

From: [eleanor goodrich](#)
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: Wednesday, January 25, 2023 11:26:55 PM

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 respectfully ask the Atomic Safety Licensing Board to grant the request for a hearing from the Erwin Citizens Awareness Network (ECAN) and to reject the application by Nuclear Fuel Services (NFS) for a license to purify uranium for nuclear weapons.

I'm concerned about the environmental and societal impacts of such a change in operations at the NFS facility. At the very least, a hearing should be allowed to weigh the evidence of the history of NFS, its ability to safely conduct the proposed changes, and the ethics of continuing chemical and radioactive degradation of our region's water and air.

ECAN simply requests a hearing to address four contentions:

- (1) A demand to rigorously investigate ongoing chemical and radioactive poisoning of underground and surface water;
- (2) an insistence on a quality assurance program;
- (3) a comprehensive assessment of the cumulative impacts on the environment of this 65-year-old plant; and
- (4) a challenge to the legality of making new weapons material at a private company when U.S. and international law prohibit the proliferation of nuclear weapons.

Such a request seems reasonable, given the long-term and regional aspects of the proposed permit on the lives and future of our citizens.

/s/ eleanor goodrich