

From: [Margaret Cowan](#)
To: [Docket, Hearing](#); [Paul Bollwerk](#); [William Froehlich](#); [Sue Abreu](#)
Subject: [External_Sender] RE: Proposed License Amendment Request, Nuclear Fuel Services, Docket No. 70-143
Date: Friday, January 20, 2023 3:25:45 PM

Hon. Paul Bollwerk, Hon. William Froehlich, Hon. Sue Abreau, Judges
Atomic Safety and Licensing Board
Rockville, MD

Via email only to hearing.docket@nrc.gov, paul.bollwerk@nrc.gov, william.froehlich@nrc.gov,
sue.abreu@nrc.gov

RE: Proposed License Amendment Request, Nuclear Fuel Services, Docket No. 70-143

Honorable ASLB Judges:

I am writing to object to the Board's failure to provide clear instructions as to how non-parties to this license amendment proceeding are allowed to provide comments to the Board. The August 31, 2022 Federal Register notice referred non-parties to an ADAMS document which was not hyperlinked, and the notice contained zero explanation that persons would be allowed to provide public comments to the Board at the time of the December 12, 2022 hearing.

NRC regulations at 10 CFR § 2.315(a) state, "A person who is not a party . . . may, in the discretion of the presiding officer, be permitted to make a limited appearance by making an oral or written statement of his or her position on the issues at any session of the hearing or any prehearing conference within the limits and on the conditions fixed by the presiding officer." This was not done with regard to the Nuclear Fuel Services prehearing on December 12. I thus object and request that the Board place my below comments into the record of this proceeding and be deemed properly submitted pursuant to 10 CFR § 2.315(a).

As a resident of East Tennessee, I am very concerned about the dangers posed by licensing Nuclear Fuel Services to produce highly enriched uranium. Transferring the technology to produce weapons grade uranium from Y-12 in Oak Ridge to NFS in Erwin means transferring it from U.S. government control to a private for-profit corporation. Given NFS's failures to protect the local community, allowing this company to produce 96% U-235 is irresponsible at best. Already, NFS discharges nuclear waste into the Nolichucky River, the water source for Greeneville, Jonesborough, and other communities in East Tennessee, and enriched uranium from NSF has been found as far downstream as Douglas Lake. Since NFS has not protected the region while producing fuel enriched to 20% U-235, this private company cannot be trusted to produce and manage much more dangerous 96% U-235.

At a minimum, I urge you to grant Erwin Citizens Awareness Network's request for a Hearing to challenge the licensing of NFS to produce weapons grade uranium. Allowing members of the East Tennessee region to raise their objections and voice their concerns should be a key part of any process to consider a license amendment

with potentially disastrous consequences for our area.

Thank you for your consideration of this request.

Sincerely,
/s/ Margaret Cowan