

**RELATED CORRESPONDENCE**DOCKETED  
USNRC

October 5, 2004 (4:35pM)

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION****OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF****BEFORE THE ATOMIC SAFETY AND LICENSING BOARD**

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In the Matter of

Docket No. 70-3103

Louisiana Energy Services, L.P.  
National Enrichment Facility

ASLBP No. 04-826-01-ML

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**SUPPLEMENTAL DISCLOSURE PURSUANT TO  
10 CFR 2.704(a)  
ON BEHALF OF  
PETITIONERS  
NUCLEAR INFORMATION AND RESOURCE SERVICE  
AND PUBLIC CITIZEN**

Pursuant to 10 CFR 2.704 and the Hearing Order dated January 30, 2004, and by the agreement of the parties, Petitioners Nuclear Information and Resource Service and Public Citizen ("NIRS/PC") hereby make additional disclosure pursuant to 10 CFR 2.704. This disclosure is made based upon the information now reasonably available to NIRS/PC.

1. In addition to the persons listed in the Initial Disclosure by NIRS/PC dated September 2, 2004, the persons listed below may have discoverable information relevant to disputed issues alleged in the pleadings. NIRS/PC note that the disputed issues in this case include many matters that are known, at least indirectly, to numerous people within the Applicant organization, its constituent partners, various utility companies, consultants, journalists, governmental agencies, and the general public. NIRS/PC decline to construe Rule 2.704(a) as calling upon parties to identify individuals outside their own organizations who have only indirect knowledge of disputed matters.

a. Michael Mariotte

Executive Director  
Nuclear Information and Resource Service  
1424 16<sup>th</sup> Street N.W., Suite 404  
Washington, D.C. 20036

- b. Joseph Malherek  
Policy Analyst  
Critical Mass Energy and Environment Program  
PUBLIC CITIZEN  
215 Pennsylvania Ave SE  
Washington, DC 20003
- c. Michele Boyd  
Critical Mass Energy and Environment Program  
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215 Pennsylvania Ave SE  
Washington, DC 20003
- d. Don Hancock  
Southwest Research and Information Center  
105 Stanford, S.E.  
Albuquerque, NM 87106
- e. Jim Riccio  
Greenpeace  
(202) 319-2487

2. Documents from the files of NIRS and Public Citizen relevant to disputed issues  
alleged with particularity in the pleadings are produced simultaneously.

3. A list of documents from the files of NIRS and Public Citizen that are withheld on  
grounds of privilege or other protection is attached to this submission.

Respectfully submitted,



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and

Public Citizen  
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(202) 588-1000

September 30, 2004

**Nuclear Information and Resource Service/Public Citizen**  
**Documents withheld under claim of privilege or protection from disclosure**  
**040930**

Date:	Author:	Recipients:	Subject:	Protection:
040401	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040401	Malherek	Lovejoy	Contentions; water	ACP; WP
040401	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040401	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040401	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040401	Malherek	Lovejoy	Contentions	ACP; WP
040401	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040402	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040402	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040402	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040402	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040402	Malherek	Lovejoy	Contentions; petition	ACP; WP
040402	Malherek	Lovejoy	Petition to intervene	ACP; WP
040402	Malherek	Lovejoy	Petition to intervene	ACP; WP
040402	Malherek	Lovejoy	Petition to intervene	ACP; WP
040402	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040402	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040402	Malherek	Lovejoy	Contentions; water	ACP; WP
040403	Malherek	Lovejoy	Contentions; accidents	ACP; WP
040403	Malherek	Lovejoy	Contentions; accidents	ACP; WP
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040405	Malherek	Lovejoy	Contentions	ACP; WP
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040405	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040405	Malherek	Lovejoy	Contentions	ACP; WP
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040405	Malherek	Lovejoy	Contentions	ACP; WP
040406	Malherek	Lovejoy, Boyd, Hauter, Hartman	Petition	ACP; WP
040406	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040406	Malherek	Lovejoy	Contentions	ACP; WP
040406	Malherek	Lovejoy, Boyd, Hauter	Contentions	ACP; WP
040415	Malherek	Lovejoy	ASLB	ACP; WP
040504	Malherek	Lovejoy, Boyd, Hauter	LES response	ACP; WP
040505	Malherek	Lovejoy	Reply	ACP; WP
040505	Malherek	Lovejoy	Reply	ACP; WP
040505	Malherek	Lovejoy	Reply	ACP; WP

040505	Malherek	Lovejoy	Extension requests	ACP; WP
040505	Malherek	Lovejoy	Reply	ACP; WP
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040507	Malherek	Lovejoy	Reply	ACP; WP
040507	Malherek	Lovejoy	Extensions	ACP; WP
040508	Malherek	Lovejoy	Reply; water	ACP; WP
040508	Malherek	Lovejoy	Reply; need	ACP; WP
040508	Malherek	Lovejoy	Reply	ACP; WP
040508	Malherek	Lovejoy	Extension	ACP; WP
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040510	Malherek	Lovejoy	Reply	ACP; WP
040511	Malherek	Lovejoy	Urenco data	ACP; WP
040519	Malherek	Lovejoy	Protective order	ACP; WP
040520	Malherek	Lovejoy, Boyd, Hauter	Protective order	ACP; WP
040521	Malherek	Lovejoy	Experts	ACP; WP
040525	Malherek	Lovejoy, Boyd, Hauter	Supplemental information	ACP; WP
040526	Malherek	Lovejoy, Boyd, Hauter	Supplemental information	ACP; WP
040527	Malherek	Lovejoy, Boyd, Hauter	Public comments	ACP
040527	Malherek	Lovejoy	Protective order	ACP; WP
040602	Malherek	Lovejoy	Litigation	ACP; WP
040603	Malherek	Lovejoy	Proprietary information	ACP; WP
040608	Malherek	Lovejoy	Contentions; accidents	ACP; WP
040609	Malherek	Lovejoy	Contentions; accidents	ACP; WP
040617	Malherek	Lovejoy	Contentions; accidents	ACP; WP
040621	Malherek	Lovejoy	Contentions; costs	ACP; WP
040707	Malherek	Lovejoy	Contentions; proliferation	ACP; WP
040709	Malherek	Lovejoy, Boyd, Hauter	Contentions; water	ACP; WP
040713	Malherek	Lovejoy	Proprietary data	ACP; WP
040806	Malherek	Lovejoy, Boyd, Hauter	Co-lead status	ACP; WP
040820	Malherek	Lovejoy, Boyd, Hauter	Commission session	ACP; WP
040825	Malherek	Lovejoy	Discovery	ACP; WP
040827	Malherek	Lovejoy	Motion for	ACP; WP

			reconsideration	
040827	Malherek	Lovejoy	Discovery	ACP; WP
040827	Malherek	Lovejoy	Discovery	ACP; WP
040830	Malherek	Lovejoy, Boyd	Discovery	ACP; WP
040830	Malherek	Lovejoy	Discovery	ACP; WP
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040830	Malherek	Lovejoy	Discovery	ACP; WP
040830	Malherek	Lovejoy	Discovery	ACP; WP
040830	Malherek	Lovejoy, Boyd	Discovery	ACP; WP
040901	Malherek	Lovejoy	USEC application	ACP; WP
040901	Malherek	Lovejoy	Contentions; DUF6	ACP; WP
040902	Malherek	Lovejoy	Referred issue	ACP; WP
040902	Malherek	Lovejoy	Referred issue	ACP; WP
040902	Malherek	Lovejoy	Discovery	ACP; WP
040902	Malherek	Lovejoy	Referred issue	ACP; WP
040902	Malherek	Lovejoy	Referred issue	ACP; WP
040907	Malherek	Lovejoy	Discovery	ACP; WP
040907	Malherek	Lovejoy	Discovery	ACP; WP
040907	Malherek	Lovejoy	Witnesses	ACP; WP
040907	Malherek	Lovejoy	Discovery	ACP; WP
040908	Malherek	Lovejoy, Boyd, Hauter	Witnesses	ACP; WP
040908	Malherek	Lovejoy	Discovery	ACP; WP
040908	Malherek	Lovejoy, Boyd, Hauter	Witnesses	ACP; WP
040909	Malherek	Lovejoy	Discovery	ACP; WP
040909	Malherek	Lovejoy	Discovery	ACP; WP
040910	Malherek	Lovejoy	Discovery	ACP; WP
040913	Malherek	Lovejoy	Discovery	ACP; WP
040913	Malherek	Lovejoy	Discovery	ACP; WP
040913	Malherek	Lovejoy	Discovery	ACP; WP
040913	Malherek	Lovejoy	Discovery	ACP; WP
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040913	Malherek	Lovejoy	Discovery	ACP; WP
040913	Malherek	Lovejoy	Discovery	ACP; WP
040913	Malherek	Lovejoy	Discovery	ACP; WP
040914	Malherek	Lovejoy	Discovery	ACP; WP
040915	Malherek	Lovejoy	Discovery	ACP; WP
040915	Malherek	Lovejoy	Discovery	ACP; WP
040401	Lovejoy	Malherek	Contentions; DUF6	ACP; WP
040420	Lovejoy	Malherek	Contentions	ACP; WP
040422	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Extension	ACP; WP
040422	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Extension	ACP; WP

040505	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Extensions	ACP, WP
040517	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Protective order	ACP, WP
040520	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Protective order	ACP; WP
040521	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Licensing process	ACP; WP
040521	Lovejoy	Malherek	Protective order	ACP; WP
040526	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Communications	ACP; WP
040528	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Protective order	ACP; WP
040528	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Proliferation	ACP; WP
040602	Lovejoy	Malherek	Litigation	ACP; WP
040603	Lovejoy	Mariotte, Hauter, Boyd, Malherek	Protective order	ACP; WP
040608	Lovejoy	Malherek	Contentions; accidents	ACP; WP
040610	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Contentions; accidents	ACP; WP
040611	Lovejoy	Malherek	Contentions; DUF6	ACP; WP
040618	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040623	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040628	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040702	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040706	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040706	Lovejoy	Mariotte, Hauter,	Contentions; costs	ACP; WP

040707	Lovejoy	Boyd, Malherek, Curran, Hancock Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Contentions; proliferation	ACP; WP
040707	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Contentions; costs	ACP; WP
040708	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040810	Lovejoy	Malherek	Discovery	ACP; WP
040816	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040816	Lovejoy	Hauter, Boyd, Malherek	Discovery	ACP; WP
040816	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Commission session	ACP; WP
040817	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Commission session	ACP; WP
040817	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock, Makhijani, Rice, Komanoff, Osterberg, Sheehan	Commission order	ACP; WP
040825	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040827	Lovejoy	Malherek	Discovery	ACP; WP
040827	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040828	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Legislation	ACP
040830	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Legislation	ACP
040830	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock	Discovery	ACP; WP
040831	Lovejoy	Malherek	USEC application	ACP; WP



040901	Lovejoy	Malherek	Contentions; DUF6	ACP; WP
040903	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock, Makhijani, Komanoff, Sheehan, Rice	DEIS	ACP; WP
040903	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock, Makhijani, Komanoff, Sheehan, Rice	Discovery	ACP; WP
040907	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Hancock	Witnesses	ACP; WP
040913	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock, Makhijani, Komanoff, Sheehan, Rice	Discovery	ACP; WP
040913	Lovejoy	Malherek	Discovery	ACP; WP
040913	Lovejoy	Malherek	Discovery	ACP; WP
040914	Lovejoy	Mariotte, Hauter, Boyd, Malherek, Curran, Hancock,	Discovery	ACP; WP
040706	Lovejoy	Boyd	Schedule	ACP; WP
040707	Lovejoy	Boyd	Witnesses	ACP; WP
040922	Komanoff	Makhijani, Mariotte	Witnesses	WP
040720	Mariotte	Makhijani	Contentions	WP
040921	Mariotte	Makhijani	Contentions, DUF6	WP
040818	Mariotte	Makhijani	Contentions, DUF6	WP
040608	Mariotte	Makhijani	Contentions, DUF6	WP
040923	Makhijani	Lovejoy, Mariotte, Hauter, Boyd, Malherek, Hancock, Curran, Komanoff, Rice, Sheehan, Brice	Interrogatories	WP
040923	Makhijani	Lovejoy, Mariotte, Hauter, Boyd, Malherek, Hancock, Curran, Komanoff, Rice, Sheehan,	Interrogatories	WP
040922	Makhijani	Lovejoy, Komanoff, Mariotte	Interrogatories	WP

040922	Makhijani	Lovejoy, Komanoff, Mariotte	Interrogatories	WP
040922	Makhijani	Komanoff, Mariotte	Interrogatories	WP
040922	Makhijani	Mariotte, Komanoff	Interrogatories	WP
040922	Makhijani	Lovejoy, Mariotte, Komanoff	Interrogatories	WP
040901	Makhijani	Lovejoy	Contention, DUF6	WP

Note: Dates are stated as YYMMDD. ACP = attorney-client privilege. WP = work product; trial preparation materials.

## CERTIFICATE OF SERVICE

Pursuant to 10 CFR § 2.305 the undersigned attorney of record certifies that on September 30, 2004, the foregoing Supplemental Disclosure Pursuant to 10 CFR 2.704(a) on behalf of Petitioners Nuclear Information and Resource Service and Public Citizen was served by electronic mail and by first class mail upon the following:

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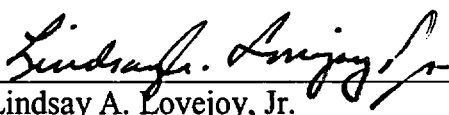
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