

**From:** [Robert Howarth](#)  
**To:** [Docket, Hearing](#); [Paul Bollwerk](#); [William Froehlich](#); [Sue Abreu](#)  
**Subject:** [External\_Sender] Proposed License Amendment Request, Nuclear Fuel Services, Docket No. 70-143  
**Date:** Sunday, January 22, 2023 5:26:37 PM

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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).

- 1) I support the demand to rigorously investigate ongoing chemical and radioactive poisoning of underground and surface water and that the effects by air currents transmission of these pollutants be included.
- 2) I support the necessity of a comprehensive assessment of the cumulative impacts on the environment of this 65 year-old plant.
- 3) I question and challenge the assumed legality of making new weapons material at a private company when U. S. and international law prohibit the proliferation of nuclear weapons. If nothing else this invites charges of hypocrisy, undercuts & helps defeat a U.S. touted goal of making us & our world a safer home for all.

Sincerely, /s/ Irma Howarth, MSW