

RAS 11726

DOCKETED  
USNRC

June 1, 2006 (4:20 pm)

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Before the Atomic Safety and Licensing Board

In the Matter of : Docket No. IA-05-053  
: :  
DALE L. MILLER : ASLBP No. 06-846-02-EA

**DALE L. MILLER'S DISCOVERY  
REQUESTS ADDRESSED TO NRC STAFF**

Pursuant to 10 C.F.R. §§ 2.708 and 2.709, Dale L. Miller requests that the U.S. Nuclear Regulatory Commission (NRC) Staff respond to the following formal discovery requests.

**GENERAL DEFINITIONS**

1. The words "you or your" shall be construed to mean the U.S. Nuclear Regulatory Commission (NRC), including all offices and personnel.
2. "FENOC" refers to FirstEnergy Nuclear Operating Company.
3. "Davis-Besse" refers to FENOC's Davis-Besse Nuclear Power Station.
4. "The Bulletin" refers to NRC Bulletin 2001-01 "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles."
5. "Serial No. 2731" or "Serial 2731" refers to Davis-Besse's September 4, 2001 response to the NRC Bulletin.
6. "Serial No. 2735" refers to Davis-Besse's October 17, 2001 submittal providing additional information in response to the Bulletin.
7. "OI" refers to the NRC's Office of Investigations.

TEMPLATE = SECY-037

SECY-02

8. The "green sheet" refers to Davis-Besse's Review and Approval Report Form (original form on green paper) for NRC communications.

### **I. INTERROGATORIES**

Each Interrogatory shall be answered separately and fully, in writing, and under oath or affirmation and shall include all pertinent information available to NRC personnel with knowledge of the facts or as designated to respond pursuant to 10 C.F.R. § 2.709(a)(2).

#### **INTERROGATORY NO. 1:**

State the name, business address, and position or title of each person who was consulted or supplied information in answering the Interrogatories set forth below.

Designate the Interrogatory or the part of each Interrogatory, for which the identified person was consulted or supplied information.

#### **INTERROGATORY NO. 2:**

State the name, business address, employer, and position or title of each person you intend to use as a witness in this enforcement proceeding. State the subject matter for which each of the witnesses is expected to testify.

#### **INTERROGATORY NO. 3:**

State the name, business address, employer, and position or title of each person you intend to rely upon as an expert witness, including the details of each expert's education, professional qualifications, employment history, and the subject matter on which the expert is expected to testify. State a summary of the grounds for each expert's

opinion and identify all documents, data, or other information that each expert has reviewed, or is expected to rely upon for his or her testimony.

**INTERROGATORY NO. 4:**

Identify by name, business address, position or title all NRC personnel who were involved in the evaluation or issuance of the Enforcement Order directed to Dale L. Miller.

**INTERROGATORY NO. 5:**

If you contend that Mr. Miller received a copy of the Bulletin prior to August 14, 2001, state the basis for your contention.

**INTERROGATORY NO. 6:**

Do you contend that Mr. Miller was assigned to assist with Bulletin response preparation before August 17, 2001, the date he started to assemble a utilities response group? If so, state all facts in support of the contention with references to the specific testimony or documents relied upon.

**INTERROGATORY NO. 7:**

Do you contend that Mr. Miller received a draft copy of Serial No. 2731 prior to August 20, 2001, when he received "draft 8-18-1.doc" (DLM 0000054)? If so, state all facts in support of the contention with references to the specific testimony or documents relied upon.

**INTERROGATORY NO. 8:**

Do you contend that Dale Miller, Compliance Supervisor in FENOC's Regulatory Affairs unit, had greater responsibility for the review of Serial No. 2731 than Dale R.

Wuokko, Licensing Supervisor in FENOC's Regulatory Affairs unit? If so, state all facts in support of the contention with references to the specific testimony or documents relied upon.

INTERROGATORY NO. 9:

If you contend that Regulatory Affairs Contractor Rodney M. Cook did not report to Dale Wuokko during the preparation of Serial No. 2731, state all facts in support of the contention with references to the specific testimony or documents relied upon.

INTERROGATORY NO. 10:

Do you contend that Mr. Miller was legally required to act upon *copies* of "several E-mails" received from Senior Design Engineer Prason Goyal during August of 2001 (including copies dated August 27, 2001 and August 30, 2001)? If so, state the regulatory basis for this requirement.

INTERROGATORY NO. 11:

Do you contend that Prason Goyal's August 27, 2001 e-mail raised a concern to Mr. Miller about the accuracy and completeness of Serial No. 2731? If so, state all facts that support the contention with references to the specific testimony or documents relied upon.

INTERROGATORY NO. 12:

Do you contend that Prason Goyal's August 30, 2001 e-mail raised a concern to Mr. Miller about the accuracy and completeness of Serial No. 2731? If so, state all facts that support the contention with references to the specific testimony or documents relied upon.

**INTERROGATORY NO. 13:**

If you contend that Mr. Miller wrote, inserted, or deleted any language included in any draft of Serial No. 2731, state all facts that support the contention with references to the specific testimony or documents relied upon.

**INTERROGATORY NO. 14:**

If you contend that Mr. Miller reviewed or approved a draft copy of Serial 2731, after he signed his August 30, 2001 concurrence on the FENOC Review and Approval Report form, state all facts that support the contention with references to the specific testimony or documents relied upon.

**INTERROGATORY NO. 15:**

State the basis for your contention that Mr. Miller did not conduct his responsibilities during the preparation of Serial No. 2731, in a manner that was in compliance with the Commission's requirements.

**INTERROGATORY NO. 16:**

State the basis for your contention that Mr. Miller's actions during August 2001, "demonstrated a pattern of deliberate inaccurate or incomplete documentation of information that was required to be submitted to the NRC."

**INTERROGATORY NO. 17:**

State the basis for your contention that Mr. Miller had "sufficient knowledge of the condition of the RPV head and the limitations experienced during RPV head inspections" that he deliberately provided materially incomplete and inaccurate information when, on August 30, 2001, he concurred in the Bulletin response.

**INTERROGATORY NO. 18:**

State the basis for your contention that Mr. Miller's actions affected the health and safety of the public in a manner that requires his prohibition from employment in NRC-licensed activities for a period of five years from the date of the Order.

**II. SPECIFIC DOCUMENT REQUESTS**

The following requests are for the production of specific documents already in the custody of the NRC. Copies of the referenced redacted pages or omitted documents are not otherwise available to Mr. Miller and are necessary to his defense against the matters raised in the January 4, 2006 Enforcement Order. Redacted portions of the documents referenced below obviously contain testimony or statements by witnesses, NRC personnel, or investigative agents with specific knowledge of the matters already charged in this proceeding.

**DOCUMENT REQUEST NO. 1:**

An unredacted copy of the OI Report for Case No. 3-2002-006 dated August 22, 2003 (30000-30232), including the redacted parts of or entire pages labeled 30003-30005, 30007-30010, 30017, 30030-30031, 30042-30053, 30063-30074, 30080-30082, 30101-30102, 30105- 30106, 30124-30126, 30130-30131, 30134-30135, 30174-30178, 30185-30186, 30193- 30195, 30197, and 30200-30210. Please include OI Report pages 17 and 18.

**DOCUMENT REQUEST NO. 2:**

An unredacted and complete copy of all Exhibits issued on September 5, 2003 to OI Report No. 3-2002-06 (02554A). A list of the exhibits is set out at 02555A-02571A.

### **III. REQUESTS FOR ADMISSION**

In accordance with 10 C.F. R. § 2.708(b)(1), each requested admission shall be considered made unless a sworn statement is filed on or by June 15, 2006, specifically denying the relevant matter or setting forth, in detail, the reasons why it can neither be truthfully admitted nor denied. If made, objections must be in writing, stating the reasons why some or all of the matters involved are privileged, irrelevant, or otherwise improper in whole or in part.

1. At all times relevant, Dale L. Miller was the Compliance Supervisor of Davis-Besse's Regulatory Affairs unit, and Dale R. Wuokko was the Licensing Supervisor of Davis-Besse's Regulatory Affairs unit.

2. At all times relevant, Dale Miller and Dale Wuokko supervised Regulatory Affairs' contractor Rodney M. Cook.

3. At all times relevant, Frank W. Kennedy was a member of the Regulatory Affairs Licensing unit.

4. At all times relevant, David H. Lockwood was the Manager of Regulatory Affairs.

5. At all times relevant, Lonnie W. Worley was the Director of Nuclear Services.

6. On July 23, 2001, the NRC's Stephen P. Sands called Dale Wuokko to advise "of an upcoming meeting between the NRC and NEI regarding the NRC expectations for licensee responses" to the forthcoming Bulletin. (DLM 000001).

7. Dale Wuokko's notes of Mr. Sands's July 23, 2001 telephone call stated that Mr. Wuokko would inform the cognizant engineers in Licensing and Engineering of the upcoming meeting about the Bulletin. (DLM 000001).

8. On July 24, 2001, Dale Wuokko notified David Lockwood of the upcoming NRC meeting to discuss the Bulletin, and sent a copy to Frank Kennedy. (NRC020-3095).

9. On July 31, 2001, the NRC informed Dale Wuokko that the Bulletin would be issued no sooner than August 3 and no later than August 8, 2001. (NRC021-0874).

10. On August 3, 2001, Frank W. Kennedy initiated Condition Report 01-2012, and assigned Regulatory Affairs' Licensing unit as the Bulletin "owner," with input for the response provided by the Alloy 600 Team, Design Engineering (DEMS), System Engineering (SYME), and Quality Control (QC). (DLM 000001- DLM 000005).

11. On August 7, 2001, Dale Wuokko, Frank Kennedy's supervisor, approved Condition Report 01-2012. (DLM 000002).

12. On August 8, 2001, Prasoon Goyal sent an e-mail memo to Stephen Hunt of Dominion Engineering, Inc., stating that Davis-Besse's "last inspection was partial and detected boric acid accumulation which was attributed to a CRDM flange leak." (NRC008-0993-NRC008-0998).

13. Prasoon Goyal sent a copy of his August 8, 2001 e-mail that "the last inspection was partial and detected boric acid accumulation which was attributed to a CRDM flange leak" to Andrew Siemaszko, Mark McLaughlin, Frank Kennedy, Theo Swim, John Cunnings, and Charles Daft. (NRC008-0993-NRC008-0998).

14. On August 8, 2001, Frank Kennedy forwarded to Rodney Cook a copy of Prason Goyal's August 8, 2001 e-mail that "the last inspection was partial and detected boric acid accumulation which was attributed to a CRDM flange leak." (NRC008-0993-NRC008-0998).

15. On August 9, 2001, Rodney Cook forwarded to Dale Wuokko a copy of Prason Goyal's August 8, 2001 e-mail that "the last inspection was partial and detected boric acid accumulation which was attributed to a CRDM flange leak." (NRC008-0993-NRC008-0998).

16. Davis-Besse's August 9, 2001 Bulletin Response Action Plan gave Bulletin response assignments to Frank Kennedy, Prason Goyal, Andrew Siemaszko, and Rodney Cook. (NRC020-3011-NRC020-3012).

17. On August 9, 2001, Dale R. Wuokko e-mailed Davis-Besse's Bulletin Response Action Plan to Director, Lonnie W. Worley, with a copy to Frank Kennedy and Rodney Cook. (NRC020-3010-NRC020-3012).

18. By e-mail dated August 9, 2001, Prason Goyal sent a draft Bulletin response that "reworded the first sentence of 1998 inspection results," to Andrew Siemaszko, Frank Kennedy, John Cunnings, and Theo Swim. (NRC007-1766-NRC007-1768).

19. On August 9, 2001, Frank Kennedy forwarded a copy of Prason Goyal's August 9, 2001 e-mail and draft response to Rodney Cook. (NRC007-1766-NRC007-1768).

20. Dale Miller did not attend a Bulletin response meeting on August 11, 2001.
21. On August 11, 2001, Dale R. Wuokko did not e-mail to Mr. Miller an updated "Action Plan" resulting from "this morning's meeting and work completed today." Mr. Wuokko sent the e-mail and attached, updated Bulletin Response Action Plan to Prasoon Goyal, Lonnie Worley, John Messina, Frank Kennedy, David Lockwood, Steven Moffitt, David Geisen, Andrew Siemaszko, John Cunnings, Charles Steagal, Theo Swim, and Rodney Cook, with a copy to Michael Leisure. (NRC021-0876-NRC021-0878).
22. On August 13, 2001, Rodney Cook asked Prasoon Goyal, via e-mail, to confirm Mr. Goyal's and his assignments for Bulletin Items 1.b and 1.e, so that Mr. Cook could have "Frank update the Action Plan". (NRC007-2678).
23. On August 14, 2001, Dale Wuokko sent an "updated" Bulletin Action Plan to Rodney Cook, Frank Kennedy, Prasoon Goyal, Andrew Siemaszko, and David Lockwood, with a copy to Michael Leisure. (NRC020-2936-NRC020-2939).
24. On August 14, 2001, Stephen Hunt of Dominion Engineering, Inc. sent to Prasoon Goyal a key excerpt applicable to Davis-Besse from a draft generic industry plan, with a suggested basis for not performing an inspection before the end of 2001. (NRC010-0379-NRC010-0380).
25. The August 14, 2001 Davis-Besse key excerpt forwarded to Prasoon Goyal by Stephen Hunt (NRC010-0379-NRC010-0380) included the following language about Davis-Besse's 2000 discovery of significant boric acid, and cleanup leaving the head in good condition for a 2002 inspection:

Davis-Besse performed an inspection of the vessel head in March of 2000. While this inspection showed no evidence of leakage from PWSCC cracks in CRDM nozzles, the inspection sensitivity was affected by a significant amount of boric acid on the vessel head resulting from a CRDM flange gasket leak. As part of the cleanup of the boric acid from the flange leak the head was left in good condition for the scheduled inspection in April 2002. The utility will watch the results of the Fall 2001 inspections at TMI-1 and Crystal River 3 to determine if this response should be modified as a result of the inspections at these B&W plants.

26. On August 14, 2001, Dale Miller received his first copy of the NRC Bulletin (DLM 0000018-20).
27. On August 17, 2001, Dale Miller began his first Bulletin-related assignment at Director Lonnie Worley's request, to contact other utilities to assemble a response group (DLM 0000039-40; DLM 0000042-4; DLM 0000046-51).
28. By e-mail dated August 17, 2001 at 2:58 p.m., Dale Miller forwarded to Rodney Cook Dominion Resources Services' draft response to the Bulletin. (DLM 0000041).
29. On August 20, 2001, Rodney Cook e-mailed the latest draft of the Bulletin, "Serial 2731 Draft 8-18-01.doc". He sent his e-mail draft to Prason Goyal, Frank Kennedy, and Mark McLaughlin, with copies to Dale Wuokko, Dale Miller, and David Lockwood. (DLM 0000054-70).
30. In his August 20, 2001 e-mail, Rodney Cook stated that he planned on getting his new draft "out into Green Sheet review today". (DLM 0000054).
31. By e-mail dated August 20, 2001, Rodney Cook wrote to Dale Wuokko about the draft response to the Bulletin. Mr. Cook stated: "The letter changed a lot from

the one I originally had last week," and the draft "e-mailed earlier does not follow any template, but follows the Bulletin. I had a copy of Dominion's draft response and used it as a guide. Just some background for you." (NRC007-2279).

32. On August 22, 2001, Prasoon Goyal forwarded to Rodney Cook the revisions made by Stephen Fyfitch of Framatome to "Davis-Besse BulletinItem [sic] 3 Response Draft2.doc". (NRC008-0921-NRC008-0939). Mr. Goyal also sent copies to Frank Kennedy, Andrew Siemaszko, Mark McLaughlin, and Charles Daft. (NRC008-0921-NRC008-0939).

33. On August 22, 2001 at 3:42 p.m., Rodney Cook e-mailed a "new draft of Serial 2731" with the subject line "Serial 2731 revisited." Mr. Cook wrote that most of the changes "are editorial," but he was including "Framatome's write-up that kinda [sic] justifies why we are okay." (NRC 008-0189-NRC 008-0213).

34. Rodney Cook's "Serial 2731 revisited" e-mail dated August 22, 2001, attached a draft Bulletin response identified as "Draft 8-22-01.doc". (NRC008-0189 - NRC008-0213).

35. Rodney Cook e-mailed "Draft 8-22-01.doc" to Mark McLaughlin, Prasoon Goyal, Dale Wuokko, Dale Miller, and Andrew Siemaszko, with a copy to Frank Kennedy. (NRC008-0189- NRC008-0213).

36. On August 23, 2001 at 10:29 a.m., Dale Miller sent an agenda via e-mail, for the first utilities group teleconference on August 23, 2001 at 1:00 p.m., "to discuss the response to NRC Bulletin 2001-01". Mr. Miller sent his e-mail to representatives from other utilities and to FENOC's Dale Wuokko, Rodney Cook, Frank Kennedy, Mark

McLaughlin, Prasoon Goyal, Charles Daft, David Lockwood, Lonnie Worley, Diana Chambers, and Cheryl Lyons. (DLM 00000238).

37. Dale Miller's handwritten "Agenda" notes reflect his confusion as to why Davis Besse was performing a "qualified visual inspection" in 13RFO, yet two other utilities were performing an "effective visual inspection". (DLM 00000175-177).

38. "8/23/01 Bulletin 2001-01 Conference Call" notes state that the NRC told a utility in a "conference call that they meant to say 'effective inspection'". A second utility reported that it would "be using 'qualified' in response" to the Bulletin. (DLM 00000180).

39. On August 23, 2001, Rodney Cook sent an "advanced [sic] copy of Serial 2731" to Vice President Guy Campbell, Lonnie Worley, Steven Moffitt, and John Messina, with copies to their assistants. (NRC005-3893).

40. On August 27, 2001, Rodney Cook sent an e-mail with the subject "Serial 2731 8-27-01 Version 1b" to Mark McLaughlin, Prasoon Goyal, Andrew Siemaszko, Frank Kennedy, Dale Miller, Dale Wuokko, and David Lockwood. (NRC007-1728).

41. Rodney Cook's August 27, 2001 e-mail about Version 1b stated: "Well, here's another version. It deleted the reference to 90% of the nozzles being inspected during the 2000 inspection, . . . to ensure that we state that not all of the head was accessible or inspected for inspection for whatever reason . . . and incorporates a discussion of the review of the 1998 and 2000 video tapes since May 2001. . . ." (NRC007-1727-8).

42. On August 28, 2001 at 2:52 p.m., Rodney Cook sent an email to FENOC's Dennis Weakland with copies to Prasoon Goyal and Dale Miller, about the "Davis-Besse Bulletin 2001-01 Draft Response". Mr. Cook wrote he attached a "draft of our response. This is the iteration that is presently in final review." He attached "Serial 2731 8-28-01 Version 1e.pdf." (DLM 00000334-359).

43. On August 28, 2001, at 3:07 p.m., Rodney Cook sent an e-mail to Mark McLaughlin on the subject of "Serial 2731 Version 1e," stating the version "[s]hould be the last change." Mr. Cook asked Mr. McLaughlin to sign the green sheet, have Messrs. Missig, Nelson, and Messina sign it, and "see about getting it back to me today if possible. . . ." (NRC001-1864).

44. On August 28, 2001, Prasoon Goyal signed Davis-Besse's review and approval report form for the Bulletin response, as the responsible engineer-mechanical design. (NRC027-1692).

45. On August 28, 2001, Dale Wuokko gave his review and approval consent to the Bulletin response "per telecon" as "Supervisor, DB Licensing". (NRC027-1692).

46. On August 29, 2001, Rodney Cook sent a new version of Serial 2731 called "New Expansion discussion" to Mark McLaughlin, Andrew Siemaszko, Prasoon Goyal, David Geisen, Dale Miller, and David Lockwood. Mr. Cook wrote that the new version incorporated "the discussion similar to ANO's [to] provide a supplement 60 days prior to the outage . . . based on experience at other utilities." Mr. Cook noted "[t]he changes are on pages 5 and 7, with a new paragraph." (NRC007-1763).

47. On August 29, 2001, Rodney Cook drafted a Bulletin response he identified as "Serial 2731 8-29-01 Version 1f-ANO.PDF". (NRC007-2442-NRC007-2466).
48. On August 29, 2001, Rodney Cook circulated to Dale Miller a new "Serial 2731 8-29-01 Version 1g-ANO.PDF." (DLM 00000417-442).
49. On August 30, 2001, Dale Miller signed FENOC's review and approval form for the Bulletin response as "Supervisor DB Compliance". (NRC027-1692).
50. On August 30, 2001, Lonnie Worley signed Davis-Besse's review and approval form for the Bulletin response as Director, Nuclear Services. (NRC027-1696).
51. On or before September 4, 2001, Vice President Guy G. Campbell made handwritten comments on a draft of Serial No. 2731. (NRC 005-3701-NRC005-3725).
52. On September 4, 2001, Rodney Cook incorporated Vice President Campbell's handwritten comments into a new Bulletin response "Draft 9-4-01, Version 1k-GGC comments.doc." (NRC007-0681-NRC007-0706).
53. On September 4, 2001, David Lockwood signed Davis-Besse's review and approval form for the Bulletin response as Manager, Regulatory Affairs. (NRC027-1692).
54. On September 4, 2001, Vice President Guy G. Campbell signed FENOC's review and approval report for the Bulletin response. (NRC027-1692).
55. FENOC's review and approval report, Block 14, provides: Initiator checks and/or enters the desired reviewer(s). The technical accuracy of a response to the NRC is the responsibility of the Director and Management individual assigned the action." (NRC027-1697).

56. Condition Report 01-2012's Corrective Action section dated September 5, 2001 stated that Rodney Cook completed the Bulletin response by September 4, 2001, and Dale Wuokko entered approval for the "implementing organization". (DLM 000005).

57. Dale Miller did not write or add any words, sentences, or paragraphs to any of the Bulletin response drafts generated during August and September of 2001.

58. Because Dale Miller did not begin his utilities group assignment until August 17, 2001, and did not receive a Bulletin response draft until August 20, 2001, he had to rely upon the engineers assigned Bulletin response actions in early August 2001, to provide complete and accurate information.

59. Dale Miller had no background or experience in the subject of RPV head inspections or nozzle cracking.

60. On October 17, 2001, Dale Miller signed and dated the Review and Approval Report form for Serial No. 2735 (DLM 00000484). Serial No. 2735 provided updated and additional information in support of the basis for Davis-Besse's continued safe operation until its next refueling outage. (DLM 00000485-558).

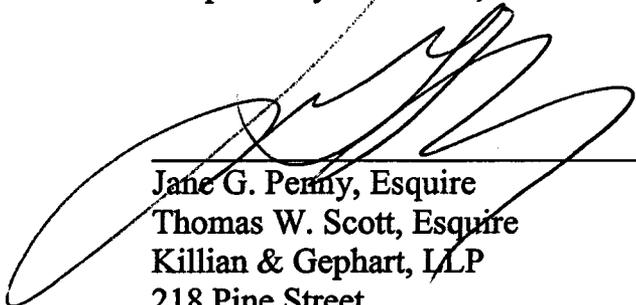
61. On October 4, 2002, Rodney Cook testified that he and Praseon Goyal "discussed that Arkansas had been inspecting their head through the mouse holes for several years." (NRC002-1463).

62. David Geisen asked Andrew Siemaszko to "procure the same video rig used by ANO [Arkansas Nuclear One power plant] to inspect their head." (NRC025-1014).

63. David Geisen had made the purchase request for "RV Head Inspection - Everest VIT Video Probe System, ROVVER System" on or before June 26, 2001. (NRC024-1097).

64. On September 2, 2004, Dale Miller told OI Senior Special Agent Joseph M. Ulie, OI Special Agent Michelle F. Janicki, Senior Reactor Inspector James A. Gavula, and Department of Justice representatives that he had looked up the word "impediment" in preparation for his October 22, 2002 OI interview.

Respectfully submitted,



Jane G. Penny, Esquire  
Thomas W. Scott, Esquire  
Killian & Gephart, LLP  
218 Pine Street  
P.O. Box 886  
Harrisburg, PA 17108-0886  
[jpenny@killiangephart.com](mailto:jpenny@killiangephart.com)  
[tscott@killiangephart.com](mailto:tscott@killiangephart.com)

Counsel for Dale L Miller  
Dated: June 1, 2006

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

Before the Atomic Safety and Licensing Board

In the Matter of	:	Docket No.	IA-05-053
	:		
DALE L. MILLER	:	ASLBP No.	06-846-02-EA
	:		

CERTIFICATE OF SERVICE

I certify that on June 1, 2006, copies of Dale L. Miller's "Discovery Requests" were served upon the following persons through the U. S. mail, and electronic mail where indicated by an asterisk (\*):

Administrative Judge  
Michael C. Farrar, Chair  
Atomic Safety and Licensing Board Panel  
Mail Stop: T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
E-mail: mcf@nrc.gov \*

Administrative Judge  
E. Roy Hawkens  
Atomic Safety and Licensing Board Panel  
Mail Stop: T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
E-mail: erh@nrc.gov \*

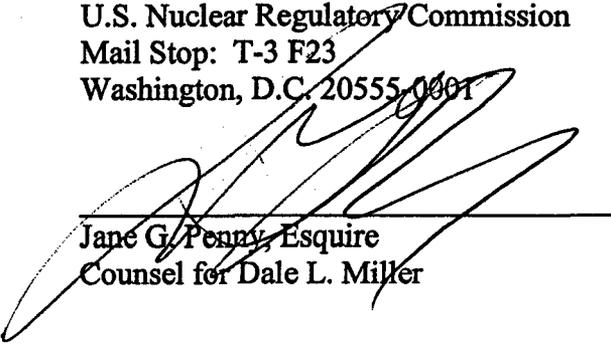
Sara E. Brock, Esquire  
Mary C. Baty, Esquire  
Office of the General Counsel  
Mail Stop: O-15 D21  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
E-mail: seb2@nrc.gov \*  
E-mail: mcb1@nrc.gov \*

Administrative Judge  
Nicholas G. Trikourous  
Atomic Safety and Licensing Board  
Mail Stop: T-3 F23  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001  
E-mail: ngt@nrc.gov \*

Office of Commission Appellate Adjudication  
U.S. Nuclear Regulatory Commission  
Mail Stop: O-16 C1  
Washington, D.C. 20555-0001

Office of the Secretary  
Attn: Rulemaking and Adjudications Staff  
Mail Stop: O-16 C1  
Washington, D.C. 20555-0001  
Email: hearingdocket@nrc.gov \*

Adjudicatory File  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Mail Stop: T-3 F23  
Washington, D.C. 20555-0001

  
Jane G. Penny, Esquire  
Counsel for Dale L. Miller