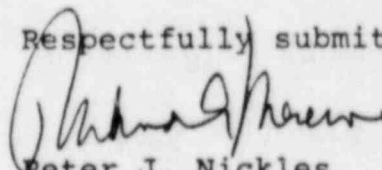


DS03

After reviewing the documents, Kerr-McGee must again express its grave concern with any transfer of responsibility to the State that would serve to usurp the authority of this Board. As the documents make clear, the purpose of a transfer of authority over mill tailings to the State would be solely to give the State adjudicatory responsibility for the stabilization of the West Chicago Facility. In light of the State's role as an advocate, it no longer has the capacity to reach an impartial decision on the matters at issue in these proceedings. A transfer thus would violate due process and would raise profound questions of fundamental fairness.

Respectfully submitted,



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April 4, 1986

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Docket No. 40-2061-ML
ASLBP No. 83-405-01-ML

Docket No. 40-2061-SC
ASLBP No. 84-502-01-SC

I hereby certify that copies of the foregoing
Kerr-McGee Reply to the NRC Staff to Response to the Kerr-McGee
Motion to Compel Production of Documents was served by
first-class mail, postage prepaid, on this 4th day of April,
1986, as follows:

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U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Dr. Peter A. Morris
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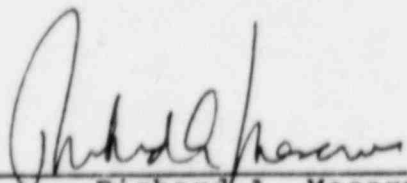
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April 4, 1986