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97 JUN 12 A8:48

June 5, 1997

Ref: 08-814

SERVED JUN 12 1997

Shirley Ann Jackson, Chairman  
Kenneth C. Rogers, Commissioner  
Greta J. Dicus, Commissioner  
Nils J. Diaz, Commissioner  
Edward McGaffigan, Jr., Commissioner  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

RE: In the Matter of Louisiana Energy  
Services, Docket No. 70-3070-ML

Dear Chairman and Commissioners:

Enclosed is the Answer of Citizens Against Nuclear Trash ("CANT") to the petitions for Commission review of LBP-97-8 filed by Louisiana Energy Services ("LES") and the NRC Staff. This Answer is within the allowable combined total of 20 pages for responding to both petitions. (Also enclosed is the "Opposition of Citizens Against Nuclear Trash To The Motion By The Nuclear Energy Institute For Leave To File Amicus Answer To Petition By Applicant Louisiana Energy Services For Review Of LBP-97-8".)

At this time, five separate petitions for review in this proceeding are pending before the Commission. If any of the petitions are granted and briefing schedules are set, we ask the Commission to take into account certain factors.

First, both undersigned counsel for CANT have previously scheduled family obligations out of town during the entire month of August. Second, it is imperative that the subject of each petition be briefed separately. Each contested decision is quite lengthy, covering numerous legal and factual issues; thus, appellate briefs are likely to be lengthy. The most recent briefing of an appeal in this matter (LBP-96-25, pertaining to financial qualifications and NEPA issues), demonstrates the need to consider issues separately. In that instance, CANT was required to respond to briefs totalling nearly 120 pages filed by LES and the Nuclear Energy Institute and their considerable bevy of lawyers, as well as the NRC Staff. This same scenario is likely to occur with respect to each and every issue which is the subject of review, and it is simply not possible

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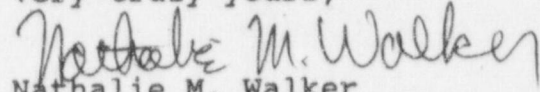
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NRC Commissioners  
June 5, 1997  
Page 2

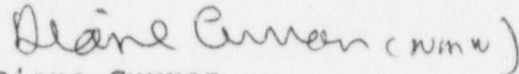
for undersigned counsel, who have very limited resources, to engage in simultaneous lengthy briefing of different issues.

Accordingly, should any of the five petitions for review be granted, we ask that these factors be taken into account by providing for briefing in seriatum, and with adequate preparation time that also permits undersigned counsel to honor their prior obligations. We appreciate your consideration of this matter.

Very truly yours,



Nathalie M. Walker  
SIERRA CLUB LEGAL DEFENSE FUND



Diane Curran  
HARMON CURRAN & SPIELBERG

cc: Eugene Holler  
Michael McGarry

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of

LOUISIANA ENERGY SERVICES, L.P.

(Claiborne Enrichment Center  
SNM License)

Docket No.(s) 70-3070-ML

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing LTR CANT TO COMM RE LBP-97-8 have been served upon the following persons by U.S. mail, first class, except as otherwise noted and in accordance with the requirements of 10 CFR Sec. 2.712.

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Washington, DC 20555

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Docket No.(s)70-3070-ML  
LTR CANT TO COMM RE LBP-97-8

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Dated at Rockville, Md. this  
12 day of June 1997

*Adria T. Byrdson*  
Office of the Secretary of the Commission