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

OFFICE OF THE SECRETARY  
REGULATORY AFFAIRS  
ADJUDICATIVE DIVISION

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 SUPPLEMENTAL  
RESPONSE TO APPLICANT'S FIRST SET OF INTERROGATORIES**

As per its agreement with the Applicant, Orange County hereby provides a supplemental response to the interrogatory answers it filed on August 30, in response to Applicant's First Set of Discovery Requests Directed to the Board of Commissioners of Orange County (August 16, 1999). This response contains information relevant to the testimony and expertise of David A. Lochbaum.

**II. GENERAL INTERROGATORIES**

**GENERAL INTERROGATORY NO. 2.** For each admitted BCOC contention, 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 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.

**ORANGE COUNTY'S RESPONSE:** Orange County expects to provide an affidavit or declaration from Mr. Lochbaum regarding Contentions TC-2 and TC-3. His

area of professional expertise is nuclear safety engineering. A copy of Mr. Lochbaum's resume is attached.

**GENERAL INTERROGATORY NO. 3.** For each admitted BCOC contention, identify each expert on whom BCOC 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 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 expert has testified as an expert at a trial, hearing or by deposition within the preceding four years.

**ORANGE COUNTY'S RESPONSE:** Orange County expects that it will rely on Mr. Lochbaum for its written presentation in the Subpart K proceeding regarding contentions TC-2 and TC-3. Mr. Lochbaum will provide a sworn affidavit or declaration regarding the adequacy of the Applicant's compliance with the relevant regulatory requirements and the safety significance of any noncompliance.

The following is a list of Mr. Lochbaum's major publications within the last ten years:

1. *Nuclear Waste Disposal Crisis*, (PennWell Books, Tulsa, OK, January 1996).
2. "Nuclear Plant Safety in a Changing Energy Market," article published in UCS's *Nucleus* magazine (Spring 1997).
3. "The Good, The Bad, and the Ugly: A Report on Safety in America's Nuclear Power Industry" (UCS, June 1998).
4. "The Good, The Bad, and the Ugly," article published in UCS' *Nucleus* magazine (Fall 1998).
5. "Nuclear Power Plants – How Long Before Our Luck Runs Out?," article published in *The Washington Spectator* (February 1, 1999).

Within the preceding four years, Mr. Lochbaum provided testimony in the following proceedings:

1. Kiick and Edward Kiick v. Metropolitan Edison Co. et al, Civil Action No. 1:CV-88-1452, United States District Court for the Middle of Pennsylvania.
2. Yankee Rowe nuclear power plant, intervention by Citizens Awareness Network in NRC proceeding for approval of License Termination Plan (Docket No. 50-029-LA, ASLBP No. 98-736-01-LA).
4. Seabrook nuclear power plant, intervention by Seacoast Anti-Pollution League in NRC license amendment proceeding regarding one-time exception to steam generator inspections (Docket No. 50-443-LA).

Respectfully submitted,



Diane Curran  
Harmon, Curran, Spielberg, & Eisenberg, LLP  
1726 M Street N.W., Suite 600  
Washington, D.C. 20036  
202/328-3500

September 3, 1999

## David A. Lochbaum

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### Experience Summary

10/96 to date *Nuclear Safety Engineer, Union of Concerned Scientists*

Responsible for directing UCS's nuclear safety program, for monitoring developments in the nuclear industry, for serving as the organization's spokesperson on nuclear safety issues, and for initiating action to correct safety concerns.

11/87 to 09/96 *Senior Consultant, Enercon Services, Inc.*

Responsible for developing the conceptual design package for the alternate decay heat removal system, for closing out partially implemented modifications, reducing the backlog of engineering items, and providing training on design and licensing bases issues at the Perry Nuclear Power Plant.

Responsible for developing a topical report on the station blackout licensing bases for the Connecticut Yankee plant.

Responsible for vertical slice assessment of the spent fuel pit cooling system and for confirmation of licensing commitment implementation at the Salem Generating Station.

Responsible for developing the primary containment isolation devices design basis document, reviewing the emergency diesel generators design basis document, resolving design document open items, and updating design basis documents for the James A. FitzPatrick Nuclear Power Plant.

Responsible for the design review of balance of plant systems and generating engineering calculations to support the Power Uprate Program for the Susquehanna Steam Electric Station.

Responsible for developing the reactor engineer training program, revising reactor engineering technical and surveillance procedures and providing power maneuvering recommendations at the Hope Creek Generating Station.

Responsible for supporting the lead BWR/6 Technical Specification Improvement Program and preparing licensing submittals for the Grand Gulf Nuclear Station.

03/87 to 08/87 *System Engineer, General Technical Services*

Responsible for reviewing the design of the condensate, feedwater and raw service systems for safe shutdown and restart capabilities for the Browns Ferry Nuclear Plant.

08/83 to 02/87 *Senior Engineer, Enercon Services, Inc.*

Responsible for performing startup and surveillance testing, developing core monitoring software, developing the reactor engineer training program, and supervising the reactor engineers and Shift Technical Advisors at the Grand Gulf Nuclear Station.

## David A. Lochbaum

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### Experience Summary (continued)

10/81 to 08/83 *Reactor Engineer / Shift Technical Advisor, Tennessee Valley Authority*

Responsible for performing core management functions, administering the nuclear engineer training program, maintaining ASME Section XI program for the core spray and CRD systems, and covering STA shifts at the Browns Ferry Nuclear Plant.

06/81 to 10/81 *BWR Instructor, General Electric Company*

Responsible for developing administrative procedures for the Independent Safety Engineering Group (ISEG) at the Grand Gulf Nuclear Station.

01/80 to 06/81 *Reactor Engineer / Shift Technical Advisor, Tennessee Valley Authority*

Responsible for directing refueling floor activities, performing core management functions, maintaining ASME Section XI program for the RHR system, providing power maneuvering recommendations and covering STA shifts at the Browns Ferry Nuclear Plant.

06/79 to 12/79 *Junior Engineer, Georgia Power Company*

Responsible for completing pre-operational testing of the radwaste solidification systems and developing design change packages for modifications to the liquid radwaste systems at the Edwin I. Hatch Nuclear Plant.

### Education

June 1979 Bachelor of Science in Nuclear Engineering, The University of Tennessee at Knoxville  
May 1980 Certification, Interim Shift Technical Advisor, TVA Browns Ferry Nuclear Plant  
April 1982 Certification, Shift Technical Advisor, TVA Browns Ferry Nuclear Plant

### Professional Affiliations

Member, American Nuclear Society (since 1978).

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NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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Power Plant) )

Docket No. 50-400 -OLA  
ASLBP No. 99-762-02-LA

OFFICE OF THE  
GENERAL COUNSEL  
RULEMAKING AND  
ADJUDICATION

**CERTIFICATE OF SERVICE**

I certify that on September 3, 1999, copies of the foregoing ORANGE COUNTY'S SUPPLEMENTAL RESPONSE TO APPLICANT'S FIRST SET OF INTERROGATORIES were served on the following by e-mail and/or first class mail as indicated below:

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Diane Curran