

RAS 6556

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June 18, 2002

Administrative Judge Thomas S. Moore, Chairman  
Administrative Judge Charles N. Kelber  
Administrative Judge Peter S. Lam  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

DOCKETED  
USNRC

June 24, 2003 (4:19PM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Re: *GANE's Motion for Protective Order*


Dear Administrative Judges,

The purpose of this letter is to respond to two questions raised by Duke Cogema Stone & Webster ("DCS") in the response that it filed today to Georgians Against Nuclear Energy's ("GANE's") Motion for Protective Order and Request to Quash Deposition.

The first question is: what is the rate charged by GANE's expert, Dr. Long, for his deposition? Pursuant to our agreement with Dr. Long for his professional services, he is charging GANE \$100/hour for consulting time (*i.e.*, time spent evaluating documents, responding to interrogatories, and consulting with counsel); and \$200/hour for testimony in depositions and hearings. Thus, we anticipate that he will charge \$100/hour for time spent preparing for his deposition and his travel time, and \$200/hour for time spent in the deposition itself. Dr. Long has estimated that preparing for the deposition will take him two business days.

Second, GANE hereby reiterates a commitment that it previously made to DCS, that GANE will pay the reasonable costs and fees of DCS's outside experts if it notices their depositions. GANE has not noticed any depositions to date, however, and currently has no plans to depose DCS's outside experts.

Sincerely,

  
Diane Curran

Cc: Service list

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