

RAS 2209

**RELATED CORRESPONDENCE**  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

September 20, 2000  
**DOCKETED 9/21/00**

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
Carolina Power & Light Company	)	Docket No. 50-400-OLA
	)	
(Shearon Harris Nuclear Power Plant)	)	ASLBP No. 99-762-02-LA
	)	

NRC STAFF'S SECOND SUPPLEMENTAL RESPONSE TO ORANGE COUNTY'S  
FIRST SET OF ENVIRONMENTAL DISCOVERY REQUESTS  
DIRECTED TO NRC STAFF

Pursuant to agreement of the parties, the Nuclear Regulatory Commission staff (Staff) hereby files its second supplemental response to Orange County's<sup>1</sup> First Set of Environmental Discovery Requests Directed to NRC Staff, filed August 21, 2000.

The Staff hereby supplements its responses to interrogatories as follows.

**GENERAL INTERROGATORY No. 2.**

For Contention EC-6, give the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person whom the NRC Staff expects to call as a fact or expert witness at the hearing and/or whose affidavit/declaration the Staff expects to submit in the Subpart K proceeding described in the Board's August 7, 2000, Memorandum and Order. For expert witnesses, provide a list of all publications authored by the witness within the preceding ten years and a listing of any other cases in which the witness has provided expert trial or deposition testimony or submitted affidavit(s) or declaration(s) within the preceding four years. For purposes of answering this interrogatory, the educational and scientific experience of expected affiants and declarants may be provided by a resume of the person attached to the response.

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<sup>1</sup> Hereinafter "BCOC."

STAFF'S RESPONSE:

The Staff provides the following as persons who will provide sworn affidavits or declarations in this proceeding:

Christopher Gratton  
Reactor Systems Engineer  
Division of Systems Safety and Analysis  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Stephen LaVie  
Health Physicist  
Division of Systems Safety and Analysis  
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Gareth Parry  
Senior Level Advisor for Probabilistic Risk Analysis  
Division of Systems Safety and Analysis  
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A copy of the resume of each person named in this answer was previously provided. The Staff reserves the right to amend this answer as discovery continues.

Respectfully submitted,

Susan L. Uttal */RA/*  
Counsel for NRC Staff

Dated at Rockville, Maryland  
this 20th day of September 2000

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
)  
CAROLINA POWER & LIGHT COMPANY ) Docket No.50-400-LA  
) ASLBP No. 99-762-02-LA  
(Shearon Harris Nuclear Power Plant) )  
)

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S SECOND SUPPLEMENTAL RESPONSE TO ORANGE COUNTY'S FIRST SET OF ENVIRONMENTAL DISCOVERY REQUESTS DIRECTED TO NRC STAFF" in the above-captioned proceeding have been served on the following through deposit in the NRC's internal mail system, or by deposit in the NRC's internal mail system, with copies by electronic mail, as indicated by an asterisk, or by deposit in U.S. Postal Service as indicated by double asterisk, with copies by electronic mail as indicated this 20<sup>TH</sup> day of September, 2000:

G. Paul Bollwerk, III, Chairman\*  
Administrative Judge  
Atomic Safety and Licensing Board  
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