

RAS 1040

RELATED CORRESPONDENCE

DOCKETED
USNRC

'99 OCT 13 11:16

October 12, 1999
FBI
ADJUTANT GENERAL

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

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

The Nuclear Regulatory Commission staff (Staff) hereby files this supplement to Staff responses to Orange County's First Set of Discovery Requests to NRC Staff, filed September 20, 1999.

A. GENERAL INTERROGATORIES

GENERAL INTERROGATORY NO. 2. For each admitted Orange County contention, give the name, address, profession, employer, area of professional expertise, and educational and scientific experience of each person whom the NRC Staff expects to provide sworn affidavits and declarations in the written filing for the Subpart K proceeding described in the Board's July 29, 1999, 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.

The Staff supplements its response to Orange County's First Set of Discovery Requests by providing the following additional person who is likely to provide a sworn affidavit or declaration in the written filing for the subpart K proceeding:

Christopher Gratton
Reactor Systems Engineer
Plant Systems Branch, Division of Systems Safety & Analysis
Office of Nuclear Reactor Regulation
General subject matter: Contention 3

A resume is annexed hereto. The Staff reserves the right to amend this answer as discovery continues.

GENERAL INTERROGATORY NO. 3. For each admitted Orange County contention, identify each expert on whom the NRC Staff intends to rely on in its written filing for the Subpart K proceeding described in the Board's July 29, 1999 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 the NRC Staff 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 expert has testified as an expert at a trial, hearing or by deposition within the preceding four years.

The Staff supplements its response to Orange County's First Set of Discovery Requests by providing the following name:

Christopher Gratton
Publications within 10 years: none
Testimony within 4 years: none

The Staff reserves the right to amend this answer as discovery continues.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "S. Uttal".

Susan L. Uttal
Counsel for NRC staff

Dated at Rockville, Maryland
this 12th day of October 1999

Christopher Gratton
Reactor Systems Engineer

Education

M.B.A. University of Maryland, 1992
B.S., Engineering, University of Maryland, 1980

Employment

U.S. Nuclear Regulatory Commission, Reactor Systems Engineer, 1992 - present
Performs safety evaluations of reactor license applications, technical specifications, and topical reports for various balance-of-plant systems including wet spent fuel storage facilities. Performed risk assessments and safety evaluations regarding the adequacy of spent fuel storage issues as part of the Spent Fuel Storage Pool Action Plan.

U.S. Nuclear Regulatory Commission, Operator Licensing Examiner, 1987 - 1992
Qualified operator licensing examiner for boiling water, test and research reactors. Developed and administered licensing examinations to candidates applying for certification. Examinations included written, oral, and performance based tests administered on plan simulators. Topics included physics, reactor system and auxiliary system design and operation, emergency operating and offsite accident response procedures.

Norfolk Naval Shipyard, Assistant Chief Test Engineer, 1980 - 1987
Responsible for the overall safety of the nuclear power plant aboard submarines undergoing overhaul. Qualified Shift Test Engineer (STE) for reactors designed by Westinghouse and General Electric. Responsible for setting electrical and mechanical isolations, changing plant conditions to support maintenance and testing, and directing post-maintenance tests.

DOCKETED
USNRC

'99 OCT 13 A11:16

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF THE
SECRETARY
ADJUDICATIONS

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 FIRST SUPPLEMENTAL RESPONSE TO ORANGE COUNTY'S FIRST SET OF DISCOVERY REQUESTS TO NRC STAFF" in the above captioned proceeding have been served on the following through deposit in the Nuclear Regulatory Commission's internal mail system or as indicated by an asterisk, by first-class mail and by electronic mail (e-Mail) transmission where indicated this 12th day of October, 1999:

G. Paul Bollwerk, III, Chairman
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T 3F-23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
(E-mail: GPB@NRC.GOV)

Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T-3F-23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
(E-mail: FJS@NRC.GOV)

Dr. Peter S. Lam
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop: T 3F-23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
(E-mail: PSL@NRC.GOV)

Office of the Secretary
ATTN: Rulemaking and Adjudications
Staff
Mail Stop: O 16-C-1
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001
(E-mail: HEARINGDOCKET@NRC.GOV)

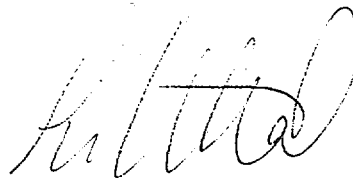
Office of the Commission Appellate
Adjudication
Mail Stop: O 16-C-1
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Diane Curran, Esq.*
Harmon, Curran, Spielberg
& Eisenberg, L.L.P.
1726 M Street, N.W., Suite 600
Washington, DC 20025
(E-mail: dcurran@harmoncurran.com)

Steven Carr*
Legal Department
Carolina Power & Light Co.
411 Fayetteville Street Mall
P.O. Box 1551- CPB 13A2
Raleigh, North Carolina 27602
(E-mail: steven.carr@cplc.com)

James M. Cutchin, V
Atomic Safety and Licensing Board
Mail Stop: T 3F-23
U.S. Nuclear Regulatory Commission
Washington, DC 20555
(E-mail: JMC3@NRC.GOV)

John H. O'Neill, Jr.*
William R. Hollaway*
Counsel for Licensee
Shaw Pittman Potts & Trowbridge
2300 "N" Street, N.W.
Washington, DC 20037-1128
(E-mail: john_o'neill@shawpittman.com,
william.hollaway@shawpittman.com)



Susan L. Uttal
Counsel for NRC Staff