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May 9, 2000

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'00 MAY 12 P2:58

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 SECOND  
SET OF INTERROGATORIES DIRECTED TO CONNECTICUT COALITION  
AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST MILLSTONE

By letter dated May 8, 2000, the Connecticut Coalition Against Millstone ("CCAM") and the Long Island Coalition Against Millstone ("CAM") (collectively, "Intervenors") identified Mr. James Plumb as a potential witness in this proceeding. Consistent with its first set of interrogatories dated March 6, 2000, Interrogatories G -1 through G - 3, Northeast Nuclear Energy Company ("NNECO"), has requested certain information on Intervenors' prospective witnesses. NNECO believes the Intervenors are under a duty to supplement their prior responses to answer these questions as they relate to Mr. Plumb. In addition, NNECO hereby requests the Intervenors to answer this second set of interrogatories fully, in writing, and under oath, within 14 days after service of this request pursuant to 10 C.F.R. § 2.740b.

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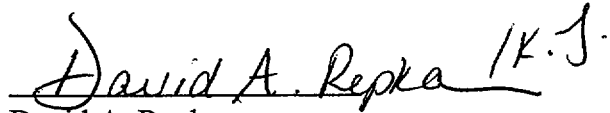
SECY-02

**I. Interrogatory G - 4**

With regard to Mr. Plumb, identify:

- A. his professional affiliation, address, area of professional expertise, qualifications, and educational and scientific experience;
- B. the contentions for which he will provide testimony, and in detail, the subject matter of his sworn affidavit and declaration for the written filing for the Subpart K proceeding, and in any subsequent evidentiary hearing;
- C. the specific events and allegations he intends to rely upon as a basis for his sworn affidavit and declaration; and
- D. the specific documents he intends to rely upon as a basis for his sworn affidavit and declaration for the written filing for the Subpart K proceeding, and in any subsequent evidentiary hearing.

Respectfully submitted,

 /K.J.

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Donald P. Ferraro  
WINSTON & STRAWN  
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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 9th day of May 2000

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of:

Northeast Nuclear Energy Company

(Millstone Nuclear Power Station,  
Unit No. 3)

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Docket No. 50-423-LA-3

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NORTHEAST NUCLEAR ENERGY COMPANY'S SECOND SET OF INTERROGATORIES DIRECTED TO CONNECTICUT COALITION AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST MILLSTONE" in the captioned proceeding, have been served on the following by deposit in the United States mail, first class, this 9th day of May 2000. Additional e-mail service has been made this same day as shown below.

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U.S. Nuclear Regulatory Commission  
Washington, DC 20555  
Attn: Rulemakings and Adjudications Staff  
(original + two copies)  
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Dr. Charles N. Kelber  
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Adjudicatory File  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

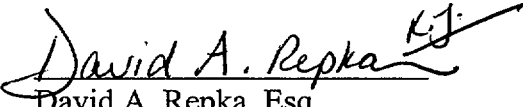
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