGARDING ENVIRONMENTAL JUSTICE
ISSUES**

Hydro Resources, Inc. ("HRI") submits this response to Intervenor's April 13, 1999 motion ("Motion") seeking leave to submit a reply to the NRC Staff's presentations regarding environmental justice issues. For the reasons set forth in the NRC Staff's responses to Intervenor's request, and those discussed in HRI's environmental justice presentations, Intervenor's motion should be denied.

Respectfully submitted this 19th day of April, 1999.



Anthony J. Thompson
Frederick S. Phillips
David C. Lashway
SHAW, PITTMAN, POTTS & TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037-1128

10

U.S. NUCLEAR REGULATORY COMMISSION
RULEMAKING & ADJUDICATIONS STAFF
OFFICE OF THE SECRETARY
OF THE COMMISSION

Document Statistics

Postmark Date FE
Copies Received 3
Add'l Copies Reproduced 0
Special Distribution
OGC, RIDS

Tel.: (202) 663-8000
Fax: (202) 663-8007

Jeptha P. Hill
Law Office of Jeptha P. Hill
816 Congress Avenue, Suite 1100
Austin, Texas 78701-2443

ON BEHALF OF HYDRO RESOURCES, INC.
2929 Coors Road, Suite 101
Albuquerque, New Mexico 87120

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'99 APR 21 P 3:42

ATOMIC SAFETY AND LICENSING BOARD PANEL

OFFICE OF SECRETARY
RULEMAKING AND
ADJUDICATION'S STAFF

Before Administrative Judges:
Peter B. Bloch, Presiding Officer
Thomas D. Murphy, Special Agent

In the Matter of:)
)
)

HYDRO RESOURCES, INC.)
2929 Coors Road, Suite 101)
Albuquerque, NM 87120)
_____)

Docket No. 40-8968-ML
ASLBP No. 95-706-01-ML

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing documents, HYDRO RESOURCES, INC.'S RESPONSE TO INTERVENORS' MOTION FOR LEAVE TO SUBMIT REPLIES TO NRC STAFF'S RESPONSE REGARDING ENVIRONMENTAL JUSTICE ISSUES, in the above-captioned proceeding were sent to the following by overnight mail on this 19th day of April, 1999.

Administrative Judge
Peter B. Bloch, Presiding Officer
Atomic Safety and Licensing Board
Two White Flint North
11545 Rockville Pike
U.S. Nuclear Regulatory Commission
Rockville, Maryland 20852

Adjudicatory File
Atomic Safety and Licensing Board
One White Flint North
11555 Rockville Pike
U.S. Nuclear Regulatory Commission
Rockville, Maryland 20852

Office of the Secretary
Attn: Rulemakings and Adjudications Staff
One White Flint North
11555 Rockville Pike
U.S. Nuclear Regulatory Commission
Rockville, Maryland 20852

Office of Commission Appellate
Adjudication
One White Flint North
11555 Rockville Pike
U.S. Nuclear Regulatory Commission
Rockville, Maryland 20852

Administrative Judge
Thomas D. Murphy
Special Assistant
Atomic Safety and Licensing Board
Two White Flint North
11545 Rockville Pike
U.S. Nuclear Regulatory Commission

Atomic Safety and Licensing Board Panel
One White Flint North
11555 Rockville Pike
U.S. Nuclear Regulatory Commission
Rockville, Maryland 20852

Rockville, Maryland 20852

Jep Hill, Esq.
Jep Hill and Associates
816 Congress Avenue, Suite 1100
Austin, Texas 78701

Mitzi Young
John Hull
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Mr. Mark Pelizza
Vice President
URI, Inc.
Lockbox 12 - 12750 Merit Drive, Suite 1020
Dallas, TX 75251

Mitchell W. Capitan, President
Eastern Navajo-Diné Against
Uranium Mining
P.O. Box 471
Crownpoint, New Mexico 87313

Marilyn Morris
c/o Roderick Ventura
and Samuel D. Gollis
DNA - People's Legal Services, Inc.
P.O. Box 306
Window Rock, AZ 86515

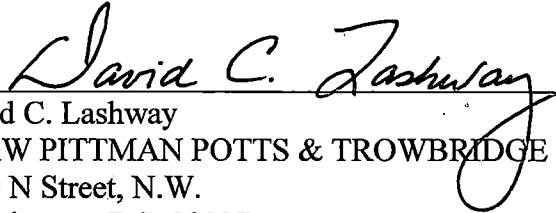
Richard F. Clement, Jr., President
Hydro Resources, Inc.
2929 Coors Road, Suite 101
Albuquerque, New Mexico 87120

Douglas Meikeljohn
Johanna Matanich
New Mexico Environmental Law Center
1405 Luisa Street Suite 5
Santa Fe, NM 87505

Diane Curran, Esq.
Harmon, Curran, Spielberg & Eisenberg
2001 S Street, N.W., Suite 430
Washington, D.C. 20009

W. Paul Robinson
Chris Shuey
Southwest Research and Information Center
P.O. Box 4524
Albuquerque, New Mexico 87106

Grace Sam
c/o Roderick Ventura
and Samuel D. Gollis
DNA - People's Legal Services, Inc.
P.O. Box 306
Window Rock, AZ 86515



David C. Lashway
SHAW PITTMAN POTTS & TROWBRIDGE
2300 N Street, N.W.
Washington, DC 20037

Counsel for Hydro Resources, Inc.