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**To:** [Paul Bollwerk](mailto:Paul.Bollwerk); [William Froehlich](mailto:William.Froehlich); [Sue Abreu](mailto:Sue.Abreu); [Docket, Hearing](#)  
**Cc:** [shelley.stahlman](mailto:shelley.stahlman)  
**Subject:** [External\_Sender] Proposed License Amendment Request, Nuclear Fuel Services, Docket No. 70-143  
**Date:** Saturday, January 21, 2023 8:31:56 PM

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**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](mailto:hearing.docket@nrc.gov), [paul.bollwerk@nrc.gov](mailto:paul.bollwerk@nrc.gov), [william.froehlich@nrc.gov](mailto:william.froehlich@nrc.gov), [sue.abreu@nrc.gov](mailto: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).

I strongly object on moral and environmental grounds to your granting to Nuclear Fuel Services its above-reference license amendment request to process highly enriched uranium in its facility located very near the Nolichucky River in Erwin, TN.

First and foremost, I am against the use of extremely dangerous nuclear weapons of mass destruction the consequences of which threaten life on this planet as we know it. NFS is accustomed to producing uranium enriched to 20% U-235 for the purpose of providing nuclear power for defensive naval aircraft carriers and submarines, while under the proposed license NFS would be producing more highly enriched uranium to 96% U-235. Ultimately, this material is destined to be used in assembling new nuclear weapons in violation of U.S. and international law prohibiting the production of such weaponry. In this proposed scenario, the technology for making nuclear weapons-grade material and its transport between Y-12 facilities at Oak Ridge National Laboratories and NFS will be transferred from a government facility with high-level security to a private, for-profit corporation. There are new accident scenarios at NFS associated with this added process, such as anhydrous hydrogen fluoride release, anhydrous ammonia release, nuclear criticality, uranium hexafluoride release, and uranium solution release. Likewise, I am very troubled that NFS's current air emissions of U-234, U-235, U-238 and other toxic chemicals reportedly will be doubled and that nuclear discharge waste into the Nolichucky River will continue to adversely affect drinking water quality for all wildlife and residents for 95 miles downstream of the NFS site. In addition, the likelihood of extreme weather events exacerbated by

climate change and affecting the flow of the Nolichucky River remain to be addressed. I am very concerned that these legal, security, health and safety issues have not been taken into consideration and fully studied. I urge you to rule against the above request.

Sincerely,

/s/ Shelley Stahlman

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