

RAS 2423

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November 30, 2000

Emile Julian, Assistant
Rulemakings and Adjudications
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: Carolina Power & Light (Shearon Harris Nuclear Power Plant),
Docket No. 50-400LA, ASLB No. 99-762-02-LA

Dear Mr. Julian:

I am enclosing the original signed signature page for the Declaration of Dr. Gordon Thompson (November 20, 2000), which was filed with your office on November 20, 2000, as Exhibit 1 to Orange County's Detailed Summary of Facts, Data, and Arguments, Etc., in the above-captioned proceeding. Because of time and geographical constraints, we were not able to file the signed original on November 20.

Sincerely,



Diane Curran

cc: Service List

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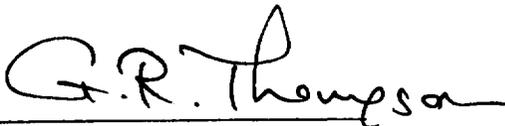
SECY-02

12. In the course of the Harris license amendment proceeding, I have gained a great deal of knowledge regarding the specific design features of the Harris plant, as well as its operation. Taken together with my general knowledge of nuclear power plant design and operation, this provides me with a more than adequate basis for applying principles of risk analysis to the Harris reactor. In addition, during the course of the Harris license amendment proceeding, I have updated and supplemented my already-strong knowledge regarding the characteristics of reactor accidents and spent fuel pool accidents, as well as the current body of knowledge regarding the application of PRA techniques to the problem at hand. It is important to observe in this context that in order to be able to review and comment on a PRA, or to perform PRA analysis, it is neither necessary nor possible to have a high level of expertise in every conceivable area of nuclear power plant design and operation. A PRA is an interdisciplinary study requiring an understanding of many different aspects of nuclear power plant design and operation. Typically, PRA's are conducted by teams of individuals who contribute knowledge and understanding from different areas of expertise. In order to review or contribute to a PRA, it is necessary to have broad general knowledge of nuclear power plant design and operation, a general understanding of the specific design and operational features of the plant that is being analyzed, and a strong familiarity with the methodology, strengths and weaknesses of PRA. I believe I have the requisite degree of knowledge and understanding in all of these areas.

13. Accordingly, I have considerable expertise regarding the technical issues that have been raised by the parties in this proceeding. I believe that my knowledge and skills will be of substantial use to the Licensing Board in weighing the evidence.

I declare, under penalty of perjury, that the foregoing facts provided in my Declaration are true and correct to the best of my knowledge and belief, and that the opinions expressed herein are based on my best professional judgment.

Executed on 20 November 2000.


Gordon Thompson