

RECEIVED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of: : Docket No. 50-423-LA-3'00 JUN -8 P3:31  
Northeast Nuclear Energy Company :  
(Millstone Nuclear Power Station, :  
Unit No. 3) : ASLBP No. 00-771-01-LA

CONNECTICUT COALITION AGAINST MILLSTONE AND  
LONG ISLAND COALITION AGAINST MILLSTONE  
RESPONSE TO NORTHEAST NUCLEAR ENERGY COMPANY'S  
SECOND SET OF INTERROGATORIES

The Connecticut Coalition Against Millstone ("CCAM") and Long Island Coalition Against Millstone ("CAM") (collectively, the "Intervenors") herewith respond to Northeast Nuclear Energy Company's ("NNECO") Second Set of Interrogatories dated May 9, 2000, as follows:

**Interrogatory G-4**

With regard to Mr. Plumb, identify:

- A. His professional affiliation, address, area of professional expertise, qualifications, and educational and scientific experience.**

James Plumb worked as a chemistry technician at the Millstone Nuclear Power Generating Station until he was fired in January 1996. Prior to his work at Millstone, Mr. Plumb had experience at other commercial nuclear reactors, including Three Mile Island.

Mr. Plumb's last-known permanent address is: P.O. Box 159, Voluntown, Connecticut 06384.

Mr. Plumb has a degree from Syracuse University.

- 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.**

Template = SECY-035

SECY-02

Mr. Plumb is expected to provide testimony in support of Contentions 4 and 5.

Mr. Plumb is expected to provide information regarding his personal knowledge of personnel and operations of the Millstone Nuclear Power Generating Station.

**C. The specific events and allegations he intends to rely upon as a basis for his sworn affidavit and declaration.**

Mr. Plumb is expected to rely on the specific events and allegations set forth in the complaint in James Plumb v. Northeast Nuclear Energy Company, CV 96 0537748 (Superior Court, State of Connecticut, Judicial District of New London); the specific events and allegations set forth in the complaint in Arthur J. Rocque, Jr., Commissioner, Department of Environmental Protection, v. Northeast Utilities Service Company et al, CV 97 0575567 (Superior Court, State of Connecticut, Judicial District of Hartford); the specific events and allegations set forth in United States of America v. Northeast Nuclear Energy Company et al, Criminal No. 3:99-CR-211 (RNC), United States District Court, District of Connecticut (Information and Government's Version of the Offenses); the subject matter of OIG Report 99-01s; and prosecutorial activities of the U.S. Department of Justice vis-a-vis current management and staff of the Millstone Nuclear Power Generating Station; all of the above as pertaining to Contentions 4 and 5.


**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.**

Mr. Plumb is expected to rely upon the public records pertaining

to the specific events and allegations identified in "C" above.

**CONNECTICUT COALITION AGAINST MILLSTONE  
LONG ISLAND COALITION AGAINST MILLSTONE**

By:

  
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Nancy Burton, Esq.  
147 Cross Highway  
Redding Ridge CT 06876  
Tel. 203-938-3952

Dated at Redding, Connecticut  
this 2d day of June, 2000.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Connecticut Coalition Against Millstone and Long Island Coalition Against Millstone Response to Northeast Nuclear Energy Company's Second Set of Interrogatories" in the above-captioned proceedings have been served on the following by deposit in the United States Mail, first class, this second day of June, 2000 and, in addition, telefaxed to David A. Repka, Esq., on June 2, 2000:

David A. Repka, Esq.  
Winston & Strawn  
1400 L Street NW  
Washington DC 20555

Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington DC 20555  
(Attn: Rulemakings and  
Adjudications Staff)  
(original + two copies)

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

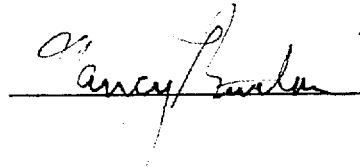
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Appellate Adjudication  
U.S. Nuclear Regulatory Commission  
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Charles Bechhoefer  
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Atomic Safety and Licensing Board  
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Administrative Judge  
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