

RESPONSE: With respect to Contention 3, GANE's supplemental interrogatory answers were prepared by:

Dr. Leland Timothy Long, Professor of Geophysics
School of Earth and Atmospheric Sciences
Georgia Institute of Technology
311 Ferst Avenue
Atlanta, Georgia 30332-0340.

Please note that this address is different from the address previously provided for Dr. Long.

GENERAL INTERROGATORY NO. 2 For each Admitted Contention, give the name, business address, profession, employer, area of professional expertise, education, relevant experience, and qualifications of each person whom you expect to call as a witness at the Hearing to the extent such information has not been provided in response to the Atomic Safety and Licensing Board's April 30, 2002 Memorandum and Order. For purposes of answering this interrogatory, the education and experience of the expected witnesses may be provided by attaching to the response a resume of each person. In addition, provide a list of all publications authored by the expected witness within the preceding ten years, and a list of any other cases in which the person has given testimony, at any time, as an expert at a trial, hearing, or deposition.

RESPONSE: As discussed in its initial response to this request, GANE expects to call Dr. Edwin S. Lyman as its expert witness regarding GANE Contentions 1 and 2; GANE Contentions 5 and 8 and BREDL Contention 9; and GANE Contention 6. A copy of Dr. Lyman's curriculum vita is attached. Dr. Lyman has testified in the following cases:

1. *Hirt v. Richardson*, No. 1:99-CV-933 (U.S. District Court, Western District of Michigan, Southern Division) (gave expert testimony).
2. *Mayguezanos Por la Salud y el Ambiente v. United States of America*, No. 98-1087 (SEC) (submitted declaration).

II. SPECIFIC INTERROGATORIES

GANE Contention 3 (Seismic)

INTERROGATORY 3.6: Does GANE agree that the RG 1.60 5% damping spectrum scaled up to 0.2g peak ground acceleration has a return interval of 10,000 years at frequencies of practical structural interest for the MOX Facility (*i.e.*, at frequencies that could affect the structural integrity of the structures of the MOX Facility)? If not, explain the regulatory, scientific, technical, legal, and any other bases for your disagreement.

RESPONSE: No. The return interval used by DCS is based on the Lawrence Livermore National Laboratory (“LLNL”) and Electric Power Research Institute (“EPRI”) studies. These studies did not appropriately model the attenuation of earthquake amplitude over a distance of approximately 110 kilometers (*i.e.*, the distance over which the peak amplitude was observed), because they assumed uniform decay of amplitude over that distance. More recent studies like those discussed in Stephenson, 1991, show anomalous and high amplitudes at distances of approximately 110 km from the epicenter. (Stephenson, E. E. Geomatrix Final Report on “Ground motion following Selection of SRS Design Basis Earthquake and Associated Deterministic Approaches,” pg. 36, figure 53-55.) The dominant component of the earthquake hazard at the MOX Facility site comes from a repeat of the Charleston event at approximately the same distance (80-150 km). Therefore, attenuation curves should be corrected to reflect increased amplitude at the MOX Facility site. This would correspondingly increase the hazard and reduce the return period.

INTERROGATORY 3.29: Does GANE agree with DCS’ response to the February 28, 2001 CAR RAI referenced in GANE’s Basis Statement for this contention? If not, identify the specific CAR RAI Response referenced by GANE and fully explain each respect in which GANE claims that DCS’ CAR RAI Response is inadequate or incorrect.

RESPONSE: The response covers 31 items or questions for clarification, and not all are appropriate for comment. Questions 1-8 have to do with personnel, operations, administration, decommissioning, and land use, which are not a subject of Contention 3. Questions 9-11 have to do with weather and airborne missiles, which are not subjects of Contention 3. Questions 23 and 24 relate to slope stability and the location of a spoil pile, which are not subjects of Contention 3. Questions 25-28 relate to liquefaction, an issue GANE is not pursuing. Question 29 asks for references, which DCS appears to have done. Questions 30-32 appear to relate to finances and administration, which are not subjects of the contention.

The following items are appropriate for comment:

Item 12a. No. Item 12a asks for the inputs to the PSHA, such as the logic tree. We would interpret this to require identification of attenuation functions; and for each function identified, a statement of the relative probability of the attenuation function as used in the LLNL and EPRI studies. Instead of providing this information, DCS identified the summary reports of the LLNL and EPRI studies as references. As discussed above and in previous discovery responses, we consider the LLNL and EPRI studies to be inappropriate and outdated for purposes of conducting site-specific PSHA.

Item 12 b,c,d. Yes, the questions are adequately answered.

Items 13 –15. These questions and answers relate to the soil response under the site, an issue that GANE has decided not to pursue.

Item 16. Yes, references are provided as requested.

Item 17. Yes, DCS has shown that the spectra they computed are bracketed by the UHS for frequencies above 1.0 Hz.

Item 18. Yes, this question concerns the proper spectra to use for the vertical motion. The response to this question demonstrated that the vertical motions in the eastern United States can be greater than usually assumed for the western United States. DCS, accordingly, has adopted a higher amplitude for the vertical spectrum.

Item 19. Yes, DCS has provided requested details and they are appropriate.

Item 20-22. Yes, these are technical details for which appropriate answers were given.

INTERROGATORY NO. 3.30: Identify and fully explain why GANE claims that “the approach to the PSHA has been insufficiently conservative.”

RESPONSE: GANE generally agrees that the approach taken by DCS in computing the PSHA is appropriate, with the exception discussed in response to Interrogatory 3.6 above. In addition, DCS did not use appropriate considerations of the size and shape of the Charleston Earthquake epicentral zone. It is well known that a narrow concentrated source zone places more risk at the epicenter, whereas a larger regional zone gives higher hazard values at points more distant from the epicentral zone. In this case, spreading the epicenters for the Coastal Plain over a larger area would give a higher hazard at SRP than a single small Charleston epicentral zone.

Note: Lee, R.C., 1998, Computation of USGS Soil UHS and Comparison to NEHRP and PC1 Seismic Response Spectra for the SRS. WSRC-R-99-00271, Rev. 0., in “Soil Surface Seismic Hazard and Design Basis Guidelines for Performance Category 1&2 SRS Facilities,” goes to some effort to claim that the NEHERP97 results are not appropriate, and too high. GANE agrees with Lee’s recommendation that “Additional work will be required to better clarify and understand the difference between EPRI, LLNL, and USGS hazard assessments including site response.”

INTERROGATORY NO. 3.40: Contention 3 states that the CAR cites a number of Westinghouse Savannah River Company (“WSRC”) technical reports that are not available, and therefore “it is not possible to verify the assertions made in the CAR regarding the MFFF site geology.” Subsequent to the filing of Contention 3, DCS docketed with the NRC references to WSRC technical reports. Has GANE reviewed these WSRC reports that have been docketed with the NRC? If yes, does GANE agree that these reports verify the assertions made in the CAR regarding the MFFF site geology and seismicity? If not, identify each assertion in the CAR that GANE contends is not verified by the WSRC reports, and provide the basis for your answer.

RESPONSE: Including the WSRC document identified in response to Interrogatory 3.30, Dr. Long has reviewed the following WSRC documents:

1. Lee, R.C., 1998. Computation of USGS Soil UHS, a Comparison to NEHRP and PC1 Seismic Response Spectra for the SRS WSRC-TR-99-00271 in Soil Surface Seismic Hazard and Design Basis Guidelines for Performance Category 1&2 SRS Facilities. The analysis in this study appears to be generally correct. However, it remains unclear why the NEHERP97 results are significantly higher than the LLNL and EPRI results and were considered not appropriate.

2. Geomatrix Consultants, Inc, 1991, Ground Motion Following Selection of SRS Design Basis Earthquake and Associated Deterministic Approach. In general, the geologic and seismic descriptions in this report appear to be correct. We take note that this study recognizes the existence of anomalous amplitudes at 110 km.

3. WSRC, 2001a Development of MFFF-Specific Vertical-to-Horizontal Seismic Spectral Ratios, by R.C. Lee, WSRC-TR-2001-00342. The descriptions and analyses in this report demonstrate the potential for higher vertical motions, particularly for close and large events and for higher frequencies at this eastern United States site.

For the objections,



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March 5, 2003

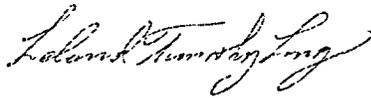
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
Thomas S. Moore, Chairman
Charles N. Kelber
Peter S. Lam

_____)	
In the Matter of)	
DUKE COGEMA STONE & WEBSTER)	Docket No. 0-70-03098-ML
(Savannah River Mixed Oxide Fuel)	ASLBP No. 01-790-01-ML
Fabrication Facility))	
_____)	

**DECLARATION OF DR. LELAND TIMOTHY LONG
IN SUPPORT OF INTERVENORS' DISCOVERY RESPONSES**

Under penalty of perjury, I, Leland Timothy Long, declare that I am responsible for the factual information and professional opinions stated in response to interrogatories regarding Contention 3 (Seismic Design) in Georgians Against Nuclear Energy's Third Supplemental Response to Applicant's First Set of Interrogatories (March 5, 2003). The factual information in these interrogatory responses is true and correct to the best of my knowledge, and the opinions expressed therein are based on my best professional judgment.



Leland Timothy Long

Date: March 5, 2003

Edwin Stuart Lyman
Curriculum Vitæ

Born 21 June 1964, New York, NY; Citizenship: USA; Marital status: single.

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Education

Ph.D, Cornell University, Theoretical Physics, August 1992.
M.S., Cornell University, Physics, January 1990.
A.B., *summa cum laude*, New York University, Physics, June 1986; Phi Beta Kappa.

Professional Experience

June 2002-Present: President, Nuclear Control Institute, Washington, D.C.

July 1995-May 2002: Scientific Director, Nuclear Control Institute, Washington, D.C.

August 1992—June 1995: Postdoctoral research associate, Center for Energy and Environmental Studies, Princeton University, Princeton, NJ.

Spring 1995: Preceptor for Environmental Studies 302, "Perspectives on Environmental Issues: Values and Policies."

Spring 1994: Lecturer, Woodrow Wilson School. Preceptor for WWS 304, "Science, Technology and Public Policy."

July 1988—June 1992: Graduate research assistant, Newman Laboratory of Nuclear Studies, Cornell University, Ithaca, NY. Conducted thesis research on high-energy physics under the supervision of Prof. S.H.-H. Tye.

August 1986- June 1988: Andrew D. White Graduate Fellow, Physics, Cornell University.

Publications

E. Lyman, "Revisiting Nuclear Power Plant Safety" (letter), *Science* **299** (2003), 202.

E. Lyman, "The Limits of Technical Fixes," in *Nuclear Power and The Spread of Nuclear Weapons: Can We Have One Without the Other?* (P. Leventhal, S. Tanzer and S. Dolley, eds.), Brassey's, Washington, DC, 2002, 167-182.

E. Lyman, "The Pebble-Bed Modular Reactor: Safety Issues," *Physics and Society*, American Physical Society, October 2001.

E. Lyman, "Public Health Risks of Substituting Mixed-Oxide for Uranium Fuel in Pressurized Water Reactors," *Science and Global Security* **9** (2001), 1.

E. Lyman and S. Dolley, "Accident Prone," *Bulletin of the Atomic Scientists*, March/April 2000, 42.

E. Lyman and H. Feiveson, "The Proliferation Risks of Plutonium Mines," *Science and Global Security* **7** (1998), 119.

E. Lyman and P. Leventhal, "Bury the Stuff [Weapons Plutonium]," *Bulletin of the Atomic Scientists*, March/April 1997, 45.

E. Lyman, "Weapons Plutonium: Just Can It," *Bulletin of the Atomic Scientists*, November/December 1996, 48.

F. von Hippel and E. Lyman, "Appendix: Probabilities of Different Yields," addendum to J. Mark, "Explosive Properties of Reactor-Grade Plutonium," *Science and Global Security* **4** (1993), 125.

F. Berkhout, A. Diakov, H. Feiveson, H. Hunt, E. Lyman, M. Miller, and F. von Hippel, "Disposition of Separated Plutonium," *Science and Global Security* **3** (1993), 161.

E. Lyman, F. Berkhout and H. Feiveson, "Disposing of Weapons-Grade Plutonium," *Science* **261** (1993) 813.

P. Argyres, E. Lyman and S.H.-H. Tye, "Low-Lying States of the Six-Dimensional Fractional Superstring," *Phys. Rev.* **D46** (1992) 4533.

S.-w. Chung, E. Lyman and S.H.-H. Tye, "Fractional Supersymmetry and Minimal Coset Models in Conformal Field Theory," *Int. J. Mod. Phys* **A7** (1992) 3337.

Articles to be Published, Submitted for Publication or In Preparation

R. Alvarez, J. Beyea, K. Janberg, J. Kang, E. Lyman, A. Macfarlane, G. Thompson and F. von Hippel, "Reducing the Hazards from Stored Spent Power-Reactor Fuel in the United States," to appear in *Science and Global Security*.

G. Bunn, C. Braun, A. Glaser, E. Lyman and F. Steinhausler, "Research Reactor Vulnerability to Terrorists," December 2002, submitted to *Science and Global Security*.

D. Hirsch, D. Lochbaum and E. Lyman, in preparation, to appear in *Bulletin of the Atomic Scientists*.

T. Taylor, E. Lyman, S. Erickson and J. Regester, "Criticality Weapons: A Fifth Class of WMD," in preparation.

Selected Reports

E. Lyman, "Safety Issues in the Sea Shipment of Vitrified High-Level Radioactive Wastes to Japan," report sponsored by the Nuclear Control Institute, Greenpeace International and Citizens' Nuclear Information Center Tokyo, December 1994.

E. Lyman, "Interim Storage Matrices for Excess Plutonium: Approaching the 'Spent Fuel Standard' Without the Use of Reactors," PU/CEES Report No. 286, Center for Energy and Environmental Studies, Princeton University, August 1994.

E. Lyman, "The Solubility of Plutonium in Glass," PU/CEES Report No. 275, Center for Energy and Environmental Studies, Princeton University, April 1993.

Selected Invited Talks

"U.S. Nonproliferation Policy, Plutonium Disposition and the Threat of Nuclear Terrorism," seminar on "Recycling Plutonium: Risks and Alternatives," sponsored by the Green Group, European Parliament, Brussels, Belgium, January 9, 2003.

"Current Status of the U.S. Plutonium Disposition Program," seminar, Princeton University Program on Science and Global Security, Princeton University, Princeton, NJ, June 12, 2002.

"Controlling Fissile and Radioactive Material," Public Health Summit on Weapons of Mass Destruction, sponsored by Physicians for Social Responsibility and the UCLA School of Public Health, Ackerman Hall, UCLA, Los Angeles, June 2, 2002.

"Assessing the U.S. Government Response to the Nuclear Terrorism Threat After 9/11," presentation to the Joint Atomic Energy Intelligence Committee, McLean, VA, May 9, 2002.

"Upgrading Physical Protection at Nuclear Facilities to Address New Threats," MIT Security Studies Seminar, MIT, Boston, MA, April 18, 2002.

"Perspectives on New Plant Licensing," presentation at the U.S. Nuclear Regulatory Commission Briefing on Readiness for New Plant Applications and Construction, Washington, DC, July 19, 2001.

"Regulatory Challenges for Future Nuclear Plant Licensing: A Public Interest Perspective," U.S. NRC Advisory Committee on Reactor Safeguards (ACRS) Workshop on New Nuclear Plant Licensing, Washington, DC, June 5, 2001.

"The Future of Nuclear Power: A Public Interest Perspective," 2001 Symposium of the Northeast Chapter of Public Utility Commissioners, Mystic, CT, May 21, 2001.

Statement at the U.S. Nuclear Regulatory Commission Briefing on Office of Nuclear Regulatory Research Programs and Performance, May 11, 2001.

"Barriers to Deployment of Micro-Nuclear Technology," presentation at the workshop on "New Energy Technologies: A Policy for Micro-Nuclear Technologies," James A. Baker III Institute for Public Policy, Rice University, Houston, TX, March 19-20, 2001.

"Aging Research and Public Confidence," presentation at the U.S. Nuclear Regulatory Commission 2001 Regulatory Information Conference (RIC), Washington, DC, March 14, 2001.

"NRC Reactor Safeguards Activities," presentation at the U.S. Nuclear Regulatory Commission 2001 Regulatory Information Conference (RIC), Washington, DC, March 14, 2001.

"DOE's Nuclear Material Stabilization Approach: The Failure of Transparency," Embedded Topical Meeting on DOE Spent Nuclear Fuel and Fissile Material Management, American Nuclear Society Annual Meeting, San Diego, CA, June 2000.

"The Status of Reactor Safeguards Initiatives," presentation at the U.S. NRC 2000 Regulatory Information Conference, Washington, DC, March 29, 2000.

"Safety Questions Concerning MOX Fuel Use in Proposed U.S. Reactors," Sixth International Policy Forum on the Management and Disposition of Nuclear Weapons Materials, sponsored by Exchange/Monitor Publications, Washington, DC, June 1999.

"Transparency and Plutonium Disposition," ISIS Workshop on Comprehensive Controls on Plutonium and Highly Enriched Uranium: Long-Term Problems and Prospects for

Solutions, sponsored by the Institute for Science and International Security, Washington, DC, June 1997.

"Ship Transportation of Radioactive Materials," presentation to the Marine Board of the National Research Council, U.S. National Academy of Sciences, Woods Hole, MA, June 20, 1996.

"The Importation and Storage of High-Level Radioactive Wastes at Rokkasho-Mura: Safety Concerns," presentation at the Public Forum on High-Level Nuclear Waste and Reprocessing," Aomori, Japan, April 16, 1996.

"Perspectives on U.S. Options for Disposition of Excess Plutonium," Third International Policy Forum on the Management and Disposition of Nuclear Weapons Materials, sponsored by Exchange/Monitor Publications, Landsdowne, VA, March 21, 1996.

"Addressing Safety Issues in the Sea Transport of Radioactive Materials," presentation to the Special Consultative Meeting of Entities Involved in the Marine Transport of Nuclear Materials Covered by the INF Code," International Maritime Organization, London, March 4-6, 1996.

"Prospects and Unsolved Issues for Plutonium Immobilization," INESAP/IANUS/UNIDIR Fissile Cutoff Workshop, Palais des Nations, Geneva, June 1995.

"An Intermediate Solution for Plutonium from Dismantled Nuclear Warheads," Annual Meeting of the German Physical Society, Berlin, Germany, March 1995.

"The Sea Transport of High-Level Radioactive Waste: Environmental and Health Concerns," Channel Islands International Conference on Nuclear Waste, St. Helier, Jersey, United Kingdom, January 1995.

Conference Papers

E. Lyman and A. Kuperman, "A Reevaluation of Physical Protection Standards for Irradiated HEU Fuel," 24th International Meeting on Reduced Enrichment for Research and Test Reactors, RERTR-2002, Bariloche, Argentina, November 2002.

E. Lyman, "Material Protection, Control and Accounting at the U.S. MOX Fuel Fabrication Plant: Merely and Afterthought?" 43rd Annual Meeting of the Institute of Nuclear Materials Management (INMM), Orlando, FL, June 2002.

E. Lyman, "Terrorism Threat and Nuclear Power: Recent Developments and Lessons to be Learned," Symposium on Rethinking Nuclear Energy and Democracy after 9/11, sponsored by PSR/IPPNW Switzerland, Basel, Switzerland, April 2002.

E. Lyman, remarks for Expert Panel on Advanced Reactors, Nuclear Safety Research Conference, U.S. Nuclear Regulatory Commission, Washington, DC, October 2001.

E. Lyman, "The Future of Immobilization Under the U.S.-Russian Plutonium Disposition Agreement," 42nd Annual Meeting of the Institute of Nuclear Materials Management (INMM), Indian Wells, CA, July 18, 2001.

E. Lyman, comments in *the Report of the Expert Panel on the Role and Direction of Nuclear Regulatory Research*, U.S. Nuclear Regulatory Commission, May 2001.

E. Lyman, "Can the Proliferation Risks of Nuclear Power be Made Acceptable?" Nuclear Control Institute 20th Anniversary Conference, Washington, DC, April 9, 2001.

E. Lyman and P. Leventhal, "Radiological Sabotage at Nuclear Power Plants: A Moving Target Set," 41st Annual Meeting of the INMM, New Orleans, LA, July 2000.

E. Lyman, "Comments on the Storage Criteria for the Storage and Disposal of Immobilized Plutonium," Proceedings of the Institute for Science and International Security Conference on "Civil Separated Plutonium Stocks --- Planning for the Future," March 14-15, 2000, Washington, DC, Isis Press, 135.

E. Lyman, "The Sea Shipment of Radioactive Materials: Safety and Environmental Concerns," Conference on Ultrahazardous Radioactive Cargo by Sea: Implications and Responses, sponsored by the Maritime Institute of Malaysia, Kuala Lumpur, Malaysia, October 1999.

E. Lyman, "A Critique of Physical Protection Standards for Irradiated Materials," 40th Annual Meeting of the INMM, Phoenix, AZ, July 1999.

E. Lyman, "DOE Reprocessing Policy and the Irreversibility of Plutonium Disposition," Proceedings of the 3rd Topical Meeting on DOE Spent Nuclear Fuel and Fissile Materials Management, American Nuclear Society, Charleston, SC, September 8-11, 1998, 149.

E. Lyman, "Japan's Plutonium Fuel Production Facility (PFPP): A Case Study of the Challenges of Nuclear Materials Management," 39th Annual Meeting of the INMM, Naples, FL, July 1998.

E. Lyman, "Safety Aspects of Unirradiated MOX Fuel Transport," Annex 2b of the *Comprehensive Social Impact Assessment of MOX Use in Light Water Reactors*, Citizens' Nuclear Information Center, Tokyo, November 1997.

E. Lyman, "Unresolved Safety Issues in the Storage and Transport of Vitrified High-Level Nuclear Waste," 38th Annual Meeting of the INMM, Phoenix, AZ, July 1997.

E. Lyman, "A Perspective on the Proliferation Risks of Plutonium Mines," proceedings of

the Plutonium Stabilization and Immobilization Workshop, U.S. Department of Energy, Washington, DC, December 12-14, 1995, CONF-951259, p, 445.

E. Lyman, "Assessing the Proliferation and Environmental Risks of Partitioning-Transmutation," Fifth International Summer Symposium on Science and World Affairs, Cambridge, MA, USA, July 1993.

Op-Eds and Letters to the Editor

E. Lyman, "Troubles at Indian Point," New York Times, January 25, 2003.

E. Lyman and P. Leventhal, "Nonessential Nukes" (op-ed), Washington Post, November 26, 2002.

P. Leventhal and E. Lyman, "Shipping Plutonium," New York Times, July 12, 2002.

E. Lyman, "Indian Point Reactor," New York Times, January 27, 2002.

E. Lyman, "Spent Nuclear Fuel," New York Times, June 3, 2001.

E. Lyman and P. Leventhal, "Better Plutonium Plan," New York Times, February 5, 1998.

E. Lyman, "A Safer Plutonium Plan," Washington Post, August 24, 1997.

P. Leventhal and E. Lyman, "Who Says Iraq Isn't Making a Bomb?" International Herald Tribune, November 2, 1995.

H. Feiveson and E. Lyman, "No Solution to the Plutonium Problem," Washington Post, July 29, 1994.

E. Lyman, "Getting Rid of Weapon Plutonium," *Bulletin of the Atomic Scientists*, July/August 1994.

CERTIFICATE OF SERVICE

I hereby certify that on March 5, 2003, copies of the foregoing Georgians Against Nuclear Energy's Third Supplemental Response to Applicant's First Set of Interrogatories were served on the following by e-mail and/or first-class mail:

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