

RAS 1688

~~UNITED CORRESPONDENCE~~

DOCKETED  
April 28, 2000

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'00 MAY -3 AM 11:17

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	
	)	
Northeast Nuclear Energy Company	)	Docket No. 50-423-LA-3
	)	
(Millstone Nuclear Power Station,	)	
Unit No. 3)	)	ASLBP No. 00-771-01-LA

NORTHEAST NUCLEAR ENERGY COMPANY'S SUPPLEMENTAL RESPONSE TO CONNECTICUT COALITION AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST MILLSTONE'S FIRST SET OF DOCUMENT PRODUCTION REQUESTS

Northeast Nuclear Energy Company ("NNECO") hereby files its supplemental response to the Connecticut Coalition Against Millstone ("CCAM") and the Long Island Coalition Against Millstone's ("CAM") (collectively, "Intervenors") "First Set of Interrogatories and Requests for Production" ("Intervenors' First Discovery Requests"), a facsimile of which was served on NNECO on March 21, 2000. NNECO's initial response, filed on April 4, 2000, was directed to the Intervenors' interrogatories; the second response, filed on April 20, 2000, was directed to Intervenors' document production requests. This supplemental response addresses General Interrogatory Nos. G - 2 and G - 3 (essentially requesting NNECO's witness list).

**I. GENERAL INTERROGATORIES**

**A. Interrogatory G - 2**

For each admitted contention, identify each person whom NNECO expects to provide sworn affidavits and declarations for the written filing for the Subpart K proceeding, and each person who would testify in any subsequent evidentiary hearing. For each person identified, describe that person's professional affiliation, address, area of professional expertise,

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qualifications, and educational and scientific experience. Also, describe the general subject matter on which each person is expected to provide sworn affidavits or testimony in the proceeding.

NNECO's Response: NNECO expects the following individuals to provide sworn affidavits or declarations for the written filing for the Subpart K proceeding, and testimony in any subsequent evidentiary hearing:

1. David W. Dodson, Licensing Supervisor, Millstone Nuclear Power Station, Rope Ferry Road, Waterford, CT 06385. Mr. Dodson has a bachelor of science degree in mechanical engineering more than 25 years of nuclear power experience in the U.S. Navy and commercial nuclear power. His areas of experience are licensing, design engineering, health physics, chemistry, outage management, and operations. He will provide sworn affidavits or testimony providing an overview of the license amendment application, the revisions made to the application, NNECO's responses to NRC Staff requests for additional information, and NNECO's positions on the contentions in this proceeding. He will also address the Intervenor's allegations that the past performance at Millstone suggests that NNECO will not in the future comply with spent fuel handling administrative controls. He will also address, as necessary, the relevance of any actual events at Millstone Station or elsewhere, on which the Intervenor intend to rely in support of its positions regarding Contentions 4, 5, and 6.
  
2. Joseph J. Parillo, Senior Engineer, Millstone Nuclear Power Station, Rope Ferry Road, Waterford, CT 06385. Mr. Parillo has a bachelor of science degree in nuclear engineering and more than 23 years of experience in the areas of nuclear criticality, reactor core design, spent fuel pool operations, and licensed operator training. He will provide sworn affidavits or testimony concerning criticality issues related to Contentions

- 4, 5, and 6, including relevant criticality calculations and analyses. He may also address the relevance of operating experience identified by the Intervenors as support for their contentions.
3. Michael C. Jensen, Supervisor, Reactor Engineering, Millstone Nuclear Power Station, Rope Ferry Road, Waterford, CT 06385. Mr. Jensen has more than 17 years of nuclear power experience at Millstone in the area of reactor engineering, including the management, movement and placement of fresh and spent nuclear fuel. He will provide sworn affidavits or testimony concerning the administrative controls relating to the Unit 3 spent fuel pool, including fuel movement and verification procedures. He may also address the relevance of any actual events at Millstone Station or elsewhere, on which the Intervenors intends to rely in support of its position regarding Contentions 4, 5, and 6.
  4. Robert G. McDonald, Primary Systems Chemist, Millstone Nuclear Power Station, Rope Ferry Road, Waterford, CT 06385. Mr. McDonald has a bachelor of science degree in chemical engineering and more than 18 years of nuclear power experience, including five and one half years in primary systems chemistry. He will provide sworn affidavits or testimony concerning the systems and procedures used at Millstone for managing the concentration of soluble boron in fuel pool water at Millstone Unit 3.
  5. Stanley E. Turner, Senior Vice President and Chief Nuclear Scientist, Holtec International, 138 Alt. 19 South, Palm Harbor, FL 34683. Dr. Turner has a Ph.D. in nuclear chemistry and is a registered Professional Engineer in the field of nuclear science. He has been performing nuclear criticality analyses for more than 42 years, including numerous criticality safety analyses for wet spent fuel storage rack installations. He will

provide sworn affidavits or testimony concerning the NNECO proposal, industry norms, the application of GDC 62, the criticality calculations prepared by Holtec for NNECO, and the adequacy of the criticality prevention controls proposed by NNECO in the March 19, 1999, license amendment request.

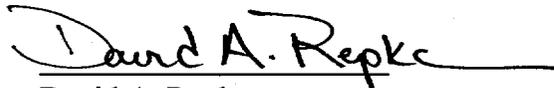
This witness list is subject to change as discovery proceeds and NNECO reviews material provided by the Intervenors. To the extent necessary, NNECO will supplement this response.

B. Interrogatory G – 3

For each person identified under Interrogatory G – 2, provide a list of all publications authored by the expert within the preceding 10 years, and a listing of any other cases in which the expert has testified as an expert at a trial or hearing, or by deposition within the preceding four years.

NNECO's Response: Neither Mr. Dodson, Mr. Parillo, Mr. Jensen, or Mr. McDonald has authored any publications within the preceding 10 years or testified as an expert at a trial or hearing, or by deposition within the preceding four years. Dr. Turner's publications and expert testimony are shown on Attachment A.

Respectfully submitted,

A handwritten signature in black ink that reads "David A. Repka". The signature is written in a cursive style with a long horizontal line extending to the right.

David A. Repka  
Donald P. Ferraro  
WINSTON & STRAWN  
1400 L Street, NW  
Washington, D.C. 20005-3502

Lillian M. Cuoco  
NORTHEAST UTILITIES SERVICE COMPANY  
107 Selden Street  
Berlin, Connecticut 06037

ATTORNEYS FOR NORTHEAST NUCLEAR  
ENERGY COMPANY

Dated in Washington, D.C.  
this 28th day of April 2000

## **Publications and Expert Testimony of Dr. Stanley E. Turner**

### Publications

- S.E. Turner, "Nuclear Criticality Safety Considerations in the Design of High Density Spent Fuel Storage Racks," Proceedings of a Workshop on the Use of Burnup Credit in Spent Fuel Transport Casks, Sandia Report (October 1989)
- S.E. Turner, "Storage of Burned PWR and BWR Fuel," ANS Meeting, Transactions p. 384 (November 15-19, 1987)
- S.E. Turner, "Nuclear Criticality Safety Considerations in the Design of High Density Spent Fuel Storage Racks," ASME/ANS Topical Meeting, Portland Oregon (1983)

### Expert Testimony

- Carolina Power and Light Company, Harris Plant (1999)
- Northeast Utilities Company, Millstone Unit 2 (1993)
- Florida Power and Light Company, St. Lucie Station (1990)
- Pacific Gas and Electric Company, Diablo Canyon Nuclear Station (1987)
- Florida Power and Light Company, Turkey Point Nuclear Power Plant (1984)

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '00 MAY -3 A11:18

In the Matter of: )  
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Northeast Nuclear Energy Company ) Docket No. 50-423<sup>A</sup>EA-3  
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(Millstone Nuclear Power Station, )  
Unit No. 3) ASLBP No. 00-771-01-LA

CERTIFICATE OF SERVICE

I hereby certify that copies of "NORTHEAST NUCLEAR ENERGY COMPANY'S SUPPLEMENTAL RESPONSE TO CONNECTICUT COALITION AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST MILLSTONE'S FIRST SET OF DOCUMENT PRODUCTION REQUESTS" in the captioned proceeding, have been served on the following by deposit in the United States mail, first class, this 28th day of April 2000. Additional e-mail service has been made this same day as shown below.

Nancy Burton, Esq.  
147 Cross Highway  
Redding Ridge, CT 06876  
(e-mail to: nancyburtonsq@hotmail.com)

Charles Bechhoefer  
Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
(e-mail to: cxb2@nrc.gov)

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
Attn: Rulemakings and Adjudications Staff  
(original + two copies)  
(e-mail to: HEARINGDOCKET@nrc.gov)

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

Adjudicatory File  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dr. Richard F. Cole  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
(e-mail to: rfc1@nrc.gov)

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

Ann P. Hodgdon, Esq.  
Office of the General Counsel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
(e-mail to: [aph@nrc.gov](mailto:aph@nrc.gov))

David Lochbaum  
Nuclear Safety Engineer  
Union of Concerned Scientists  
1616 P Street, NW  
Washington, DC 20036

Gordon Thompson, Ph.D.  
Institute for Resource and Security Studies  
27 Ellsworth Avenue  
Cambridge, MA 02139

A handwritten signature in black ink that reads "David A. Repka". The signature is written in a cursive style with a long horizontal line extending to the right.

David A. Repka  
Attorney for NNECO