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# UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY DOCKETING & SERVICE BRANCH

Docket No. 50-603-CP/OL

ASLBP No. 88-570-01-CP/OL

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of: All Chemical Isotope Enrichment, Inc. (AlChemIE)

RE: Facility -1, known as "Centrifuge Plant Demonstration Facility" (CPDF) located at Oak Ridge, Tennessee

### ANSWER

Comes now All Chemical Isotope Enrichment, Inc., (AlChemIE), by and through its counsel, Stephen A. Irving, and for Answer to Notice filed by United States Nuclear Regulatory Commission in the Federal Register on April 28, 1988 would say:

- Your applicant, AlChemIE, by and through its attorney, Stephen A. Irving, will appear and make necessary presentations at the Pre-Conference Hearing conducted pursuant to the referenced notice.
- Your applicant urges favorable findings to its request for a construction permit and operating license at Facility - 1, (CPDF)
- 3. In support thereof, your applicant would show that the listed issues pursuant to the Atomic Energy Act of 1954, as amended, should be resolved as follows:

Issue Pursuant to the Atomic Energy Act of 1954, as Amended

 Whether in accordance with the provisions of 10 CFR 50.34, the applicant has described the proposed design of the facility including, but not limited to, the principal architectural and engineering criteria for the design, and has identified the major features or components incorporated therein to assure adequate protection of the common defense and security.

AlChemIE Response: Yes

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88 PD 2. Whether the applicant is technically and financially qualified to construct the proposed facility in such a way as to assure adequate protection of the common defense and security.

AlChemIE Response: Yes

 Whether the issuance of a permit authorizing construction of the facility will be inimical to the common defense and security.

A1ChemIE Response: No

Issue Pursuant to National Environmental Policy Act (NEPA)

 Whether, in accordance with the requirements of 10 CFR Part 51, the construction permit should be issued as proposed.

Al ChemIE Response: Yes

- 4. Additionally, your applicant would aver that its proposed operation involve no radiological hazard to the environment, and the environmental report filed pursuant to National Environmental Policy Act of 1969 (NEPA) is sufficient to address and satisfactorly cover concerns raised thereunder.
- That your applicant will be prepared to present relevant information addressing matters raised in the <u>Federal</u> Register notice, as appropriate.

Respectfully submitted,

Stephen/A. Irving, Counsel for AlChemIE, Inc.

Stephen/A. Irving, Counsel for Alchemic, in 702 S. Illinois Avenue, Suite 202-B Oak Ridge, Tennessee 37830

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## UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY DOCKETING & SERVICE BRANCH

Docket No. 50-604-CP

ASLBP No. 88-571-01-CP

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of: All Chemical Isotope Enrichment, Inc. (AlChemIE)

RE: Facility - 2, known as Oliver Springs, located at Oliver Springs, Tennessee

### CERTIFICATE OF SERVICE

I hereby certify that true and exact copies of <u>Notice of</u> <u>Appearance</u> and <u>Answer</u> in the above-captioned proceeding have been served on the following by deposit in the United States Mail, first class, on this the 26th day of May, 1988:

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

Atomic Safety and Licensing Appeal Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555

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

Bernard M. Bordenick, Esq. Counsel for NRC Staff U.S. Nuclear Regulatory Commission Washington, DC 20555

Morton B. Margulies, Chairman Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555 Dr. Emmeth A. Luebke 5500 Friendship Boulevard, Apt 1923N Chevy Chase, Maryland 20815

Dr. Oscar H. Paris Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, DC 20555

Michael H. Mobley, Director Division of Radiological Health Tennessee Department of Health and Environment T.E.R.R.A. Building 150 9th Avenue North Nashville, Tennessee 37203

Tennessee Department of Public Health ATTN: Director, Bureau of Environmental Health Services Cordell Hull Building Nashville, Tennessee 37219

Mr. Wayne K. Scharber Director of Environment Tennessee Department of Health and Environment 1st Floor Terra Building 150 9th Avenue North Nashville, Tennessee 37203

Mr. Frank Scanlon Deputy Attorney General Tennessee Attorney General's Office 450 James Robertson Parkway Nashville, TN 37219-5025

Ms. Carol White Federal Affairs Coordinator State of Tennessee 309 John Severe Office Building 500 Charlotte Avenue Nashville, TN 37219

The Honorable Roy F. Pruett Mayor Post Office Box 1 Oak Ridge, Tennessee 37831

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Mr. Jeffrey Broughton City Manager Post Office Box 1 Oak Ridge, Tennessee 37831

Mr. William D. Harris Fire Chief Post Office Box 1 Oak Ridge, Tennessee 37830

Ms. Virginia Dale Chair Environmental Quality Advisory Board Post Office Box 1 Oak Ridge, Tennessee 37831

The Honorable Kenneth E. Yager Roane County Executive Roane County Courthouse P.O. Box 643 Kingston, Tennessee 37763

The Honorable David O. Bolling County Executive, Anderson County Courthouse Main Street Clinton, Tennessee 37716

The Honorable Stanley Justice Mayor Post Office Box 303 Oliver Springs, Tennessee 37840

Mr. Howard Elliott City Administrator Post Office Box 303 Oliver Springs, Tennessee 37840

Mr. Ronald Herbert U.S. Department of Housing and Urban Development Office of Urban Development Action Crants 451 7th Street, S.W., Room 7274 Washington, DC 20410

Mr. Richard Duncan U.S. Department of Energy MS NE-34 Germantown Washington, DC 20545 Mr. Joseph Parks U.S. Department of Lnergy Post Office Box E Oak Ridge, Tennessee 37831

Ms. Jennifer Fowler U.S. Department of Energy Post Office Box E Oak Ridge, Tennessee 37831

Commission's Public Document Room 1717 H Street NW Washington, DC 20555

Division of Industrial and Medical Nuclear Safety Director U.S. Nuclear Regulatory Commission Washington, DC 20555

Respectfully submitted,

Stephen A. Irving, Counsel for AlChemIE, Inc. 702 S. Illinois Avenue, Suite 202-B Oak Ridge, Tennessee 37830