UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION BEFORE THE ATOMIC SAFETY AND LICENSING BOARD In the Matter of Docket No. 40-0827-MLA Sequoyah Fuels Corporation (Source Material License No. SUB-1010 AFFIDAVIT OF JESSIE DEERINWATER I, Jessie Deerinwater, 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. My address is Route 2, Box 51B, Vian, Oklahoma, 74962. My home is approximately ten miles northeast of the SFC plant. My family's only source of drinking water is a well on our property. To travel to Muskogee, or other places west of my residence, I generally have to drive on Interstate 40, which passes within two miles of the SFC plant; or on State Highway 64, which passes within one mile of the plant. I travel on these roads past the SFC plant about one to three times each week. 5) I and my family eat deer and squirrel meat from animals that we hunt on our property. To my knowledge, these animals range freely over a large area that includes the SFC plant's grounds and surrounding environment. 6) I enjoy hiking in the outdoors, and in years past my family and I regularly visited the Sequoyah Wildlife Refuge, which lies about three miles southeast of the SFC plant. However, three or four years ago we stopped visiting the refuge when the federal government declared that it was contaminated with selenium, one of the heavy metals produced by the SFC plant. 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 it has operated. I believe the SFC plant poses a 9101020199 901220 PDR ADDCK 04008027

risk to the health and well being of myself and my family, and threatens our interest in a clean and healthy environment.

Jessie Deerinwater

signed and sworn to before me this 19 day of December, 1990.

Notary Public Can

my commission expires.

CERTIFICATE OF SERVICE

I certify that on December 20, 1990, copies of NATIVE AMERICANS FOR A CLEAN ENVIRONMENT'S MOTION FOR LEAVE TO RESPOND TO NRC STAFF'S RESPONSE TO REQUEST FOR HEARING AND MOTION FOR LEAVE TO SUPPLEMENT INFORMATION SUBMITTED IN SUPPORT OF PETITION TO INTERVENE and NOTICE OF APPEARANCE for Diane Curran were served on the following by first class mail, or by overnight mail if indicated by an asterisk:

*Administrative Judge James P. Gleason Presiding Officer 513 Gilmoure Drive Silver Spring, MD 20901

*Administrative Judge Glenn O. Bright 6009 McKinley Street Bethesda, MD 20817

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

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

*Susan L. Uttal, Esq.
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Edward O. Lammers, Chairman Carlile Area Residents Association Route 1 Box 84-A Vian, OK 74962

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Sequoyah Fuels Corp.
Attn: Mr. Reau Graves, Jr., President
P.O. Box 610
Gore, OK 74435

Diane Curran

Counsel for NACE