

14693

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'94 FEB 16 P3:50

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
LOUISIANA ENERGY SERVICES, L.P.) Docket No. 70-3070-ML
)
(Claiborne Enrichment Center))

LOUISIANA ENERGY SERVICES' MOTION
PROPOSING A SITE VISIT BY THE PARTIES

I. Introduction

Pursuant to 10 C.F.R. § 2.730, and in response to the Licensing Board's February 3, 1994, "Notice to the Parties Regarding Proposed Site Visit," Applicant Louisiana Energy Services, L.P., moves that the Licensing Board and the parties to this proceeding participate in a site visit to Urenco facilities similar to the Claiborne Enrichment Center.

II. Background

At the May 5, 1992, Prehearing Conference, Applicant offered to arrange a visit of comparable Urenco facilities in Europe by the Licensing Board and representatives of the parties. The Licensing Board suggested that a site visit would be premature at that time, but that any of the parties could raise the matter when appropriate.^{1/} Applicant raised the matter in the "Parties March 15, 1994, Joint Progress Report," requesting the Licensing

^{1/} "Memorandum and Order (Memorializing Prehearing Conference)," dated May 7, 1992, at 5.

D503

Board to consider whether such a visit would be appropriate given the current stage of the licensing proceeding, and requesting a prehearing conference by telephone to discuss necessary arrangements and positions of the NRC staff and parties.

In that Progress Report, Intervenor objected to a site visit because of financial constraints, but noted that if a site visit is planned, Intervenor's representatives should be in attendance.

The instant Motion responds to the Licensing Board's February 3, 1994, Notice requesting the parties to formally move the Licensing Board of the need for a such a site visit.

III. Discussion

Applicant proposes that the Licensing Board and the parties to this proceeding participate in an information gathering tour of Urenco's Gronau and Almelo enrichment facilities in Germany and the Netherlands, respectively. These facilities are similar to the proposed Claiborne Enrichment Center ("CEC"), which is the first-of-a-kind enrichment facility in the United States.

Such a tour will provide invaluable opportunities for first-hand observation of the equipment, processes and activities associated with operating a centrifuge uranium enrichment facility. NRC staff members, NRC consultants and members of the communities in the vicinity of the CEC have toured these facilities and have found the visits to be vital to their understanding of the centrifuge enrichment process.

The tour would include inspection of the UF₆ handling areas, including autoclaves and take-off stations, cylinder storage areas, and examination of the centrifuges to the extent permitted by security procedures. Further, the tour also would focus on the interaction of the facilities with the surrounding communities.

Although a tour of Urenco's centrifuge enrichment plant in England would be instructive, the benefit likely would not justify the additional cost. Almelo and Gronau are relatively close to each other (about 32 km.) and their facilities and equipment more closely resemble the CEC.

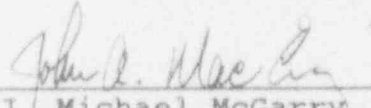
Intervenor has voiced an objection to Applicant's proposed tour on financial grounds, but has noted that its representatives should participate if the Licensing Board and other parties decide to do so.

Applicant agrees that an Intervenor representative should participate, and believes that a tour by the Licensing Board and the parties is extremely valuable to this licensing proceeding. Therefore, to avoid losing the opportunity, Applicant is willing to subsidize a portion of Intervenor's expenses for one participant. Applicant estimates the trip will cost about \$2,600 per person. If Intervenor will inform Applicant of the amount it can pay, Applicant will determine how much of the difference it is willing to subsidize.

IV. Conclusion

Applicant moves the Licensing Board to participate in the fact-finding tour, and is willing to work with Intervenor to help overcome monetary limitations to ensure that all the parties can benefit from the information to be obtained by such a tour. Applicant also is willing to work with Intervenor to overcome other objections, if any.

LOUISIANA ENERGY SERVICES, L.P.

 FOR: _____
J. Michael McGarry, III

WINSTON & STRAWN,
ATTORNEYS FOR LOUISIANA ENERGY
SERVICES, L.P.

February 15, 1994

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

FEB 16 P3 50

In the Matter of)
)
LOUISIANA ENERGY SERVICES, L.P.) Docket No. 70-3070-ML
)
(Claiborne Enrichment Center))

CERTIFICATE OF SERVICE

I hereby certify that copies of "LOUISIANA ENERGY SERVICES' MOTION PROPOSING A SITE VISIT BY THE PARTIES" have been served on the following by deposit in the United States Mail, first class, this 15th day of February, 1994:

Administrative Judge
Morton B. Margulies, Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555
(2 copies)

Administrative Judge
Richard F. Cole
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
Frederick J. Shon
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Secretary of the Commission
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555
Attention: Chief, Docketing and
Service Section
(Original plus 2 copies)

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Eugene Holler, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Ronald Wascom, Deputy Assistant
Secretary
Office of Air Quality &
Radiation Protection
P.O. Box 82135
Baton Rouge, LA 70884-2135

Joseph DiStefano
Louisiana Energy Services, L.P.
2600 Virginia Avenue, N.W.
Suite 610
Washington, D.C. 20037

Peter G. LeRoy
Duke Engineering and Services,
Inc.
230 South Tryon Street
P.O. Box 1004
Charlotte, NC 28201-1004

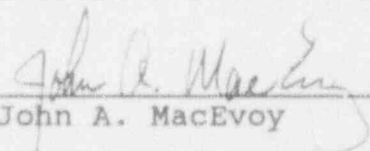
Marcus A. Rowden
Fried, Frank, Harris, Shriver &
Jacobsen
1101 Pennsylvania Avenue, N.W.
Suite 900 South
Washington, D.C. 20004

Diane Curran
Harmon, Curran, Gallagher &
Spielberg
6935 Laurel Avenue, Suite 204
Takoma Park, MD 20912

Nathalie Walker
Sierra Club Legal Defense Fund
400 Magazine St.
Suite 401
New Orleans, LA 70130

Adjudicatory File
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

LOUISIANA ENERGY SERVICES, L.P.



John A. MacEvoy

WINSTON & STRAWN,
ATTORNEYS FOR LOUISIANA ENERGY
SERVICES, L.P.