

May 19, 2000

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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)	)	
	)	

NRC STAFF'S FIRST SUPPLEMENTAL RESPONSE TO CONNECTICUT COALITION  
AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST MILLSTONE'S  
FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION  
DIRECTED TO U.S. NUCLEAR REGULATORY COMMISSION

The Nuclear Regulatory Commission staff (Staff) hereby files this first supplement to Staff's Response to Connecticut Coalition Against Millstone and Long Island Coalition Against Millstone's First Set of Interrogatories and Requests for Production, filed April 10, 2000.

II. GENERAL INTERROGATORIES

GENERAL INTERROGATORY G-2. For each admitted contention, identify each person whom NRC 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, qualifications, and subject matter on which each person is expected to provide sworn affidavits or testimony in the proceeding.

STAFF RESPONSE:

Laurence Kopp  
Senior Reactor Engineer  
General subject matter: All contentions

Secy-034

Anthony Attard  
Reactor Physicist  
General subject matter: All contentions

James C. Linville, Jr.  
Acting Director, Millstone Inspection Directorate  
General subject matter: Contention 4

A copy of Mr. Linville's resume is annexed hereto as Attachment 1. The Staff reserves the right to amend this answer.

GENERAL 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.

STAFF RESPONSE:

James C. Linville  
Publications: none  
Testimony within four years: none

The Staff reserves the right to amend this answer.

Respectfully submitted,



Brooke D. Poole  
Counsel for NRC Staff

Dated at Rockville, Maryland  
this 19<sup>th</sup> day of May, 2000

## **ATTACHMENT 1**

James C. Linville Jr.

EDUCATION      Drexel University, Philadelphia, Pennsylvania, MBA, 1987.

U. S. Naval Academy, Annapolis, Maryland, BS, 1970.

EXPERIENCE      U. S. NUCLEAR REGULATORY COMMISSION, 1980-2000

Acting Director, Millstone Inspection Directorate  
Branch Chief/Section Chief/Technical Assistant , Division of Reactor Projects,  
Region I, King of Prussia, Pennsylvania, 1985-Present.  
Managed inspection program at up to 10 commercial power  
reactors with a staff of up to 25 including 19  
professionals and 5 clerical at up to 5 field offices.

Senior Resident Inspector, Salem Nuclear Generating  
Station (PWR), Hancocks Bridge, New Jersey, 1983-1985.

Senior Resident Inspector/Resident Inspector, James A.  
FitzPatrick Nuclear Power Plant (BWR), Scriba, New York,  
1980-1983.

STONE AND WEBSTER ENGINEERING CORPORATION, 1977-1980

Licensing Engineer/Design Review Coordinator, Cherry Hill,  
New Jersey for Nine Mile Point Unit 2 BWR project.

U. S. NAVY, 1970-1977

Assistant Professor of Naval Science, NROTC Unit, University  
of California, Berkeley, California, 1975-1977.

Various Engineering and Weapons Department positions aboard  
nuclear powered cruiser USS Bainbridge during reactor  
refueling overhaul and power operations at sea, 1971-1975.  
Supervised operation and maintenance of dual nuclear power  
plants as Engineering Officer Of the Watch. Qualified to head  
Engineering Department.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S FIRST SUPPLEMENTAL RESPONSE TO CONNECTICUT COALITION AGAINST MILLSTONE AND LONG ISLAND COALITION AGAINST MILLSTONE'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION DIRECTED TO U.S. NUCLEAR REGULATORY COMMISSION" in the above-captioned proceeding have been served on the following through deposit in the Nuclear Regulatory Commission's internal mail system or; by deposit in the Nuclear Regulatory Commission's internal mail system with copies of electronic mail, as indicated by an asterisk; or by E-mail as indicated by a double asterisk, followed by a conforming copy via first-class mail this 19th day of May, 2000.

Charles Bechhoefer, Chairman\*  
Administrative Judge  
Atomic Safety and Licensing Board  
Mail Stop: T 3F-23  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
(E-Mail copy to [CXB2@nrc.gov](mailto:CXB2@nrc.gov))

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Dr. Richard F. Cole  
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Office of the Secretary\*  
ATTN: Rulemaking and Adjudications Staff  
Mail Stop: O 16-C-1  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001  
(E-Mail copy to [HEARINGDOCKET@nrc.gov](mailto:HEARINGDOCKET@nrc.gov))

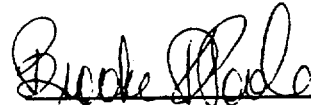
Office of the Commission Appellate  
Adjudication  
Mail Stop: O 16-C-1  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

Atomic Safety and Licensing Board Panel  
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