

RAS 2236

RELATED CORRESPONDENCE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

September 27, 2000
DOCKETED 9/28/00

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

The Nuclear Regulatory Commission staff (Staff) hereby files its third supplemental response to Orange County's First Set of Environmental Discovery Requests Directed to NRC Staff, filed August 21, 2000. By filing this Third Supplemental Response, the Staff does not waive any general or specific objections, rights or privileges, previously asserted in responding to BCOC's discovery requests.

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.

STAFF'S RESPONSE:

The Staff provides the following additional response:

Christopher Gratton

Area of professional expertise: Plant systems, including spent fuel storage systems and support systems. (System design and operation).

Prior testimony: deposition and affidavit, Carolina Power & Light Company (Shearon Harris Nuclear Power Plant), Docket No. 50-400-OLA, ASLBP No. 99-762-02-LA (Technical contentions).

Stephen LaVie

Area of professional expertise: Radiological accident consequence analysis; radiation dose assessment. (Radiation dose, habitability, access).

Prior testimony: None

Robert Palla

Area of professional expertise: Severe accident analysis, containment performance, offsite consequences and risk management. (Probabilistic risk assessment, performance of containment during severe accident.)

Prior testimony: None.

Gareth Parry

Area of professional expertise: Probabilistic risk assessment, severe accidents. (Probabilistic risk assessment; scenario frequencies).

Prior testimony: None.

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 27th 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 THIRD 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 27TH day of September, 2000:

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