

RAS 2193

~~RETAINED CORRESPONDENCE~~

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USMRC

September 13, 2000

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**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
Before the Atomic Safety and Licensing Board**

OFFICE OF COMM. ...  
FILING ...  
ADJUDICATORY ...

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

**ORANGE COUNTY'S RESPONSE TO INTERROGATORIES  
CONTAINED IN APPLICANT'S FIRST SET OF DISCOVERY  
REQUESTS REGARDING CONTENTION EC-6**

Orange County hereby responds to the interrogatories contained in the Applicant's First Set of Discovery Requests Regarding Contention EC-6 Directed to the Orange County Board of Commissioners (August 30, 2000) ("Applicant's First EC-6 Discovery Requests").

**I. GENERAL OBJECTIONS**

These general objections apply to the County's responses to all of the Applicant's First EC-6 Discovery Requests.

1. The County objects to Applicant's instructions and definitions on the grounds and to the extent that they request or purport to impose upon the County any obligation to respond in manner or scope beyond the requirements set forth in 10 C.F.R. §§ 2.740, 2.741 and 2.742.

Template = SECY-035

SECY-02

2. The County objects to Applicant's discovery requests to the extent that they request discovery of information or documents protected under the attorney-client privilege, the attorney work product doctrine, and limitations on discovery of trial preparation materials and experts' knowledge or opinions set forth in 10 C.F.R. § 2.740 or other protection provided by law. The County will provide the Applicant with a Privilege Log that identifies documents subject to these privileges and protections, which the County reserves the right to supplement.

3. The County objects to Applicant's discovery requests to the extent they seek discovery beyond the scope of Contention EC-6, as admitted by the Board in this proceeding. 10 C.F.R. § 2.740(b).

4. Orange County is in the process of developing its evidentiary case in this proceeding, and anticipates that it will obtain more relevant information through discovery against the Applicant. Therefore, the County anticipates that it will need to supplement its responses to these discovery requests. The County hereby reserves the right to rely upon any and all additional documents and information that it may discover, and reserves the right to supplement or modify its responses to the applicant's discovery requests to incorporate any additional information or documents, as provided by 10 C.F.R. § 2.740(e).

## **II. RESPONSE TO GENERAL INTERROGATORIES**

**GENERAL INTERROGATORY NO. 1.** State the name, business address, and job title of each person who supplied information for responding to these

interrogatories, requests for admission, and requests for the production of documents. Specifically note for which interrogatories and requests for admissions each such person supplied information. For requests for production, note for which contention each such person supplied information.

**ORANGE COUNTY'S RESPONSE:** In addition to counsel for Orange County,

answers to these interrogatories were provided by:

Dr. Gordon Thompson  
Executive Director  
Institute for Resource and Security Studies  
27 Ellsworth Avenue  
Cambridge, MA 02139

**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 BCOC expects to provide sworn affidavits and declarations in the written filing for the Subpart K proceeding described in the Board's August 7, 2000, Memorandum and Order and the general subject matter on which each person is expected to provide sworn affidavits and declarations for the written filing. 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.

**ORANGE COUNTY'S RESPONSE:** Orange County expects to provide a sworn declaration in the Subpart K proceeding by Dr. Gordon Thompson. Dr. Thompson's declaration will further support the assertions made in Contention EC-6. A copy of his resume is attached.

**GENERAL INTERROGATORY NO. 3.** For contention EC-6, identify each expert on whom BCOC intends to rely on in its written filing for the Subpart K proceeding described in the Board's August 7, 2000 Memorandum and Order, the general subject matter on which each expert is expected to provide sworn affidavits and declarations for the written filing, the qualifications of each expert whom BCOC expects to provide sworn affidavits and declarations for the written filing, a list of all publications authored by the expert within the preceding ten years, and a listing of any other cases in which the

person has testified as an expert at a trial, hearing or by deposition within the preceding four years.

**ORANGE COUNTY'S RESPONSE:** Orange County expects to rely on the expert declaration of Dr. Gordon Thompson in the Subpart K proceeding. Dr. Thompson's declaration will provide further support for the assertions made in Contention EC-6.

The County previously provided a list of publications authored by Dr. Thompson within the preceding ten years, in Orange County's Objections to Applicant's First Set of Discovery Requests and Response to Applicant's First Set of Interrogatories (August 30, 1999). In addition, between August 30, 1999, and the present date, Dr. Thompson authored the following publications:

"Hazard Potential of the La Hague Site: An Initial Review (May, 2000).

"High-level Radioactive Liquid Waste at Sellafield: An Updated Review (June 2000)

Copies of these reports will be produced in response to the Applicant's document production request.

In its August 30, 1999, discovery response, the County also provided a list of proceedings in which Dr. Thompson had testified as an expert at a trial, hearing or by deposition within the preceding four years. In addition, between August 30, 1999, and the present date, Dr. Thompson delivered deposition testimony on May 10, 2000, in a license amendment proceeding for Millstone Unit 3, Docket No. 50-423-LA-3.

Respectfully submitted,



Diane Curran

Harmon, Curran, Spielberg & Eisenberg

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September 13, 2000

# INSTITUTE FOR RESOURCE AND SECURITY STUDIES

## Curriculum Vitae: GORDON R. THOMPSON

July 2000

### Professional expertise

Consulting technical and policy analyst in the fields of energy, environment, sustainable development, and international security.

### Education

- D.Phil. in applied mathematics, Oxford University (Balliol College), 1973.
- B.E. in mechanical engineering, University of New South Wales, Sydney, Australia, 1967.
- B.Sc. in mathematics & physics, University of New South Wales, 1966.

### Current appointment

- Executive director, Institute for Resource & Security Studies (IRSS), Cambridge, MA.

### Project sponsors and tasks (selected)

- Massachusetts Water Resources Authority, 2000: evaluated risks associated with water supply and wastewater systems that serve greater Boston.
- Canadian Senate, Energy & Environment Committee, 2000: reviewed risk issues associated with the Pickering Nuclear Generating Station.
- Greenpeace International, Amsterdam, 2000: reviewed impacts associated with the La Hague nuclear complex in France.
- Orange County, NC, 1999-2000: assessed safety issues associated with spent fuel storage at the Harris nuclear plant.
- Government of Ireland, 1998-2000: developed framework for assessment of impacts and alternative options associated with the Sellafield nuclear complex in the UK.
- Clark University, Worcester, MA, 1998-1999: participated in review of a foundation's grant-making related to climate change.
- UN High Commissioner for Refugees, 1998: developed a strategy for conflict management in the CIS region.

*Curriculum Vitae for Gordon R. Thompson*  
*July 2000*

- General Council of County Councils (Ireland), W Alton Jones Foundation (USA), and Nuclear Free Local Authorities (UK), 1996- 1998: assessed safety and economic issues of nuclear fuel reprocessing in the UK; assessed alternative options.
- Environmental School, Clark University, Worcester, MA, 1996: session leader at the Summer Institute, "Local Perspectives on a Global Environment".
- Greenpeace Germany, Hamburg, 1995-1996: a study on war, terrorism and nuclear power plants.
- HKH Foundation, New York, and Winston Foundation for World Peace, Washington, DC, 1994-1996: studies and workshops on preventive action and its role in US national security planning.
- Carnegie Corporation of New York, Winston Foundation for World Peace, Washington, DC, and others, 1995: collaboration with the Organization for Security and Cooperation in Europe to facilitate improved coordination of activities and exchange of knowledge in the field of conflict management.
- World Bank, 1993-1994: a study on management of data describing the performance of projects funded by the Global Environment Facility (joint project of IRSS and Clark University).
- International Physicians for the Prevention of Nuclear War, 1993-1994: a study on the international control of weapons-usable fissile material.
- Government of Lower Saxony, Hannover, Germany, 1993: analysis of standards for radioactive waste disposal.
- University of Vienna (using funds supplied by the Austrian government), 1992: review of radioactive waste management at the Dukovany nuclear plant, Czech Republic.
- Sandia National Laboratories, 1992-1993: advice to the US Department of Energy's Office of Foreign Intelligence.
- US Department of Energy and Battelle Pacific Northwest Laboratories, 1991-1992: advice for the Intergovernmental Panel on Climate Change regarding the design of an information system on technologies that can limit greenhouse gas emissions (joint project of IRSS, Clark University and the Center for Strategic and International Studies).
- Winston Foundation for World Peace, Boston, MA, and other funding sources, 1992-1993: development and publication of recommendations for strengthening the International Atomic Energy Agency.
- MacArthur Foundation, Chicago, IL, W. Alton Jones Foundation, Charlottesville, VA, and other funding sources, 1984-1993: policy analysis and public education on a "global approach" to arms control and disarmament.

*Curriculum Vitae for Gordon R. Thompson*  
*July 2000*

- Energy Research Foundation, Columbia, SC, and Peace Development Fund, Amherst, MA, 1988-1992: review of the US government's tritium production (for nuclear weapons) and its implications.
- Coalition of Environmental Groups, Toronto, Ontario (using funds supplied by Ontario Hydro under the direction of the Ontario government), 1990-1993: coordination and conduct of analysis and preparation of testimony on accident risk of nuclear power plants.
- Greenpeace International, Amsterdam, Netherlands, 1988-1990: review of probabilistic risk assessment for nuclear power plants.
- Bellerive Foundation, Geneva, Switzerland, 1989-1990: planning for a June 1990 colloquium on disarmament and editing of proceedings.
- Iler Research Institute, Harrow, Ontario, 1989-1990: analysis of regulatory response to boiling-water reactor accident potential.
- Winston Foundation for World Peace, Boston, MA, and other funding sources, 1988-1989: analysis of future options for NATO (joint project of IRSS and the Institute for Peace and International Security).
- Nevada Nuclear Waste Project Office, Carson City, NV (via Clark University, Worcester, MA), 1989-1990: analyses of risk aspects of radioactive waste management and disposal.
- Ontario Nuclear Safety Review (conducted by the Ontario government), Toronto, Ontario, 1987: review of safety aspects of CANDU reactors.
- Washington Department of Ecology, Olympia, WA, 1987: analysis of risk aspects of a proposed radioactive waste repository at Hanford.
- Natural Resources Defense Council, Washington, DC, 1986-1987: preparation of testimony on hazards of the Savannah River Plant.
- Lakes Environmental Association, Bridgton, ME, 1986: analysis of federal regulations for disposal of radioactive waste.
- Greenpeace Germany, Hamburg, 1986: participation in an international study on the hazards of nuclear power plants.
- Three Mile Island Public Health Fund, Philadelphia, PA, 1983-1989: studies related to the Three Mile Island nuclear plant.
- Attorney General, Commonwealth of Massachusetts, Boston, MA, 1984-1989: analyses of the safety of the Seabrook nuclear plant.
- Union of Concerned Scientists, Cambridge, MA, 1980-1985: studies on energy demand and supply, nuclear arms control, and the safety of nuclear installations.
- Conservation Law Foundation of New England, Boston, MA, 1985: preparation of testimony on cogeneration potential at a Maine papermill.
- Town & Country Planning Association, London, UK, 1982-1984: coordination and conduct of a study on safety and radioactive waste implications of the proposed Sizewell nuclear plant.

*Curriculum Vitae for Gordon R. Thompson*  
*July 2000*

- US Environmental Protection Agency, Washington, DC, 1980-1981: assessment of the cleanup of Three Mile Island Unit 2 nuclear plant.
- Center for Energy & Environmental Studies, Princeton University, Princeton, NJ, and Solar Energy Research Institute, Golden, CO, 1979-1980: studies on the potentials of renewable energy sources.
- Government of Lower Saxony, Hannover, FRG, 1978-1979: coordination and conduct of studies on safety aspects of the proposed Gorleben nuclear fuel cycle center.

Other experience (selected)

- Principal investigator, project on "Exploring the Role of 'Sustainable Cities' in Preventing Climate Disruption", involving IRSS and three other organizations, 1990-1991.
- Visiting fellow, Peace Research Centre, Australian National University, 1989.
- Principal investigator, Three Mile Island emergency planning study, involving IRSS and Clark University, Worcester, MA, 1987-1989.
- Co-leadership (with Paul Walker) of a study group on nuclear weapons proliferation, Institute of Politics, Harvard University, 1981.
- Foundation (with others) of an ecological political movement in Oxford, UK, which contested the 1979 Parliamentary election.
- Conduct of cross-examination and presentation of evidence, on behalf of the Political Ecology Research Group, at the 1977 Public Inquiry into proposed expansion of the reprocessing plant at Windscale, UK.
- Conduct of research on plasma theory (while a PhD candidate), as an associate staff member, Culham Laboratory, UK Atomic Energy Authority, 1969-1973.
- Service as a design engineer on coal-fired plants, New South Wales Electricity Commission, Sydney, Australia, 1968.

Publications (selected)

- *Hazard Potential of the La Hague Site: An Initial Review*, a report for Greenpeace International, May 2000.
- *A Strategy for Conflict Management: Integrated Action in Theory and Practice* (with Paula Gutlove), Working Paper No. 7, IRSS, Cambridge, MA, March 1999.
- *Risks and Alternative Options Associated with Spent Fuel Storage at the Shearon Harris Nuclear Power Plant*, a report for Orange County, NC, February 1999.

*Curriculum Vitae for Gordon R. Thompson*  
July 2000

- *High Level Radioactive Liquid Waste at Sellafield: Risks, Alternative Options and Lessons for Policy*, IRSS, Cambridge, MA, June 1998.
- "Science, democracy and safety: why public accountability matters", in F. Barker (ed), *Management of Radioactive Wastes: Issues for local authorities*, Thomas Telford, London, 1998.
- "Conflict Management and the OSCE" (with Paula Gutlove), *OSCE/ODIHR Bulletin*, Volume 5, Number 3, Fall 1997.
- *Safety of the Storage of Liquid High-Level Waste at Sellafield* (with Peter Taylor), Nuclear Free Local Authorities, UK, November 1996.
- *Assembling Evidence on the Effectiveness of Preventive Actions, their Benefits, and their Costs: A Guide for Preparation of Evidence*, IRSS, Cambridge, MA, August 1996.
- *War, Terrorism and Nuclear Power Plants*, Working Paper No. 165, Peace Research Centre, Australian National University, Canberra, October 1996.
- "The Potential for Cooperation by the OSCE and Non-Governmental Actors on Conflict Management" (with Paula Gutlove), *Helsinki Monitor*, Volume 6 (1995), Number 3.
- "Potential Characteristics of Severe Reactor Accidents at Nuclear Plants", "Monitoring and Modelling Atmospheric Dispersion of Radioactivity Following a Reactor Accident" (with Richard Sclove, Ulrike Fink and Peter Taylor), "Safety Status of Nuclear Reactors and Classification of Emergency Action Levels", and "The Use of Probabilistic Risk Assessment in Emergency Response Planning for Nuclear Power Plant Accidents" (with Robert Goble), in D. Golding, J. X. Kasperson and R. E. Kasperson (eds), *Preparing for Nuclear Power Plant Accidents*, Westview Press, Boulder, CO, 1995.
- *A Data Manager for the Global Environment Facility* (with Robert Goble), Environment Department, The World Bank, June 1994.
- *Preventive Diplomacy and National Security* (with Paula Gutlove), Winston Foundation for World Peace, Washington, DC, May 1994.
- *Opportunities for International Control of Weapons-Usable Fissile Material*, ENWE Paper #1, International Physicians for the Prevention of Nuclear War, Cambridge, MA, January 1994.
- "Article III and IAEA Safeguards", in F. Barnaby and P. Ingram (eds), *Strengthening the Non-Proliferation Regime*, Oxford Research Group, Oxford, UK, December 1993.
- *Risk Implications of Potential New Nuclear Plants in Ontario* (prepared with the help of eight consultants), a report for the Coalition of Environmental Groups, Toronto, submitted to the Ontario Environmental Assessment Board, November 1992 (3 volumes).
- *Strengthening the International Atomic Energy Agency*, Working Paper No. 6, IRSS, Cambridge, MA, September 1992.

*Curriculum Vitae for Gordon R. Thompson*  
July 2000

- *Design of an Information System on Technologies that can Limit Greenhouse Gas Emissions* (with Robert Goble and F. Scott Bush), Center for Strategic and International Studies, Washington, DC, May 1992.
- *Managing Nuclear Accidents: A Model Emergency Response Plan for Power Plants and Communities* (with six other authors), Westview Press, Boulder, CO, 1992.
- "Let's X-out the K" (with Steven C. Sholly), *Bulletin of the Atomic Scientists*, March 1992, pp 14-15.
- "A Worldwide Programme for Controlling Fissile Material", and "A Global Strategy for Nuclear Arms Control", in F. Barnaby (ed), *Plutonium and Security*, Macmillan Press, UK, 1992.
- *No Restart for K Reactor* (with Steven C. Sholly), Working Paper No. 4, IRSS, Cambridge, MA, October 1991.
- *Regulatory Response to the Potential for Reactor Accidents: The Example of Boiling-Water Reactors*, Working Paper No. 3, IRSS, Cambridge, MA, February 1991.
- *Peace by Piece: New Options for International Arms Control and Disarmament*, Working Paper No. 1, IRSS, Cambridge, MA, January 1991.
- *Developing Practical Measures to Prevent Climate Disruption* (with Robert Goble), CENTED Research Report No. 6, Clark University, Worcester, MA, August 1990.
- "Treaty a Useful Relic", *Bulletin of the Atomic Scientists*, July/August 1990, pp 32-33.
- "Practical Steps for the 1990s", in Sadruddin Aga Khan (ed), *Non-Proliferation in a Disarming World*, Proceedings of the Groupe de Bellerive's 6th International Colloquium, Bellerive Foundation, Geneva, Switzerland, 1990.
- *A Global Approach to Controlling Nuclear Weapons*, Occasional Paper published by the Institute for Resource and Security Studies, October 1989.
- *IAEA Safety Targets and Probabilistic Risk Assessment* (with three other authors), Greenpeace International, Amsterdam, August 1989.
- *New Directions for NATO* (with Paul Walker and Pam Solo), published jointly by IRSS and the Institute for Peace and International Security (both of Cambridge, MA), December 1988.
- "Verifying a Halt to the Nuclear Arms Race", in F. Barnaby (ed), *A Handbook of Verification Procedures*, Macmillan Press, UK, 1990.
- "Verification of a Cutoff in the Production of Fissile Material", in F. Barnaby (ed), *A Handbook of Verification Procedures*, Macmillan Press, UK, 1990.

*Curriculum Vitae for Gordon R. Thompson*  
July 2000

- "Severe Accident Potential of CANDU Reactors," Consultant's Report in *The Safety of Ontario's Nuclear Power Reactors*, Ontario Nuclear Safety Review, Toronto, February 1988.
- *Nuclear-Free Zones* (edited with David Pitt), Croom Helm Ltd, Beckenham, UK, 1987.
- *Risk Assessment Review For the Socioeconomic Impact Assessment of the Proposed High-Level Nuclear Waste Repository at Hanford Site, Washington* (edited; written with five other authors), prepared for the Washington Department of Ecology, December 1987.
- *The Nuclear Freeze Revisited* (written with Andrew Haines), Nuclear Freeze and Arms Control Research Project, Bristol, UK, November 1986. Variants of the same paper have appeared as Working Paper No. 18, Peace Research Centre, Australian National University, Canberra, February 1987, and in *ADIU Report*, University of Sussex, Brighton, UK, Jan/Feb 1987, pp 6-9.
- *International Nuclear Reactor Hazard Study* (with fifteen other authors), Greenpeace, Hamburg, Federal Republic of Germany (2 volumes), September 1986.
- "What happened at Reactor Four" (the Chernobyl reactor accident), *Bulletin of the Atomic Scientists*, August/September 1986, pp 26-31.
- *The Source Term Debate: A Report by the Union of Concerned Scientists* (with Steven C. Sholly), Union of Concerned Scientists, Cambridge, MA, January 1986.
- "Checks on the spread" (a review of three books on nuclear proliferation), *Nature*, 14 November 1985, pp 127-128.
- Editing of *Perspectives on Proliferation*, Volume I, August 1985, published by the Proliferation Reform Project, IRSS.
- "A Turning Point for the NPT ?", *ADIU Report*, University of Sussex, Brighton, UK, Nov/Dec 1984, pp 1-4.
- "Energy Economics", in J. Dennis (ed), *The Nuclear Almanac*, Addison-Wesley, Reading, MA, 1984.
- "The Genesis of Nuclear Power", in J. Tirman (ed), *The Militarization of High Technology*, Ballinger, Cambridge, MA, 1984.
- *A Second Chance: New Hampshire's Electricity Future as a Model for the Nation* (with Linzee Weld), Union of Concerned Scientists, Cambridge, MA, 1983.
- *Safety and Waste Management Implications of the Sizewell PWR* (prepared with the help of six consultants), a report to the Town & Country Planning Association, London, UK, 1983.
- *Utility-Scale Electrical Storage in the USA: The Prospects of Pumped Hydro, Compressed Air, and Batteries*, Princeton University report PU/CEES #120, 1981.

*Curriculum Vitae for Gordon R. Thompson*  
*July 2000*

- *The Prospects for Wind and Wave Power in North America*, Princeton University report PU/CEES # 117, 1981.
- *Hydroelectric Power in the USA: Evolving to Meet New Needs*, Princeton University report PU/CEES # 115, 1981.
- Editing and part authorship of "Potential Accidents & Their Effects", Chapter III of *Report of the Gorleben International Review*, published in German by the Government of Lower Saxony, FRG, 1979—Chapter III available in English from the Political Ecology Research Group, Oxford, UK.
- *A Study of the Consequences to the Public of a Severe Accident at a Commercial FBR located at Kalkar, West Germany*, Political Ecology Research Group report RR-1, 1978.

Expert presentations and testimony (selected)

- UK Consensus Conference on Radioactive Waste Management, 1999: provided invited testimony on information and decision-making.
- Joint Committee on Public Enterprise and Transport, Irish Parliament, 1999: provided invited testimony on nuclear fuel reprocessing and international security.
- UK and Irish Parliaments, 1998: gave members' briefings on risks and alternative options associated with nuclear fuel reprocessing in the UK.
- Center for Russian Environmental Policy, Moscow, 1996: presentation at a forum in parallel with the G-7 Nuclear Safety Summit.
- Lacey Township Zoning Board, New Jersey, 1995: testimony regarding radioactive waste management.
- Ontario Court of Justice, Toronto, Ontario, 1993: testimony regarding Canada's Nuclear Liability Act.
- Oxford Research Group, seminar on "The Plutonium Legacy", Rhodes House, Oxford, UK, 1993: presentation on nuclear safeguards.
- Defense Nuclear Facilities Safety Board, Washington, DC, 1991: testimony regarding the proposed restart of K-reactor, Savannah River Site.
- Conference to consider amending the Partial Test Ban Treaty, United Nations, New York, 1991: presentation on a global approach to arms control and disarmament.
- US Department of Energy, hearing on draft EIS for new production reactor capacity, Columbia, SC, 1991: presentation on tritium need and implications of tritium production options.
- Society for Risk Analysis, 1990 annual meeting, New Orleans, special session on nuclear emergency planning: presentation on real-time techniques for anticipating emergencies.

*Curriculum Vitae for Gordon R. Thompson*  
*July 2000*

- **Parliamentarians' Global Action, 11th Annual Parliamentary Forum, United Nations, Geneva, 1990: presentation on the potential for multilateral nuclear arms control.**
- **Advisory Committee on Nuclear Facility Safety, public meeting, Washington, DC, 1989: submission on public access to information and on government accountability.**
- **Peace Research Centre, Australian National University, seminar on "Australia and the Fourth NPT Review Conference", Canberra, 1989: proposal of a universal nuclear weapons non-proliferation regime.**
- **Carnegie Endowment for International Peace, Conference on "Nuclear Non-Proliferation and the Role of Private Organizations", Washington, DC, 1989: options for reform of the non-proliferation regime.**
- **US Department of Energy, EIS scoping hearing, Columbia, SC, 1988: appropriate scope of an EIS for new production reactor capacity.**
- **International Physicians for the Prevention of Nuclear War, 6th and 7th Annual Congresses, Koln, FRG, 1986 and Moscow, USSR, 1987: relationships between nuclear power and the threat of nuclear war.**
- **County Council, Richland County, SC, 1987: implications of severe reactor accidents at the Savannah River Plant.**
- **Maine Land Use Regulation Commission, 1985: cogeneration potential at facilities of Great Northern Paper Company.**
- **Interfaith Hearings on Nuclear Issues, Toronto, Ontario, 1984: options for Canada's nuclear trade and Canada's involvement in nuclear arms control.**
- **Sizewell Public Inquiry, UK, 1984: safety and radioactive waste implications of the proposed Sizewell nuclear plant.**
- **New Hampshire Public Utilities Commission, 1983: electricity demand and supply options for New Hampshire.**
- **Atomic Safety & Licensing Board, US Nuclear Regulatory Commission, 1983: use of filtered venting at the Indian Point nuclear plants.**
- **US National Advisory Committee on Oceans and Atmosphere, 1982: implications of ocean disposal of radioactive waste.**
- **Environmental & Energy Study Conference, US Congress, 1982: implications of radioactive waste management.**

Miscellaneous

- **Married, two children.**
- **Extensive experience in public speaking before professional and lay audiences, and in interviews with print and broadcast journalists.**
- **Author of numerous newspaper, newsletter, and magazine articles and book reviews.**

*Curriculum Vitae for Gordon R. Thompson*  
*July 2000*

Contact information

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

<b>In the Matter of</b>	)	
	)	
<b>CAROLINA POWER &amp; LIGHT</b>	)	<b>Docket No. 50-400 -OLA</b>
<b>(Shearon Harris Nuclear</b>	)	<b>ASLBP No. 99-762-02-LA</b>
<b>Power Plant)</b>	)	
	)	

**CERTIFICATE OF SERVICE**

I certify that on September 13, 2000, copies of Orange County's Response to Interrogatories Contained in Applicant's First Set of Environmental Discovery Requests were served on the service list below by e-mail and/or first class mail as indicated below:

Secretary of the Commission  
Attention: Rulemakings and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
E-mail: hearingdocket@nrc.gov

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Orange County Board of Commissioners  
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Adjudicatory File  
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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

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Diane Curran  
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