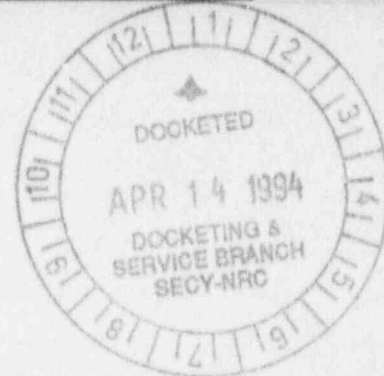


14893

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION



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  
  
April 13, 1994

NATIVE AMERICANS FOR A CLEAN ENVIRONMENT'S  
MOTION FOR CONSOLIDATION AND/OR EXTENSION  
OF BRIEFING SCHEDULE

On April 7, 1994, Sequoyah Fuels Corporation ("SFC") filed a Notice of Appeal and Brief challenging LBP-94-5, the Licensing Board's March 3, 1994, order which admits Native Americans for a Clean Environment ("NACE") as an intervenor in this proceeding. In addition, the Commission is now considering whether to accept the Licensing Board's referral of certain of the issues decided in LBP-94-5.

NACE wishes to conserve its resources and avoid the wasted time and expense involved in briefing the same issues twice. NACE also believes that the ten-day response period provided by 10 C.F.R. 2.714a is inadequate to allow a meaningful opportunity to respond to SFC's brief, which is almost 30 pages long. Moreover, pursuant to CLI-94-04 (April 1, 1994), NACE must also prepare an appellate brief in the license renewal case for the SFC facility during the same time period (i.e., by May 1, 1994).

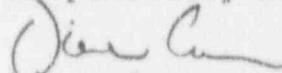
Accordingly, NACE requests that if the Commission decides to take review of LBP-94-5, it consolidate that proceeding with

DSO3

SFC's appeal of LBP-94-5, and require a single brief from NACE on the issues raised by the referral and SFC's appellate brief. NACE asks that any briefing schedule established by the Commission provide it with a reasonable opportunity to prepare a response to the issues raised in SFC's appellate brief, or at least 30 days from NACE's receipt of SFC's brief.

In the alternative, if the Commission decides not to accept the Licensing Board's referral, NACE requests an extension to provide it with a 30-day period in which to file a reply to SFC's brief, or until May 11, 1994.

Respectfully submitted,



Diane Curran  
Harmon, Curran, Gallagher  
& Spielberg  
6935 Laurel Avenue, Suite 204  
Takoma Park, MD 20912  
(301) 270-5518

April 13, 1994

CERTIFICATE OF SERVICE

I certify that on April 13, 1994, copies of the foregoing NATIVE AMERICANS FOR A CLEAN ENVIRONMENT'S MOTION FOR CONSOLIDATION AND/OR EXTENSION OF BRIEFING SCHEDULE were served by first-class mail on the following:

Ivan Selin, Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Forrest J. Remick, Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

E. Gail de Planque, Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Kenneth C. Rogers, Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

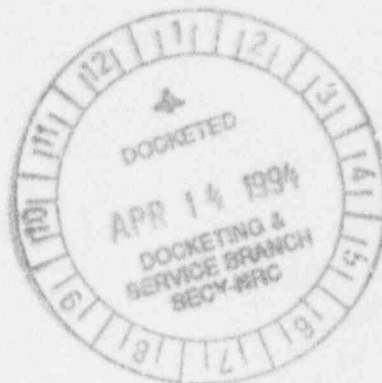
Administrative Judge James P. Gleason  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge G. Paul Bollwerk  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge Jerry R. Kline  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Administrative Judge Thomas D. Murphy  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Steven R. Hom, Esq.  
Richard G. Bachmann, Esq.  
Susan G. Uttal, Esq.  
Office of General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



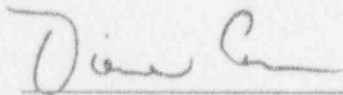
Maurice Axelrad, Esq.  
Newman, Bouknight & Edgar, P.C.  
1615 L Street N.W. Suite 1000  
Washington, D.C. 20036

Stephen M. Duncan, Esq.  
Bradfute W. Davenport, Jr., Esq.  
Mays & Valentine  
110 South Union Street  
Alexandria, VA 23314

Office of the Secretary  
Docketing and Service  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

John R. Driscoll  
General Atomics  
3550 General Atomics Court  
San Diego, CA 92121

John H. Ellis, President  
Sequoyah Fuels Corp.  
P.O. Box 610  
Gore, OK 74435



---

Diane Curran