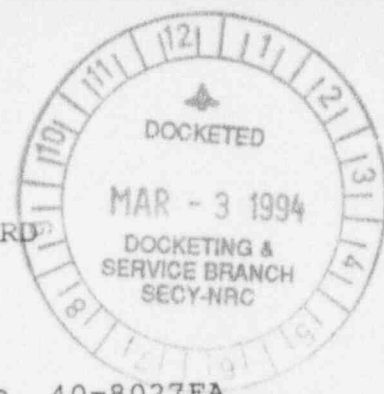


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter Of)

Sequoyah Fuels Corporation)
and General Atomics)

(Gore, Oklahoma Site Decontamination)
and Decommissioning Funding))

Docket No. 40-8027EA
Source Materials
License No. SUB-1010

**NATIVE AMERICANS FOR A CLEAN ENVIRONMENT'S
MOTION FOR LEAVE TO REPLY TO SEQUOYAH FUELS
CORPORATION'S, GENERAL ATOMICS',
AND NRC STAFF'S RESPONSES TO
NACE'S SUPPLEMENTAL PETITION TO INTERVENE**

Native Americans for a Clean Environment ("NACE") hereby requests leave to reply to Sequoyah Fuels Corporation's ("SFC's"), General Atomics' ("GA's") and the Nuclear Regulatory Commission ("NRC" or "Commission") Staff's responses to NACE's Supplemental Petition to Intervene. The opportunity is necessary in order to respond to erroneous arguments which challenge the legal basis for Contention 2, in which NACE asserts that guaranteed decommissioning funding by GA is required by NRC regulations, and is necessary for protection of public health and safety. Given that Contention 2 is one of only two contentions submitted by NACE in this proceeding, and that it raises significant issues which have not previously been addressed by the NRC, NACE respectfully submits that the opportunity for a response is necessary to make a complete and meaningful record.

NACE notes that 10 C.F.R. § 2.714 does not discuss whether a reply is permitted, and thus does not establish a time frame for

filing. However, NACE submits that this motion is timely because it is being filed within four days of February 28, 1994, when NACE received the NRC Staff's Response to Native Americans for a Clean Environment's Supplemental Petition to Intervene (February 23, 1994). NACE received GA's and SFC's responses to its Supplemental Petition to Intervene on February 18, 1994, but for efficiency's sake waited until it received the NRC Staff's response before making this brief reply.

Respectfully submitted,



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March 2, 1994