

RAS 7881



Attorney General of New Mexico

PATRICIA A. MADRID
Attorney General

STUART M. BLUESTONE
Deputy Attorney General

May 25, 2004

DOCKETED
USNRC

June 3, 2004 (9:22AM)

Secretary of the Commission
United States Nuclear Regulatory Commission
Attn: Rulemaking and Adjudications Staff
Washington, D.C. 20555-0001
Facsimile: (301) 415-1101

OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF

Re: **In the Matter of Louisiana Energy Services, L.P. (National
Enrichment Facility)**
Docket No. 70-3103
ASLBP No. 04-826-01-ML

Dear Rulemaking and Adjudications Staff:

Enclosed are the original and three copies of the Non-Disclosure Declarations for Loretta Martinez, Kate Cotner, Joella Coca, David Thomson, Claudia Ravanelli, Judith Ann Moore, Stuart Bluestone, Mary Hughes, Frances Bassett, Stephen Farris, Chris Coppin, Glenn Smith, Diana Jackson, and David Pato for filing in the above matter. The New Mexico Attorney General would appreciate it if you would kindly file, endorse and return a copy in the enclosed self-addressed, stamped envelope provided herewith.

Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "David M. Pato".

David M. Pato
Assistant Attorney General
New Mexico Attorney General's Office

ATTACHMENT A

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
DOCKET NO. 70-3103-ML
NONDISCLOSURE DECLARATION

Under penalty of perjury, I hereby certify my understanding that (1) access to protected materials is provided to me pursuant to the terms and restrictions of the Atomic Safety and Licensing Board's May 21, 2004 protective order in this proceeding; (2) I have been given a copy of and have read the protective order; and (3) I agree to be bound by it. I understand that the contents of the protected materials, any notes or other memoranda, or any other form of information that copies or discloses protected materials shall not be disclosed to anyone other than in accordance with that protective order. I acknowledge that a violation of this declaration or the protective order, which incorporates the terms of this declaration, constitutes a violation of an order of the Nuclear Regulatory Commission and may result in the imposition of sanctions as the Licensing Board or the Commission may deem to be appropriate, including, but not limited to, referral of the violation to appropriate bar associations and other disciplinary authorities.

WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): Loretta S. Martinez

Title: Legal Assistant

Representing: N.M. Office of the Attorney General
P.O. Drawer 1508 Santa Fe, NM 87504

Signature: Loretta S. Martinez

Date: 5/24/04

ATTACHMENT A

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
DOCKET NO. 70-3103-ML
NONDISCLOSURE DECLARATION

Under penalty of perjury, I hereby certify my understanding that (1) access to protected materials is provided to me pursuant to the terms and restrictions of the Atomic Safety and Licensing Board's May 21, 2004 protective order in this proceeding; (2) I have been given a copy of and have read the protective order; and (3) I agree to be bound by it. I understand that the contents of the protected materials, any notes or other memoranda, or any other form of information that copies or discloses protected materials shall not be disclosed to anyone other than in accordance with that protective order. I acknowledge that a violation of this declaration or the protective order, which incorporates the terms of this declaration, constitutes a violation of an order of the Nuclear Regulatory Commission and may result in the imposition of sanctions as the Licensing Board or the Commission may deem to be appropriate, including, but not limited to, referral of the violation to appropriate bar associations and other disciplinary authorities.

WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *Kate Cotner*
Title: *Administrative Assistant*

Representing: *N.M. Attorney General's Office*

Signature: *Kate Cotner*

Date: *5/21/04*

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DOCKET NO. 70-3103-ML
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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *Joella Coca*

Title: *Administrative Assistant*

Representing: *New Mexico Attorney General's Office*

Signature: *Joella R Coca*

Date: *5/21/04*

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Name (Printed): DAVID THOMSON

Title: Director, Litigation

Representing: State of New Mexico, New Mexico Atty. Gen.

Signature: 

Date: 5-21-04

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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *CLAUDIA J. RAVANELLI*

Title: *PARALEGAL.*

Representing: *New Mexico Atty General's Office*

Signature: *Claudia J. Ravanelli*

Date: *5/21/04*

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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *Judith Ann Moore*

Title: *Assistant Attorney General*

Representing: *New Mexico Attorney General*

Signature: *Judith Ann Moore*

Date: *5-21-04*

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WHEREFORE, I do solemnly agree to protect such confidential information as may be disclosed to me in this NRC proceeding, in accordance with the terms of this declaration.

Name (Printed): *STUART M. BLUESTONE*

Title:

Chief Deputy Attorney General

Representing:

New Mexico Attorney General

Signature:

Stuart M. Bluestone

Date:

5/21/04

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Name (Printed):

MARY L. Hughes

Title:

Administrative Aide

Representing:

State of New Mexico
Patricia A. Madrid

Signature:

Mary J. Hughes

Date:

May 21, 2004

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Name (Printed):

Frances C. Bassett

Title:

Assistant Attorney General

Representing:

New Mexico Attorney General's
Office

Signature: *JC. Bassett*

Date: *5-21-04*

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Name (Printed): *Stephen R. Farris*

Title: *Assistant Attorney General*

Representing: *State of New Mexico*
Patricia A. Madrid, Attorney General

Signature: *Stephen R. Fair*

Date: *5-21-04*

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Name (Printed): *Chris Coppin*

Title: *Assistant Attorney General*

Representing: *State of New Mexico*

Signature:


Chris Goppin

Date:

5-21-04

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Name (Printed): *Glenn R. Smith*

Title: *Deputy Attorney General*

Representing: *State of New Mexico,
Patricia A. Madrid Attorney General*

Signature:

Glenn R. Smith

Date:

5/21/04

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Name (Printed): *DIANA JACKSON*

Title: *ADMINISTRATIVE ASSISTANT*

Representing: *ATTORNEY GENERAL PATRICIA MADRID*

Signature: *Diana Jackson*

Date: *05/24/04*

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Name (Printed): David M. Pato

Title: Assistant Attorney General

Representing: New Mexico Attorney General's Office

Signature: David M. Pato

Date: 5/21/04

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

G. Paul Bollwerk, III, Chairman
Dr. Paul B. Abramson
Dr. Charles N. Kelber

In the Matter of)

LOUISIANA ENERGY SERVICES, L.P.)

(National Enrichment Facility))

Docket No. 70-3103-ML

ASLBP No. 04-826-01-ML

CERTIFICATE OF SERVICE

I hereby certify that copies of the Non-Disclosure Declarations for Loretta Martinez, Kate Cotner, Joella Coca, David Thomson, Claudia Ravanelli, Judith Ann Moore, Stuart Bluestone, Mary Hughes, Frances Bassett, Stephen Farris, Chris Coppin, Glenn Smith, Diana Jackson, and David Pato have been served upon the following persons by electronic mail, facsimile, and/or first class U.S. mail this 25th day of May, 2004:

Office of Commission Appellate
Adjudication
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Administrative Judge
Paul B. Abramson
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: pba@nrc.gov

Dennis C. Dambly, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: dcd@nrc.gov

Administrative Judge
G. Paul Bollwerk, III, Chair
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: gpb@nrc.gov

Administrative Judge
Charles N. Kelber
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: cnk@nrc.gov

James R. Curtiss, Esq.
Winston & Strawn LLP
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Washington, DC 20005-3502
E-mail: jcurtiss@winston.com

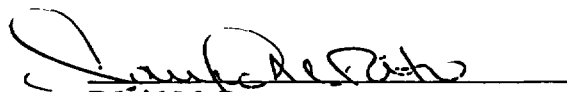
Tannis Fox, Esq.
Clay Clarke, Esq.
Assistant General Counsel
State of New Mexico Environment Dep't
1190 St. Francis Drive
Santa Fe, NM 87502-6110
E-mail: clay_clarke@nmenv.state.nm.us

Secretary of the Commission
U.S. Nuclear Regulatory Commission
Attn: Rulemaking & Adjudications
Staff
Washington, DC 20555-0001
Facsimile: (301) 415-1101
E-mail: hearingdocket@nrc.gov

Office of General Counsel
U.S. Nuclear Regulatory Commission
Attn: Assoc. Gen. Counsel for Hearings,
Enforcement & Administration
Washington, DC 20555-0001
Facsimile: (301) 415-3725

Lisa Cook, Esq.
Angela Coggins, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mails: lbc@nrc.gov
ABC1@nrc.gov

Lindsay A. Lovejoy, Jr., Esq.
618 Paseo de Peralta, Unit B
Santa Fe, NM 87501
E-mail: lindsay@lindsaylovejoy.com


David M. Pato
Assistant Attorney General