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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD P 3:56

|                                 |   |                        |
|---------------------------------|---|------------------------|
| In the Matter of                | ) | Docket No. 91-3070-ML  |
|                                 | ) | ASLBP No. 91-641-02-ML |
| LOUISIANA ENERGY SERVICES, L.P. | ) |                        |
|                                 | ) | (Special Nuclear       |
| (Claiborne Enrichment Center    | ) | Materials License)     |

3/11/94 REQUEST FOR PRODUCTION  
OF DOCUMENTS FILED BY CITIZENS AGAINST NUCLEAR TRASH  
AND DIRECTED TO LOUISIANA ENERGY SERVICES, L.P.  
PERTAINING TO CONTENTION Q

Intervenor, Citizen's Against Nuclear Trash ("CANT"), hereby requests that Louisiana Energy Services, L.P. ("LES") submit a written response to this request for production of documents and provide access for inspection and photocopying by undersigned counsel of the following described documents, within thirty (30) days after service of this request.

I.

INSTRUCTIONS

The following request is a continuing one pursuant to 10 C.F.R. § 2.740(e) and CANT hereby demands that, in the event that the requested documents have been revised or altered in any way since the date originally indicated on these documents, such altered documents as well as the original documents be provided, and if at any later date LES obtains or discovers any additional information which is responsive to this request for production of documents, LES shall supplement its responses to this request promptly and sufficiently in advance of trial.

DS03

If you withhold any document covered by this request under a claim of privilege, immunity, or for any other reason, please furnish a list identifying each document for which the privilege, immunity, or other reason is asserted, together with the following information: date, author, recipient, persons to whom copies were furnished and the job title of any such persons, the subject matter of the documents, the name of the person on whose behalf the privilege, immunity, or other reason is asserted, and the basis for asserting the privilege, immunity, or other reason in sufficient detail so as to enable the administrative law judges in this matter to determine the sufficiency of your claim.

With respect to any document you withhold under a claim of privilege, immunity, or for any other reason, please provide each portion (e.g., sentences, portions of sentences, and figures) of such documents which are not, in and of themselves, subject to a claim of privilege, immunity, or any other basis for withholding the document; that is, provide the documents with only the portions you claim are privileged blacked out.

## II.

### REQUEST FOR PRODUCTION OF DOCUMENTS

#### REQUEST FOR PRODUCTION NO. Q-1:

Please produce attachments C, E, F and H to the May 1, 1992, LES letter to the NRC Staff regarding financial qualifications.

REQUEST FOR PRODUCTION NO. Q-2:

Please produce Sections 9.1, 9.2, 11.1(f), 13.1, 13.4, 15.2, and Exhibits C and D to the First Amendment to the Partnership Agreement for Louisiana Energy Services, L.P.

Respectfully submitted,

SIERRA CLUB LEGAL DEFENSE FUND, INC.  
400 Magazine Street, Suite 401  
New Orleans, Louisiana 70130  
Telephone: (504) 522-1394

By: Nathalie M. Walker  
Nathalie M. Walker

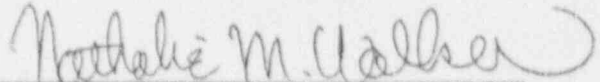
March 11, 1994.



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|--|-------------------------------|
| Office of Commission Appellate<br>Adjudication<br>U.S. Nuclear Regulatory<br>Commission<br>Washington, D.C. 20555  | By first class mail<br>1 copy |
| Eugene Holler, Esq.<br>Office of the General Counsel<br>U.S. Nuclear Regulatory Commission<br>Washington, D.C. 20555   | By first class mail<br>1 copy |
| Joseph DiStefano<br>Louisiana Energy Services, L.P.<br>600 New Hampshire Avenue, N.W.<br>Suite 404<br>Washington, D.C. 20037   | By first class mail<br>1 copy |
| Peter G. LeRoy<br>Duke Engineering and Services, Inc.<br>230 South Tryon Street<br>Post Office Box 1004<br>Charlotte, NC 28201-1004  | By first class mail<br>1 copy |
| Marcus A. Rowden<br>Fried, Frank, Harris, Shriver<br>& Jacobsen<br>1101 Pennsylvania Avenue, N.W.<br>Suite 900 South<br>Washington, D.C. 20004                                       | By first class mail<br>1 copy |
| Diane Curran<br>Institute for Energy &<br>Environmental Research<br>6935 Laurel Avenue Suite 204<br>Takoma Park MD 20912   | By first class mail<br>1 copy |
| Ronald Wascom, Deputy Asst. Secretary<br>Louisiana Dept. of Envir. Quality<br>Office of Air Quality & Radiation<br>Protection<br>Post Office Box 82135<br>Baton Rouge, LA 70884-2135 | By first class mail<br>1 copy |
| J. Michael McGarry, III<br>Winston & Strawn<br>1400 L Street N W<br>Washington, D C 20005  | By first class mail<br>1 copy |
| Adjudicatory File<br>Atomic Safety and Licensing Board Panel<br>U.S. Nuclear Regulatory Commission<br>Washington, D.C. 20555   | By first class mail<br>1 copy |

Respectfully submitted,

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By:   
Nathalie M. Walker

Attorneys for intervenor,  
Citizens Against Nuclear Trash

March 11, 1994.