

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of

INTERNATIONAL ENERGY ASSOCIATES LTD.

(Import License for Enriched Uranium  
Hexafluoride from South Africa)

Docket No. 11003688  
License No. ISNM-84012

In the Matter of

PHIBRO-SALOMON, INC.

(Import License for Natural and  
Enriched Uranium from South Africa)

Docket No. 11002933  
License No. ISNM-82015

In the Matter of

EXXON NUCLEAR COMPANY, INC.

(Import License for Natural and  
Enriched Uranium from A Country  
Not Specified)

Docket No. 11003365  
License No. ISNM-83025

In the Matter of

BRAUNKOHLER TRANSPORT, USA

(Import License for Natural and  
Enriched Uranium from A Country  
Not Specified)

Docket No. 11003204  
License No. ISNM-83011

In the Matter of

TRANSNUCLEAR, INC.

(Import License for Enriched Uranium  
from A Country Not Specified)

Docket No. 11003111  
License No. ISNM-83005

In the Matter of

TRANSNUCLEAR, INC.

(Import License for Special Nuclear  
Material from A Country Not  
Specified)

Docket No. 11002593  
License No. ISNM-81017

In the Matter of

NEW YORK NUCLEAR CORPORATION

(Import License for Enriched Uranium  
from A Country Not Specified)

Docket No. 11003097  
License No. ISNM-83003

In the Matter of

EDLOW INTERNATIONAL COMPANY

(Import License for Enriched Uranium  
from A Country Not Specified)

Docket No. 11002967  
License No. ISNM-82020

In the Matter of

EDLOW INTERNATIONAL COMPANY

(Import License for Nuclear Source  
Material from A Country Not  
Specified)

Docket No. 11000168  
License No. IU-78019

In the Matter of

WESTINGHOUSE ELECTRIC CORPORATION

(Import License for Enriched Uranium  
from A Country Not Specified)

Docket No. 11002348  
License No. ISNM-81001

In the Matter of

SEPARATIVE WORK UNIT CORPORATION

(Import License for Enriched and  
Natural Uranium from A Country  
Not Specified)

Docket No. 11002597  
License No. ISNM-82016

AFFIRMATION AND NOTICE OF APPEARANCE  
OF COUNSEL IN CONNECTION WITH THE  
PETITION FILED ON BEHALF OF CONGRESSMAN  
RONALD V. DELLUMS, ET AL., FOR COMMENCEMENT  
OF LICENSE REVOCATION PROCEEDINGS

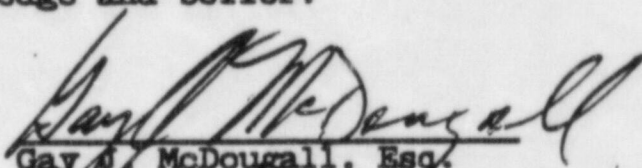
## AFFIRMATION AND NOTICE OF APPEARANCE OF GAY J. McDOUGALL

I, GAY J. McDOUGALL, state that:

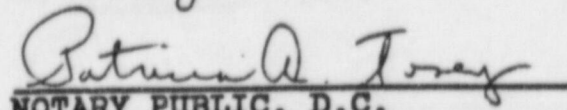
1. I am an attorney with an office in Suite 400, 1400 Eye Street, N.W., Washington, D.C. 20005. My telephone number is (202) 371-1212. I am a member in good standing of the Bar of the Court of Appeals of the State of New York.

2. I have been given written authorization by each of the Petitioners listed in Attachment A hereto to file this Petition on their behalf.

3. I or my co-counsel have consulted with Petitioners, members of Petitioners' staffs, and knowledgeable experts concerning the matters contained in the Petition, and I hereby declare that the facts contained therein are true and correct to the best of my personal knowledge and belief.

  
Gay J. McDougall, Esq.  
Director, Southern Africa Project  
LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS UNDER LAW  
1400 Eye Street, N.W.  
Suite 400  
Washington, DC 20005  
(202) 371-1212

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 16<sup>th</sup> DAY  
OF February, 1987.

  
NOTARY PUBLIC, D.C.  
My Commission Expires:

My Commission Expires September 14, 1990.



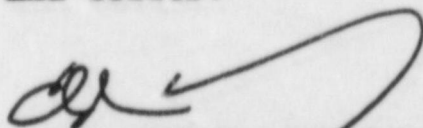
## AFFIRMATION AND NOTICE OF APPEARANCE OF ELDON GREENBERG

I, ELDON GREENBERG, state that:

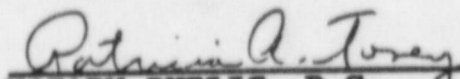
1. I am an attorney with an office in Suite 801, 1835 K Street, N.W., Washington, D.C. 20006. My telephone number is (202) 833-9084. I am a member in good standing of the Bar of the Court of Appeals of the State of New York and of the Bar of the Court of Appeals of the District of Columbia.

2. I have been given written authorization by each of the Petitioners listed in Attachment A hereto to file this Petition on their behalf.

3. I or my co-counsel have consulted with Petitioners, members of Petitioners' staffs, and knowledgeable experts concerning the matters contained in the Petition, and I hereby declare that the facts contained therein are true and correct to the best of my personal knowledge and belief.

  
 Eldon V.C. Greenberg, Esq.  
 GALLOWAY AND GREENBERG  
 1835 K Street, N.W.  
 Suite 801  
 Washington, DC 20006  
 (202) 833-9084

SWORN TO AND SUBSCRIBED  
 BEFORE ME THIS 16<sup>th</sup> DAY  
 OF February, 1987.

  
 NOTARY PUBLIC, D.C.  
 My Commission Expires:

My Commission Expires September 14, 1990

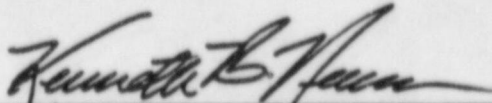
## AFFIRMATION AND NOTICE OF APPEARANCE OF KENNETH B. NUNN

I, KENNETH B. NUNN, state that:

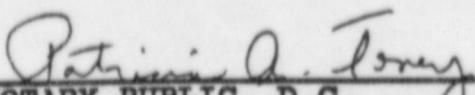
1. I am an attorney with an office in Suite 400, 1400 Eye Street, N.W., Washington, D.C. 20005. My telephone number is (202) 371-1212. I am a member in good standing of the Bar of the Supreme Court of the State of California.

2. I have been given written authorization by each of the Petitioners listed in Attachment A hereto to file this Petition on their behalf.

3. I or my co-counsel have consulted with Petitioners, members of Petitioners' staffs, and knowledgeable experts concerning the matters contained in the Petition, and I hereby declare that the facts contained therein are true and correct to the best of my personal knowledge and belief.

  
Kenneth B. Nunn, Esq.  
Staff Attorney,  
Southern Africa Project  
LAWYERS' COMMITTEE FOR CIVIL  
RIGHTS UNDER LAW  
1400 Eye Street, N.W.  
Suite 400  
Washington, DC 20005  
(202) 371-1212

SWORN TO AND SUBSCRIBED  
BEFORE ME THIS 16<sup>th</sup> DAY  
OF February, 1987.

  
NOTARY PUBLIC, D.C.

ATTACHMENT A

NAMES AND ADDRESSES OF PETITIONERS

1. Congressman Ronald V. Dellums  
2136 Rayburn House Office Building  
Washington, DC 20515  
(202) 225-2661
2. Congressman Mervyn Dymally  
1717 Longworth House Office Building  
Washington, DC 20515  
(202) 225-5425
3. Congressman William H. Gray, III  
204 Cannon House Office Building  
Washington, DC 20515  
(202) 225-4001
4. Congressman Edward J. Markey  
2133 Rayburn House Office Building  
Washington, DC 20515  
(202) 225-2836
5. Congressman Charles B. Rangel  
2330 Rayburn House Office Building  
Washington, DC 20515  
(202) 225-4365
6. Congressman Bill Richardson  
332 Cannon House Office Building  
Washington, DC 20515  
(202) 225-6190
7. Congressman Howard Wolpe  
House Subcommittee on Africa  
703 House Annex #1  
Washington, DC 20515  
(202) 226-7807
8. The Oil, Chemical and Atomic  
Workers International Union  
255 Union Boulevard  
Lakewood, CO 80228  
(303) 987-2229



9. The Nuclear Control Institute  
1000 Connecticut Avenue, N.W.  
Suite 406  
Washington, DC 20036  
(202) 822-8444
10. American Committee on Africa  
198 Broadway Avenue  
Suite 402  
New York, NY 10038  
(212) 962-1210
11. TransAfrica  
545 Eighth Street, SE  
Suite 200  
Washington, DC 20003  
(202) 547-2550
12. Washington Office on Africa  
110 Maryland Avenue, NE  
Suite 112  
Washington, DC 20002  
(202) 546-7961

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the  
foregoing Petition of Congressman Ronald V. Dellums, et al., for  
Commencement of License Revocation Proceedings and supporting  
documents were served on February 17, 1987 by hand-delivery upon  
the following:

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
1717 H Street, NW  
Washington, DC 20555  
(3 copies)

William C. Parlar  
General Counsel  
U.S. Nuclear Regulatory Commission  
1717 H Street, NW  
Room 1035  
Washington, DC 20555

Charles M. Hill  
Executive Secretary  
U.S. Department of State  
2201 C Street, NW  
Washington, DC 20520

Frederick F. McGoldrick, Director  
Office of Non-Proliferation  
and Export Policy  
Bureau of Oceans and International  
Environmental and Scientific  
Affairs  
U.S. Department of State  
2201 C Street, NW  
Washington, DC 20520

James R. Shea, Director  
Office of International Programs  
U.S. Nuclear Regulatory Commission  
East-West Towers South Building  
4340 East-West Highway  
Bethesda, MD 20855



And by mail, first-class postage paid, upon the following:

R.H. Fisk  
Manager, International Affairs  
Edlow International Company  
1815 H Street, NW  
Suite 910  
Washington, DC 20006

Phillip Brothers, Inc.  
1455 Pennsylvania Avenue, NW  
Suite 350  
Washington, DC 20004

Christie M. Clark  
Operations Manager  
Braunkohle Transport, USA  
3602-B Forest Drive  
Alexandria, VA 22302

C.W. Malody, Manager  
Corporate Licensing  
Exxon Nuclear Company, Inc.  
2101 Horn Rapids Road  
P.O. Box 130  
Richland, WA 99352

Westinghouse Electric Corporation  
Nuclear International Division  
P.O. Box 355  
Pittsburgh, PA 15230

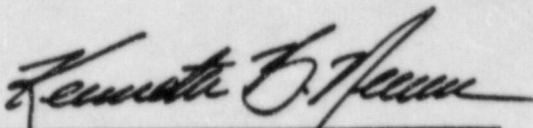
New York Nuclear Corporation  
P.O. Box D  
Merrick, NY 11566-0703

International Energy Assoc., Ltd.  
3211 Jermantown Road  
Fairfax, VA 22030

Separative Work Unit Corp. (SWUCO)  
19366 Montgomery Village Avenue  
Gaithersburg, MD 20879

Transnuclear, Inc.  
One Skyline Place  
5205 Leesburg Pike  
Falls Church, VA 22041

Signed:

  
Kenneth B. Nunn, Esq.

Dated: February 17, 1987