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November 14, 1997

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attn: Rulemaking and Adjudications Staff

Re: In the matter of Quivira Mining Co.
Docket No. 40-8905-MLA
ASLBP No. 97-728-04-MLA

Dear Rulemaking and Adjudications Staff:

Enclosed please find the original and two copies of Envirocare of Utah's Petition for Review of the Decision of Atomic Safety and Licensing Board in the above-titled matter. Please return a conformed copy in the enclosed stamped addressed envelope.

Under 10 CFR § 2.1205(o), an appeal may be taken of a presiding officer's denial of a request for a hearing by filing and serving upon all parties a statement that succinctly sets out, with supporting argument, the errors alleged. CFR Part 2, Subpart L provides no further guidance as to the procedures that the Nuclear Regulatory Commission (NRC) will follow in such an appeal. The general rules in 10 CFR Part 2, Subpart G apply to all non-rulemaking proceedings, and must be read in conjunction with the rules governing a particular proceeding. 10 CFR § 2.786(b)(4) sets forth the factors that the NRC should consider in deciding whether to grant review of a presiding officer's decision. If the NRC grants the petition for review, according to 10 CFR § 2.786(d) we expect the NRC will specify the issues to be reviewed and direct the briefing and argument schedule. Telephonic inquiries have not clarified the review procedure. Therefore, if the NRC intends to handle this appeal in a different manner, Envirocare requests that the NRC provide notice thereof to the parties. Envirocare requests an opportunity for full briefing and argument by all parties.

Finally, given the limited guidance provided by Subpart L, it is not entirely clear whether there is a page limit for Envirocare's Petition for Review. Envirocare has attempted to be succinct. If Envirocare has nonetheless exceeded the applicable page limit, Envirocare hereby requests leave to submit an overlength petition.

Thank you for your consideration of the Petition for Review.

Very truly yours,

Davis Wright Tremaine LLP

Lynda L. Brothers

Enclosures

cc: Charles Bechhoefer, Presiding Officer
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Dr. Peter S. Lam
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Office of Commission Appellate Adjudicatiion, NRC

THE UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of:	Docket No. 40-8905-MLA
QUIVIRA MINING CO. Ambrosia Lake Facility Grants, New Mexico	ASLBP No. 97-728-04-MLA
Amendment to Source Materials License No. SUA-1473	ENVIROCARE OF UTAH'S PETITION FOR REVIEW OF DECISION OF ATOMIC SAFETY AND LICENSING BOARD PANEL

Envirocare of Utah, Inc., ("Envirocare") submits this Petition for Review of the November 4, 1997, decision of the Atomic Safety and Licensing Board Panel ("ASLBP") which denied Envirocare's request for a hearing on an amendment to Quivira Mining Company's ("QMC") Source Materials License No. SUA-1473.

I. FACTUAL BACKGROUND.

QMC operated a uranium mill at its Ambrosia Lake site for decades under Source Materials License No. SUA-1473, and apparently ceased milling operations in 1985. Since 1986, QMC has asked the NRC for, and has received, 36 amendments to its milling license. On November 20, 1995, QMC applied for an amendment to its license to allow QMC to accept 10,000 cubic yards per generator per year of 11e.(2) byproduct material for disposal from unrestricted outside sources.[1] In effect, QMC's latest license application requested authority to operate its mill site as a commercial disposal facility for 11e.(2) material. The NRC granted QMC's application by issuance of License Amendment No. 37 (the "License Amendment").

[1] QMC had previously been allowed under several license amendments to accept limited amounts of 11e.(2) material from specifically-designated sources. Prior to the instant amendment, QMC had never been licensed as a general commercial facility for acceptance of waste from unspecified outside generators.

Despite this fundamental change in the nature of the facility, the NRC did not require full environmental review under the National Environmental Policy Act ("NEPA"), including preparation of an Environmental Impact Statement ("EIS"), when it approved the License Amendment. Envirocare seeks to challenge that omission.

Envirocare operates a commercial 11e.(2) disposal facility for receipt of radioactive materials from outside generators. In obtaining its license for disposal of 11e.(2) material, Envirocare was required to bear the cost of full environmental review of its facility under NEPA (including preparation of an EIS). In addition, the NRC required Envirocare to comply with certain requirements designed to protect the environment as a condition of licensure, including the requirements in 10 C.F.R. Part 40. It is unclear whether the NRC made QMC meet the same standards in approving QMC's License Amendment.

Envirocare requested a hearing pursuant to 10 CFR § 2.1205 on QMC's License Amendment and on the Finding of No Significant Impact ("FONSI") issued by the NRC for that amendment. Envirocare asserted standing under the Atomic Energy Act ("AEA"), NEPA, and the U.S. Constitution. In support of its request, Envirocare submitted detailed arguments in its Request for Hearing and its Supplement to Request for Hearing. The ASLBP concluded that Envirocare lacked standing and denied Envirocare's request for a hearing.

II. NRC REVIEW OF ASLBP DECISION.

In this case, NRC review of the ASLBP's decision is justified – and reversal of the ASLBP's decision is required – because the ASLBP's decision is contrary to established law. 10 CFR § 2.786(b)(4)(ii). Envirocare has demonstrated standing pursuant to established judicial concepts of standing under NEPA, the AEA, and the U.S. Constitution. The ASLBP erred in determining otherwise. Under 10 CFR § 2.1205(o), an appeal may be taken of a presiding

officer's denial of a request for a hearing by filing and serving upon all parties a statement that succinctly sets out, with supporting argument, the errors alleged.

III. THE ASLBP ERRED IN DETERMINING THAT ENVIROCARE LACKED STANDING UNDER NEPA.

To obtain standing under NEPA, a petitioner must demonstrate that its grievance "arguably fall[s] within the zone of interests to be protected or regulated by [NEPA]," and that the agency action challenged has caused it an "injury in fact." Bennett v. Spear, ___ U.S. ___, 117 S. Ct. 1154, 1161 (1997). Here, the ASLBP found that the environmental impacts that Envirocare alleged will occur at the Ambrosia Lake facility as the result of QMC's License Amendment "surely fall within the zone of interests protected by NEPA[.]" Memorandum and Order, In the Matter of Quivira Mining Co., Docket No. 40-8905-MLA, at 15 (November 4, 1997) ("ASLBP Order"). However, the ASLBP erred when it ruled that "the alleged environmental impacts of the Ambrosia Lake Facility must affect [Envirocare] directly in order to serve as a foundation for injury in fact [under NEPA]." See ASLBP Order at 15.

This ruling conflicts with established standing cases under NEPA holding that when a petitioner alleges that (1) it will suffer a direct economic injury from an agency action, and (2) the agency action will also have a "primary effect on the natural environment," the petitioner's injury is a sufficient "injury in fact" to confer standing. See Envirocare of Utah's Supplement to its Request for Hearing, Docket No. 40-8905-MLA, at 6-11 (July 3, 1997) ("Envirocare's Supplement"); see also County of Josephine v. Watt, 539 F. Supp. 696, 703-704 (N.D. Cal. 1982); Port of Astoria v. Hodel, 595 F.2d 467, 476 (9th Cir. 1979); Lake Erie Alliance v. United States Army Corps., 486 F. Supp. 707, 712 (W.D. Pa. 1980); Mobil Oil Corp. v. Federal Trade Comm'n, 430 F. Supp. 855, 862 (S.D.N.Y. 1977), reversed on other grounds, 562 F.2d 170 (2nd Cir. 1977). When economic injury is coupled with environmental impacts, the established law

requires no further showing that the alleged environmental impacts will directly affect the petitioner to demonstrate that the petitioner has suffered an "injury in fact" under NEPA. See id.

In coming to its contrary conclusion, the ASLBP misconstrued the governing case law. See ASLBP Order at 16-20. For example, the ASLBP cited Port of Astoria v. Hodel, 595 F.2d 467 (9th Cir. 1979), as a basis for its ruling. However, an examination of the facts and holding of that case reveals that they support Envirocare's position, not the ASLBP's ruling. In Port of Astoria, standing was affirmed for a private broadcasting company that alleged it would suffer economic harm due the construction of a power plant, which was subject to NEPA review. Id. at 476. The broadcasting company alleged that the construction of power lines would interfere with its broadcasts, and thereby cause it economic injury. Id. However, the broadcasting company also alleged that the construction of the power plant would impact the environment, and therefore warranted the preparation of an EIS under NEPA. Id. The court found that the broadcasting company had standing because its economic injury was "the direct and immediate result of the building of the [power plant], an action that 'will have a primary impact on the natural environment.'" Id.

The Port of Astoria court also found that the Port of Astoria did *not* have standing under NEPA. However, it did so because the Port was challenging an act that *had no impact* on the environment: the power company's decision not to build the power plant near the Port. Id. at 475. Although the Port of Astoria also alleged economic injuries (the loss of tax base and revenue and other financial guarantees the power company had allegedly made), the court denied standing to the Port because the Port's alleged economic injuries were not the direct result of an act that would impact the environment, but instead the result of an act that would have no impact on the environment (the *failure to build* the power plant near the Port). Id. Because the Port's

economic injury was caused by something that had no impact on the environment, the court found that its injuries were outside the zone of interests protected by NEPA. Id.; see also County of Josephine, 539 F. Supp. at 703-704 (interpreting Port of Astoria to deny standing to the Port because "the injurious action claimed was the removal of a proposed power plant to a different site, a happening which [sic] would have no direct environmental impact at all.")

The dispositive factor in Port of Astoria was that the alleged economic injury was directly caused by an action that impacted the environment, not that the petitioners were directly affected by the environmental impacts. Port of Astoria, 595 F.2d at 475-76. Indeed, it is not clear from the Port of Astoria decision whether the broadcasting company actually would have been directly affected by the negative environmental impacts of the power plant. Id. at 476 (court merely stated that the broadcasting company was situated in the same *county* as the proposed plant, not that it would actually be affected by the plant's alleged environmental impacts).

Neither Port of Astoria nor any of the other cases cited by the ASLBP require that a petitioner show that it will be directly and physically affected by the alleged environmental impacts of a project, as a prerequisite to standing under NEPA. Id.; see also County of Josephine, 539 F. Supp. at 704 ("standing is adequately alleged inasmuch as [petitioners] are causally affected by a matter of NEPA concern"); Western Radio Services Company, Inc. v. Espy, 79 F.3d 896, 902 (9th Cir. 1995), cert. denied, ___ U.S. ___, 117 S. Ct. 80 (1996) (denying standing because "[n]o one alleges that [the challenged] facility 'will have a primary impact on the natural environment,'" not because the environmental impacts alleged would not have a direct physical impact on the petitioner); Overseas Shipholding Group, Inc. v. Skinner, 767 F. Supp 287, 295 (D.D.C. 1991) (finding standing because the claims were not only economic, but "relate[d] to a significant public interest in reducing air and water pollution"). The ASLBP

misinterpreted these cases and committed error when it found that a showing of direct physical impact was required for Envirocare to satisfy the "injury in fact" test for standing under NEPA.[2] Id.

Standing has consistently been found in cases where there was no indication that the asserted environmental impacts would have a direct physical impact on the petitioner. Port of Astoria, 595 F.2d at 476; Chemical Leaman Tank Lines, Inc. v. United States, 368 F. Supp. 925 (D.Del. 1973) (finding a petitioner had standing because it alleged a general increase in air pollution from an ICC order increasing the number of carriers of waste commodities); Mobil Oil Corp. v. Federal Trade Comm'n, 430 F. Supp. 855 (S.D.N.Y. 1977).

In Mobil Oil, the court held that a group of oil companies had standing under NEPA to challenge a Federal Trade Commission ("FTC") order that required the oil companies to cease noncompetitive practices and divest themselves of certain pipelines and oil exploration and drilling leases. Mobil Oil, 430 F. Supp. at 862. The court's standing determination was based on the economic injuries that the oil companies asserted would flow from the FTC order, and their allegation that the FTC order would also cause environmental impacts. The alleged environmental impacts included "pollution of the environment," "a general increase in fuel consumption and pollution," and "the accidental spillage of oil or other toxic materials that involves environmental consequences to the land, water, and living organisms as well as affecting the aesthetic environment." Id. The court found that these allegations of economic injury caused by an action that has a significant impact on the environment, were "sufficient to

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[2] The ASLBP also erred in finding that a direct, physical environmental injury was required under the *injury in fact* prong of the standing analysis under NEPA. All of the cases that discuss a direct and immediate physical environmental impact on the petitioner do so in the context of the *zone of interest* prong of the test. See, e.g., County of Josephine, 539 F. Supp. at 704; Port of Astoria, 595 F.2d at 475.

confer standing" without any allegation that the oil companies would be directly, physically affected by the environmental impacts. Id.

As demonstrated by the foregoing authorities, the law only requires that a petitioner show that it would suffer a direct economic injury as a result of an agency action, and that the action will also have environmental impacts. Here, Envirocare has clearly made that showing by alleging: (1) that it will suffer a direct economic injury as a result of an agency action (the NRC's approval of QMC's License Amendment without requiring an EIS, while requiring Envirocare to bear the expense of a full EIS for its license), and (2) that the NRC's approval of the License Amendment without full environmental review will impact the environment. See Envirocare's Supplement at 6-10. Envirocare has therefore satisfied the current judicial test for standing under NEPA. See, e.g., Port of Astoria 595 F.2d at 476; Overseas Shipholding, 767 F. Supp. at 295; Mobil Oil, 430 F. Supp. at 862.[3]

Moreover, the ASLBP's conclusion that Envirocare has to demonstrate a direct economic injury as well as a direct physical environmental injury for standing under NEPA contradicts NEPA's broad remedial purposes:

> As long as the environmental concerns are not so insignificant that they ought to be disregarded altogether, courts generally do not disqualify a plaintiff from asserting a legal claim under NEPA because the impetus behind it may be economic. *Otherwise, the broad congressional purposes of the Act to ensure that environmental values are adequately protected would be defeated.*

Lake Erie v. United States Army Corps, 486 F.Supp. at 712 (emphasis added); see also Realty Income Trust v. Eckerd, 564 F.2d 447, 452 (D.C. Cir. 1977) (finding that to effectuate NEPA's

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[3] The only cases that do require a showing of direct physical environmental impact are those in which no economic injury is alleged. See Envirocare's Supplement at 10-11. As set forth in Envirocare's Supplement, a showing that the petitioner is directly and physically affected by the alleged environmental impacts is necessary when the environmental impacts themselves are the only asserted "injury in fact." Id. In contrast, where a direct economic injury is also alleged, no such showing is needed for standing under NEPA. Id. at 11.

broad goal of protecting environmental values, a petitioner should not be denied standing just because his "real" or "obvious" interest may be viewed as monetary).

The environmental concerns that Envirocare has raised here are surely not insignificant. QMC's Ambrosia Lake facility has documented seepage from the uranium tailings impoundment where QMC plans to dispose of 11e.(2) material. The facility's groundwater problems have been the subject of corrective action for eight years. See Envirocare's Supplement at 8-9; see also Request for Hearing of Envirocare of Utah, Inc., Docket No. 40-8905, at 7, ¶ 4.10 (May 28, 1997) ("Request for Hearing"). The importation of large quantities of commercial radioactive waste to this facility will likely exacerbate, not ameliorate, the existing environmental problems. Id. Additionally, there will be impacts associated with QMC's transportation and importation of large volumes of 11e.(2) material to the Ambrosia Lake facility. Id. Further, QMC obtained its source materials license and 36 amendments of that license without an EIS ever being performed. See Envirocare's Supplement at 8; Request for Hearing at 5, ¶ 4.4. NEPA simply does not allow projects to be piecemealed in this way in order to bypass full NEPA review. See Western Radio Services v. Glickman, 123 F.3d 1189, 1194 (9th Cir. 1997).

Established judicial standards for standing under NEPA require no greater showing than Envirocare has already made. Envirocare's direct economic injury results from the same NRC actions that authorize activities which will have a significant effect on the environment. These allegations are more than sufficient to confer standing upon Envirocare to challenge these actions under NEPA. Accordingly, Envirocare requests that the Commission grant Envirocare's Petition for Review.

IV. THE ASLBP ERRED IN DETERMINING THAT ENVIROCARE LACKED STANDING UNDER THE AEA.

To establish standing under the AEA, a petitioner must also show that it has suffered "injury in fact" and that its interests "arguably fall within the zone of interests protected or regulated by the statutory provision or constitutional guarantee invoked in the suit." Bennett v. Spear, supra. The ASLBP held that Envirocare had established "injury in fact" under the AEA, but that its interests did not fall within the zone of interests protected by the AEA. See ASLBP Order at 9-15. This ruling is erroneous for the following reasons.

In this case, Envirocare asserted an economic interest under the AEA, as a licensed 11e.(2) material disposal facility, in insuring that all licensees who propose to accept 11e.(2) material for disposal comply with applicable NRC standards. See Request for Hearing, ¶¶ 5.3.1, 5.3.2. The standards that the NRC applied to Envirocare are presumably the appropriate standards for acceptance and disposal of 11e.(2) material required by law. To the extent that QMC is not required to meet the same standards as was Envirocare, Envirocare is placed at a distinct competitive disadvantage. Yet, the ASLBP reasoned that, while certain types of alleged economic injury are within the zone of interests protected under amended Section 84 of the AEA, the competitive injury invoked by Envirocare was not considered by Congress in amending Section 84, and thus could not be a basis for standing. See ASLBP Order at 14.

The ASLBP's reasoning ignores the heart of Envirocare's standing argument under the AEA. See Envirocare's Supplement at 15-27. The Supreme Court has clearly recognized that there need be no indication of Congressional purpose to benefit a party in order for that party's interests to fall within the zone of interests protected by the statute in question. Clarke v. Securities Industry Ass'n, 479 U.S. 388, 399-400 (1987). Rather, parties come within the protected zone of interests *either* if they are intended beneficiaries of the statute *or* if their

interests, while not among those Congress intended to protect, coincide with the protected interests, making the parties "suitable challengers." Hazardous Waste Treatment Council v. Thomas, 885 F.2d 918, 922-23 (D.C. Cir. 1989).

Courts have frequently applied the "suitable challenger" doctrine where a statute establishes restrictions on entry into a market. In this situation, numerous courts have granted standing to parties who have an economic interest in confining competition within the statutory limits, even if their interests are not ones that Congress specifically intended to protect. See Schering Corp. v. Food and Drug Admin., 51 F.3d 390 (3d Cir. 1995), cert. denied, ___U.S.___, 116 S. Ct. 274 (1995); Community First Bank v. Nat'l Credit Union Admin., 41 F.3d 1050 (6th Cir. 1994); First Nat'l Bank & Trust Co. v. Nat'l Credit Union Admin., 988 F.2d 1272 (1993), cert. denied, 510 U.S. 907 (1993); Panhandle Producers & Royalty Owners Ass'n v. Economic Regulatory Admin., 822 F.2d 1105 (D.C. Cir. 1987); discussion in Envirocare's Supplement at 15-27. The rationale for this approach is that the very existence of the entry restriction reflects a Congressional judgment that the restriction furthers the statutory purpose; thus, the competitor's interest in enforcing the entry restriction bears some relation to the Congressional purpose by definition. First Nat'l Bank, 988 F.2d at 1278.

The instant case is indistinguishable for purposes of standing from the preceding entry-restriction cases. The NRC's licensing requirements for disposal of 11e.(2) byproduct material, implemented pursuant to 42 U.S.C. § 2114, constitute a classic example of a regulatory scheme for limiting entry into a market – in this case the 11e.(2) byproduct material disposal market. Thus, even assuming that the primary purpose of Congress in imposing these restrictions was to protect public health and safety, Envirocare's competitive economic interest in insuring that all licensees who propose to accept byproduct material for disposal comply with applicable NRC

standards furthers the statutory purpose. After all, the NRC's promulgation of standards for disposal of byproduct material represents a judgment that compliance with those standards will protect the public health and safety. Thus, by definition, Envirocare's interest in ensuring equal enforcement of those standards furthers the statutory purpose. Envirocare therefore has standing under the AEA to challenge QMC's License Amendment as a "suitable challenger," even though Envirocare may not have been an "intended beneficiary" of the statute.

The ASLBP completely failed to address this key argument. The section of the ASLBP's Order that addresses whether Envirocare's economic interest is within the zone of interests protected by the AEA lacks any discussion whatsoever of the "suitable challenger" cases cited by Envirocare. See ASLBP Order at 11-15. Instead, the ASLBP consigned its discussion of these cases to a footnote in another section of the Order which addresses injury in fact under NEPA. Moreover, in that footnote, the ASLBP characterizes these cases as "involv[ing] specific statutory provisions – not present here – allowing participation of competitors to further the intent of the particular statute to regulate a defined area of competition, without a direct connection to the physical or environmental impacts (if any) of the action under review." See ALSBP Order at 21 n.10.

The ASLBP's discussion of these important cases is completely inapposite for at least two reasons. First, it is misplaced in the section of the Order dealing with injury in fact under NEPA. The cases are only relevant to the AEA standing issue. Second, if the ASLBP is attempting to distinguish these cases in the context of standing under the AEA, it has failed to do so. Contrary to the ASLBP's footnote, the statutes in the cases cited by Envirocare did not contain special provisions allowing competitors to enforce the statutes' entry restrictions. If that had been the case, there would have been no reason for the lengthy analysis in those cases

concerning whether a party has standing as a "suitable challenger." The significance of the cases is that courts have granted standing to competitors on the ground that their economic interests made them suitable challengers.

In sum, the ASLBP's determination that Envirocare's economic interest is not within the zone of interests protected by the AEA, and that Envirocare therefore lacks standing under the AEA, was contrary to established law. The NRC should grant review of this determination, reverse it, and remand this case to the ASLBP for a hearing on QMC's license amendment.

V. THE ASLBP ERRED IN DETERMINING THAT ENVIROCARE LACKED STANDING UNDER THE U.S. CONSTITUTION.

The ASLBP also erred in finding that Envirocare lacked standing under the Substantive Due Process and Equal Protection Clauses of the Fifth and Fourteenth Amendments to the United States Constitution. See ASLBP Order at 23. Specifically, the ASLBP erred when it found that Envirocare had to make an affirmative showing that it was similarly situated with QMC, and therefore within the zone of interests protected by those two constitutional provisions. Id.

However, established judicial requirements dictate that "the determination of standing must be tested by the pleadings, which are to be taken as true, and not by the merits of the allegations[.]" Lake Erie Alliance v. United States Army Corps, 486 F. Supp. at 710. Therefore, the ASLBP was required to accept Envirocare's allegations that it is similarly situated with QMC as true, for the purposes of determining standing. Id.

Here, Envirocare alleged that it accepts 11e.(2) material for disposal from outside generators. See Envirocare's Supplement at 3-4; Request for Hearing at 3, ¶ 4.1. Envirocare also alleged that QMC will, under the License Amendment, accept 11e.(2) material for disposal

from outside generators.[4] See Envirocare's Supplement at 3-4; Request for Hearing, at 5-6, ¶¶ 4.5-4.6. Envirocare further alleged that, despite the fact that both facilities will be performing the same activity (i.e., the acceptance for disposal of 11e.(2) material from outside generators), they will not be subject to the same regulatory requirements. Id. The ASLBP was required to accept these allegations as true, and they are sufficient to confer standing on Envirocare for its constitutional claims. See Lake Erie Alliance, 486 F. Supp. at 710.

VI. CONCLUSION.

For the foregoing reasons, Envirocare respectfully requests (1) that the NRC grant review of the ASLBP's decision denying Envirocare's request for a hearing on QMC's License Amendment and the NRC's issuance of a FONSI for that amendment, (2) that the NRC, after full briefing and argument, determine that the ASLBP erred in determining that Envirocare lacked standing, and (3) that the NRC remand this case to the ASLBP for a hearing.

DATED this 14TH day of November, 1997.

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[4] This is clear from the face of the License Amendment, which grants authority for QMC to receive and dispose of 11e.(2) material from unrestricted outside sources.

THE UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the matter of:	Docket No. 40-8905-MLA
QUIVIRA MINING CO. Ambrosia Lake Facility Grants, New Mexico	ASLBP No. 97-728-04-MLA
Amendment to Source Materials License No. SUA-1473	

CERTIFICATE OF SERVICE

I, Edith M. Alexander, hereby certify that on November 14, 1997, copies of the foregoing document, ENVIROCARE OF UTAH INC.'S PETITION FOR REVIEW OF DECISION OF ATOMIC SAFETY AND LICENSING BOARD PANEL, have been served upon the following persons by U.S. mail, first class, postage prepaid, except as otherwise noted and in accordance with the requirements of 10 CFR Sec. 2.712.

Administrative Judge Charles Bechhoefer
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DATED this 14th day of November, 1997.

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