

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

_____)
In the Matter of)

Sequoyah Fuels Corporation)

) Docket No. 40-0827-MLA

(Source Material License No. SUB-1010)
_____)

AFFIDAVIT OF PATRICIA W. BALLARD

I, Patricia W. Ballard, depose and say:

1) I am a member of Native Americans for a Clean Environment ("NACE"), and I authorize NACE to represent my interests in the license renewal proceeding for Sequoyah Fuels Corporation's uranium processing plant in Gore, Oklahoma.

2) My address is P.O. Box 861, Gore, Oklahoma, 74435. I own and live on five acres of land which lies about a mile and a half north of the SFC plant.

3) I own a cow, which I pasture on my own land and on adjacent property owned by my brother and mother, who also raise cattle. On my brother's land, which also lies about a mile and a half from the SFC plant, there is a stockpond where the cattle drink.

4) There is a well on my property whose water I would like to use to water my garden. However, I do not use the well because I am concerned that the water may be or may become contaminated from the SFC plant.

5) In years past, I often fished in Salt Branch, a creek that runs close behind the SFC plant. However, I have not fished there in about five years, since I became aware of a radioactive spill into the creek.

6) I am a member of the Cherokee Indian Nation, which owns the bed of the Arkansas River. The SFC plant discharges effluent into tributaries of the Illinois River, which flows into the Arkansas River within one-half mile of the plant. As a Cherokee, I have an interest in the quality of the sediments of the Arkansas River, their effect on the quality of the water in the Arkansas River, and their ability to support aquatic life.

7) I am very concerned about the numerous accidents, spills, explosions of hazardous materials, and incidents of soil

and groundwater contamination that have occurred at the SFC plant over the years that it has operated. I believe the SFC plant poses a risk to the health and well being of myself and my family, and threatens our interest in a clean and healthy environment.

Patricia W. Ballard
Patricia W. Ballard

Signed and sworn to before me this 7th day of December, 1990.

Thomas Caples
Notary Public
5-7-91