

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

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HOLTEC INTERNATIONAL)	
)	Docket No. 72-1051
(HI-STORE Consolidated Interim Storage)	
Facility for Interim Storage of Spent Nuclear Fuel))	
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**STATEMENT AS TO ORAL ARGUMENT FORUM
OF NAC INTERNATIONAL INC.**

On November 7, 2018, the Atomic Safety & Licensing Board (“Board”) requested interested parties to provide a brief statement as to their preferred method and location of oral argument.¹

NAC International Inc. (“NAC”) prefers that oral argument be held at the U.S. Nuclear Regulatory Commission’s Atomic Safety and Licensing Board Panel Hearing Room in Rockville, Maryland (the “ASLBP Hearing Room”), with parties participating in person or through electronic means. Nonetheless, NAC is also able to participate in New Mexico at any location mentioned by the other parties.

One option for the Board to consider is to bifurcate the oral argument, with part of it held in New Mexico, and other portions held in Rockville. NAC believes that holding a portion of the oral argument in Rockville will not be to the detriment of the other parties or the public, as they will be able to participate or view by videoconference. Indeed, given the national interest in consolidated interim storage, hosting portions of the proceeding in the ASLBP Hearing Room, with its advanced video capabilities, may preserve the ability for parts of the oral argument to be

¹ Order Regarding Location and Method of Oral Argument (Nov. 7, 2018).

recorded or disseminated broadly, if that is the Board's intent. It will also help ensure sufficient time is available for all the parties, so that many parties are not forced to address all their contentions in a single day.

The general period presented by the other petitioners, around January 22-25, 2019, is suitable for NAC.

Respectfully Submitted,

/S/ Signed (electronically) by Sachin Desai

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NAC International Inc.

November 19, 2018

November 19, 2018

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE SECRETARY**

In the Matter of)	
)	
HOLTEC INTERNATIONAL)	
)	Docket No. 72-1051
(HI-STORE Consolidated Interim Storage)	
Facility for Interim Storage of Spent Nuclear Fuel))	
)	

CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2018 copies of the above **Statement as to Oral Argument Forum of NAC International Inc.** have been served through the U.S. Nuclear Regulatory Commission E-Filing system on the participants of the above-captioned proceeding.

Respectfully Submitted,

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November 19, 2018