

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
  
ATOMIC SAFETY AND LICENSING BOARD  
Before Administrative Judges:

August 8, 2006 (11:25am)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

Michael C. Farrar, Chairman  
E. Roy Hawkens  
Nicholas G. Trikouros

	)	
In the Matter of	)	Docket No. IA-05-052
	)	
DAVID GEISEN	)	ASLBP No. 06-845-01-EA
	)	
	)	

**INITIAL DISCOVERY DISCLOSURE OF DAVID GEISEN**

David Geisen ("Geisen"), by counsel, and pursuant to 10 C.F.R. § 2.704(a), makes the following initial discovery disclosure in the above-captioned action:

A. Introduction

1. Pursuant to 10 C.F.R. § 2.704(a), Geisen objects to, and is not hereby, disclosing any information or documents relating to issues in the "Order Prohibiting Involvement In NRC-Licensed Activities" by the U.S. Nuclear Regulatory Commission ("NRC") dated January 4, 2006 in the above-referenced action ("January 4, 2006 Order") that (a) were not alleged with particularity in the January 6, 2004 Order, (b) constitute mere speculation or (c) reflect purely legal conclusions. Geisen also objects to disclosing information or documents simply to prove the non-occurrence of events, communications and conditions alleged in the January 4, 2006 Order for which the NRC has not provided any factual basis or support. In that regard, Geisen incorporates herein by reference the statements, allegations and information contained in the Answer that he filed and served on February 23, 2006 in response to the January 4, 2006 Order.

TEMPLATE = SELY-026

SELY-02

2. Except as otherwise described in Section D below, Geisen is not hereby disclosing, listing or describing any information in his possession, custody or control that is protected from disclosure by the attorney-client privilege, the attorney work-product doctrine or other applicable statutory or common law privileges. Geisen is making this Initial Disclosure subject to and without waiving such privileges and/or work product protection.

3. The disclosures herein are based on certain non-privileged information that is presently available to Geisen. Formal discovery has not commenced in this matter, and Geisen reserves the right, if and as required under 10 C.F.R. § 2.704(e), to supplement this Initial Disclosure as discovery commences and proceeds in this matter.

4. The identification of any persons or documents herein is not attended, and shall not be deemed or construed, as an assertion or admission by Geisen that such persons actually have knowledge (or such documents are) relevant to disputed issues alleged with particularity in the pleadings in the above-captioned action. Geisen expressly reserves any objections he may have to the admissibility of any testimony, documents or other evidence at the hearing of this matter.

**B. 10 C.F.R. § 2.704(a)(1) Disclosure**

Geisen hereby identifies the following persons or entities of whom he is presently aware and who may have discoverable information that may be relevant to disputed issues alleged with particularity in the pleadings.

1. Attached hereto as Exhibit 1 are the names (including last known addresses and telephone numbers) of persons who are or were employees of FirstEnergy Nuclear Operating Company (“FENOC”) and who may have information relating, in whole or in part, to disputed issues alleged with particularity in the pleadings, including, without limitation, the following

issues: (a) the condition of pressurized water nuclear power reactors (“PWR”) at the Davis-Besse Nuclear Power Station (“Davis-Besse”) during certain time periods alleged in the January 4, 2006 Order; (b) the timing, substance and reporting of inspections of PWR at Davis Besse during certain time periods alleged in the January 4, 2006 Order; (c) the occurrence or non-occurrence of any events, communications or conditions alleged with particularity in the January 4, 2006 Order; (d) Geisen’s knowledge or lack of knowledge of any events, communications or conditions alleged with particularity in the January 4, 2006 Order; (e) any actions or omissions of Geisen alleged with particularity in the January 4, 2006 Order; and (f) information and documents communicated or made available to the NRC regarding the topics described in paragraph B(1)(a)-(e) above.

2. Attached hereto as Exhibit 2 are the names (including any last known addresses and telephone numbers) of persons who are or were employed as or by consultants or subcontractors to FENOC and who may have information relating, in whole or in part, to disputed issues alleged with particularity in the pleadings, including, without limitation, the issues listed in paragraph B(1) above.

3. Attached hereto as Exhibit 3 are the names (including any last known addresses and telephone numbers) of persons who are or were employees of the NRC who may have information relating, in whole or in part, to disputed issues alleged with particularity in the pleadings, including, without limitation, the issues listed in paragraph B(1) above: These persons include, without limitation, persons who signed, or otherwise participated in the drafting and preparation of, the August 22, 2003 Office of Inspections Report. Geisen expressly reserves the right to disclose and identify other current or former employees of the NRC who may have

information relating, in whole or in part, to disputed issues alleged with particularity in the pleadings but whose identities and/or potential knowledge are not presently known to Geisen.

4. Attached hereto as Exhibit 4 are the names (including any last known addresses and telephone numbers) of persons other than those described in paragraphs B(1)-(3) who may have information relating, in whole or in part, to disputed issues alleged with particularity in the pleadings, including, without limitation, the issues listed in paragraph B(1) above.

5. Geisen also refers to the names, identities and locations of certain persons or entities listed in non-privileged documents that have been produced or disclosed in this matter by the NRC Staff, Geisen or any non-parties, including such documents falling within the categories described in Section C, below.

C. 10 C.F.R. § 2.704(a)(2) Disclosure

With respect to any non-privileged documents, data compilations, and tangible things that are relevant to disputed issues alleged with particularity in the pleadings in the above-captioned action, Geisen states as follows:

1. Effective October 20, 2002, Geisen voluntarily ended his employment with FENOC. Upon his departure from FENOC, Geisen did not have or take any “documents, data compilations, [or] tangible things in [his] possession, custody or control” that were “relevant to the disputed issues alleged with particularity in the pleadings” in the above-captioned matter, within the meaning of 10 C.F.R. § 704(a)(2).

2. During the above-captioned action, Geisen, through his attorneys, has received copies of the documents referenced on Exhibit 5 attached hereto, which were produced or disclosed by the NRC Staff. Unless requested and required to do so, Geisen shall not individually list or re-produce those documents to NRC Staff pursuant to 10 C.F.R. § 704(a)(2).

3. Geisen, through his attorneys, has received from the U.S. Department of Justice copies of grand jury testimony relating to the criminal matter styled *United States v. David Geisen*, Case No. 3:06CR712 (N.D. Ohio). Pursuant to Fed. R. Crim. Proc. 6(e) and a protective order entered by the United States District Court for the Northern District of Ohio, neither Geisen nor his counsel are permitted at this time to disclose those documents to non-parties to the Northern District of Ohio matter. Accordingly, at this time, Geisen cannot and will not list or produce copies of those documents in the above-captioned action.

4. Except for the documents described above, Geisen does not currently have in his possession, custody or control any non-privileged documents, data compilations, and tangible things that are relevant to disputed issues alleged with particularity in the pleadings in the above-captioned action.

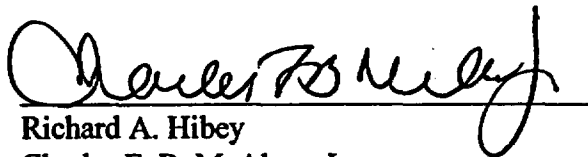
D. Privileged Documents, Data Compilation and Tangible Things

Since approximately October 2002, Geisen has been represented by counsel relating to the subject matter of the January 4, 2006 Order and the underlying investigation. At varying times during that period, Geisen's attorneys have included the law firms of Killian & Gephart, LLP and Miller & Chevalier Chartered. Geisen hereby asserts and preserves all protections, including the attorney-client privilege, the work product doctrine and other applicable statutory and common law privileges, regarding all communications he has sent to or received from his attorneys since October 2002 relating to the above-captioned action, including any such communications or documents relating in any way to disputed issues alleged with particularity in the pleadings in the above-captioned action. Unless required by order of the panel in the above-referenced action, Geisen shall not log or specifically identify such communications or documents.

Unless required by order of panel in the above-captioned action, Geisen shall not log or specifically identify any communications or documents in the possession, custody or control of his attorneys that constitute or reflect attorney work product, including, without limitation, any such communications or documents prepared by or on behalf of Miller & Chevalier Chartered.

Unless required by order of the panel in the above-captioned action, and on the basis of the joint defense and common interest privileges, Geisen shall not log or specifically identify any communications or documents that his attorneys may have sent to or received from counsel for any persons or entities who are the subject of any criminal, civil or administrative indictment, charges, investigations, allegations or claims that are similar or relate to those of which Geisen is or was the subject and that give rise to the joint defense or common interest privileges.

Respectfully Submitted,



Richard A. Hibey  
Charles F. B. McAleer, Jr.  
Andrew T. Wise  
Matthew T. Reinhard  
MILLER & CHEVALIER CHARTERED  
655 15<sup>th</sup> Street, N.W., Suite 900  
Washington, D.C. 20005  
(202) 626-5800 (telephone)  
(202) 628-0858 (facsimile)  
*Counsel for David Geisen*

Dated: July 28, 2006

**UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION**

**ATOMIC SAFETY AND LICENSING BOARD  
Before Administrative Judges:**

**Michael C. Farrar, Chairman  
E. Roy Hawkens  
Nicholas G. Trikouros**

_____ )	
In the Matter of )	Docket No. IA-05-052
)	
DAVID GEISEN )	ASLBP No. 06-845-01-EA
)	
_____ )	

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY, on the 28<sup>th</sup> day of July, 2006, that copies of David Geisen's Initial

Discovery Disclosure in the above-captioned matter were served on the following persons via

email as indicated by an (\*) and by regular mail as indicated by an (\*\*):

Office of the Secretary (\*), (\*\*)  
Attn: Rulemaking and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Mail Stop: O-16 C1  
Washington, D.C. 20005  
E-mail: [hearingdocket@nrc.gov](mailto:hearingdocket@nrc.gov)

Michael A. Spencer (\*), (\*\*)  
[MAS8@nrc.gov](mailto:MAS8@nrc.gov)  
Sara Brock (\*), (\*\*)  
[SEB2@nrc.gov](mailto:SEB2@nrc.gov)  
Counsel for NRC Staff  
U.S. Nuclear Regulatory Commission  
Office of the General Counsel  
Mail Stop: O-15 D21  
Washington, D.C. 20555-0001

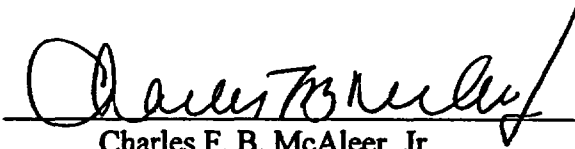
Michael C. Farrar (\*), (\*\*)  
Administrative Judge, Chair  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Mail Stop: T-3 F23  
Washington, D.C. 20555-0001  
E-mail: [mcf@nrc.gov](mailto:mcf@nrc.gov)

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

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

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

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

  
Charles F. B. McAleer, Jr.



**GEISEN DISCOVERY DISCLOSURE EXHIBIT 1**

**FIRSTENERGY NUCLEAR OPERATING COMPANY (FENOC)  
EMPLOYEES**

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Ackerman, Charles E.	Supervisor, Quality Assurance Engineering	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Ambrozy, John	Carpenter, Contractor	Davis-Besse Nuclear Power Station c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Baumgardner, Bradley J.	Radiation Protection Health Physicist	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Bergendahl, Howard W.	Former Vice President (former Plant Manager)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Bunker, Philip A.	Master Mechanic	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Byrd, Kendall W.	Supervisor - Analysis and Probabilistic Safety Assessment Unit at Davis-Besse	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Campbell III, Guy G.	Former Vice President (FENOC)	c/o John F. McCaffrey, Esq. McLaughlin & McCaffrey, LLP Easton Center, Suite 1350 1111 Superior Avenue Cleveland, OH 44114- 2500	216-623-0900
Chambers, Diana	Administrative Assistant	Davis-Besse c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Chimahusky, Edward	System Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Chung, George	System Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Coad Jr., Robert B.	Radiation Protection Manager, Perry Nuclear Plant (former Assistant Plant Manager, Davis- Besse)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Coakley, Scott A.	Former Project Manager (Outage Manager)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Cobbledick, Thomas D.	Shift Engineer (former Operations Superintendent)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Cook, Rodney M.	Regulatory Affairs Consultant (Contract with FENOC)	c/o John F. Conroy, Esquire Gordon & Ermer Two Lafayette Center 1133 21 <sup>st</sup> Street, NW, Suite 450 Washington, D.C. 20036-3354	202-883-3400

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Cunnings, John	Mechanical Systems Supervisor	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Daft, Charles T.	Staff Nuclear Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Donnellon, Robert	Director of Maintenance (former Director of Engineering)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Eischen, Gary V.	Senior Health Physics Serviceman	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Eshelman, David L.	Manager, Fleet Asset Management (former Plant Engineering; Manager)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Feckley, James W.	Radiation Protection Supervisor	Davis-Besse Nuclear Power Station c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

Name	Title	Address	Telephone Number
Fehr, Kathryn N.	Administrative Support	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Gillespie, Greg W.	Acting Supervisor, Radiation Protection Chemistry	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Goyal, Prasoon	Former Senior Design Engineer (FENOC)	c/o James C. Howarth, Esquire 2000 Penobscot Bldg. 645 Griswold Street Detroit, MI 48226-4009	313-962-3500
Gudger, Dave	Manager, Performance Improvement (Corrective Action Owner)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Haley, Daniel E.	System Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Hartigan, John	Senior Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Hengge, Craig	System Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Hilkens, Bill	Quality Control Inspector	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Hovland, Robert C.	Supervisor of Electrical Controls Unit	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Huston, Roger W.	Contractor (For FENOC)	Licensing Support Services	
Jennison, Laura	Clerk - Licensing department	Davis-Besse c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Johnson, John	PCAQR Review Board Chairman	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Kennedy, Frank W.	Retired (previously - Licensing Specialist)	Davis-Besse Nuclear Power Station c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Klett, Lee D.	Senior Reactor Operator License Training	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Lang, Ted	Root Cause Investigation Team	Davis-Besse c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Leisure, Michael K.		c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Lewis, Arthur J.	Shift Manager, Shift 5	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Liska, Dennis A.	Mechanical Maintenance Planner	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Lockwood, David H.	Former Manager of Regulatory Affairs	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Mainhardt, Peter J.	System Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
McIntyre, Glenn R.	Former Supervisor, Mechanical Systems	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
McLaughlin, Mark	Senior Project Manager (Former Alloy 600 Team Leader, Davis-Besse, FENOC)	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
Messina, John	Director Work Management	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Miller, Dale L.	Consultant, Perry Nuclear Plant (former Supervisor of Compliance, Davis-Besse)	c/o Jane G. Penny, Esq. Killian & Gephart, LLP P.O. Box 886 Harrisburg, PA 17108	717-238-5430
Moffitt, Steve	Former Director, Technical Services	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308



Name	Title	Address	Telephone Number
Molpus, Walt	System Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Morrison, Neil	System Engineer, Beaver Valley	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Mugge, William A.	Work management	Davis-Besse c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Munson, Dewey	In-Service Inspection group	Davis-Besse Nuclear Plant c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Myers, Lew	Chief Operating Officer and Acting Vice President	Davis-Besse c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Otermat, Jonathan E.	Advanced Nuclear Engineer	Davis-Besse c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Rogers, Joseph W.	Former Outage Director and Plant Engineering Manager	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Rossomme, Randall L.	Supervisor of Nuclear Quality Assessment, Beaver Valley	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Saunders, Robert F.	President	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Seniuk, Peter J.	Inservice Inspection Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Shepherd, Michael D.	Senior Staff Nuclear Advisor (former Inservice Inspector)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Siemaszko, Andrew	Former System Engineer (FENOC)	c/o Billie Pirner Garde, Esquire John M. Clifford, Esquire Clifford & Garde 1707 L Street, NW, Suite 500 Washington, D.C. 20036	202-289-8990
Simon, Joseph P.	Lead Radiation Technician	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Slyker, Rebecca J.	Director Nuclear Services	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
St. Clair, Virgil	Health Physics Services Manager	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Swim, Theo S.	Nuclear Consultant (former Supervisor of Mechanical Structural Engineering (Design))	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Tabbert, Terry A.	Senior Health Physics Serviceman	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Tipton, Carl A.	Nuclear Qualifications Instructor	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Varmdenabeele, Allan J.	Ombudsman/Employee Concerns Program Owner	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Villines, Jr., Bobbie G.	Component Engineer	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Waggoner, Chris	Graphic Services Formatter, Communications Department	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Weakland, Denis	Nuclear Consultant/Engineer, Beaver Valley	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Willoughby, Michael M.	Former Quality Assurance Auditor	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Wilson, Andrew S.	Superintendent, Maintenance	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Wolf, Gerald M.	Regulatory Affairs	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Wood, John	Former Site Vice President	Will provide home address	

Name	Title	Address	Telephone Number
Worley, Lonnie	Director Nuclear Services	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Wuokko, Dale	Regulatory Affairs Supervisor	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Zellers, Kevin S.	Design Engineering Group - analysis section	Davis-Besse Power Station c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308

**GEISEN DISCOVERY DISCLOSURE EXHIBIT 2**

**FENOC SUBCONTRACTORS**

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Cope, William	Former Framatome video technician	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
Currence, Fred	Field Service Engineer, Refueling Services	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
Fyfitch, Stephen	Metallurgist/ Advisory Engineer	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
Gibbs, Gregory A.	Former contractor (former engineering director, FENOC)	Piedmont Management & Technical Services, Inc. 2502 South 17 <sup>th</sup> St., Suite 118 Wilmington, NC 28401	910-452-3088
Harris Jr., James R.	Component Engineer - Integrated head replacements	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
Killian, Douglas E.		Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
King, Christine	Former title unknown	Formerly of Framatome ANP	

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Kurasz, Alex	Regional Account Manager	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
Loehlein, Steven A.	Principal Nuclear Consultant (Head of root cause team for FENOC)	c/o FirstEnergy Nuclear Operating Company (FENOC) Legal Department 76 S. Main Street Akron, OH 44308	330-384-5308
Martin, John (Jack)	Consultant (Contract with FENOC)	Martin Sigmund Consulting Services, Inc.	
McKim, Alvin D.	Manager of Materials and Structural Analysis Unit	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
Pillow, Ronald C.	Control Rod Drive Mechanism Component Engineer	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000
Schroeder, David R.	Equipment Lead for the Refuel and Video Equipment	Framatome c/o AREVA NP Inc. 3315 Old Forest Road Lynchburg, VA 24501	432-832-3000

**GEISEN DISCOVERY DISCLOSURE EXHIBIT 3****NUCLEAR REGULATORY COMMISSION (NRC) EMPLOYEES**

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Bateman, William H.		U.S. Nuclear Regulatory Commission	301-415-2795
Caldwell, James	Deputy Regional Region Administrator	U.S. Nuclear Regulatory Commission	
Collins, Samuel J.	Deputy Executive Director - Reactor Program	U.S. Nuclear Regulatory Commission	
Diaz, Nils	Chairman	U.S. Nuclear Regulatory Commission	
Gavula, James	Senior Reactor Inspector	Office of Investigations Region III, U.S. NRC 801 Warrenville Road, Suite 255 Lisle, IL 60532-4352	630-829-9775
Hiser Jr., Allen L.	Senior Materials Engineer, Nuclear Reactor Regulation	U.S. Nuclear Regulatory Commission	301-415-5650
Holmberg, Melvin	Reactor Inspector	U.S. Nuclear Regulatory Commission, Region 3 office	
Janicki, Michele	Special Agent	Office of Investigations Region III, U.S. NRC 801 Warrenville Road, Suite 255 Lisle, IL 60532-4352	630-829-9668



<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Lee, Andrea D.	Senior Materials Engineer	U.S. Nuclear Regulatory Commission; Office of Nuclear Regulatory Research	
Long, Steven	Senior Reliability and Risk Analyst, Probabilistic Safety Assessment Branch	U.S. Nuclear Regulatory Commission	
Sands, Stephen	Engineer	U.S. Nuclear Regulatory Commission	
Sheron, Brian W.	Associate director - project licensing and technical assessment	U.S. Nuclear Regulatory Commission	
Simpkins, Douglas	NRC Resident Inspector	U.S. Nuclear Regulatory Commission	
Strosnider Jr., Jack R.	Deputy Director	U.S. Nuclear Regulatory Commission; Office of Nuclear Regulatory Research	301-415-7800
Ulie, Joseph M.	Senior Special Agent	Office of Investigations Region III, U.S. NRC 801 Warrenville Road, Suite 255 Lisle, IL 60532-4352	630-829-9678
Zimmerman, Jacob I.		U.S. Nuclear Regulatory Commission	301-415-1220
Zwolinski, John		U.S. Nuclear Regulatory Commission	

**GEISEN DISCOVERY DISCLOSURE EXHIBIT 4****MISCELLANEOUS**

<b>Name</b>	<b>Title</b>	<b>Address</b>	<b>Telephone Number</b>
Emory, Rodney K.	Engineer, Mechanical Engineering Section (Reactor Engineering Group)	Duke Power Company 500 Old Greenville Hwy # 1A Clemson, SC 29631	864-654-7128
Gutierrez, Jay	Attorney	Morgan, Lewis and Bockius 1111 Pennsylvania Avenue, N.W. Washington, DC 20004	202-739-3000
Hunt, Edwin Steven	Principal Officer	Dominion Engineering 11730 Plaza America Drive, Suite 310 Reston, VA 20190	703-437-1155
Marion, Alexander	Director of Engineering, Nuclear Generation Division	Nuclear Energy Institute 1776 I. Street, NW Suite 400 Washington, DC 20006	202.739.8000
Phillips, Donald R.	Operations Department	Arkansas Nuclear One GBS Building 1448 S.R. 333 Russelville, AK 72801	
Whitaker, David E.	Engineer, Piping Materials Group	Duke Energy Corporation 526 S. Church St. Charlotte, NC 28202	

**GEISEN DISCOVERY DISCLOSURE EXHIBIT 5**

**NRC DISCLOSURES AND PRODUCTIONS**

<b>Date Received</b>	<b>Title</b>	<b>Bates Range</b>
June 5, 2006	Mandatory Disclosures Part 1	00017 - 31652; NRC001-0420 - NRC034-1845 (as detailed in Index dated June 5, 2006)
June 5, 2006	Mandatory Disclosures Part 2	04300 - 20955; NRC001-0446 - NRC034-3074; (as detailed in Index dated June 5, 2006)
June 5, 2006	Mandatory Disclosures Part 3	05352 - 20075; NRC001-0388 - NRC032-2117; (as detailed in Index dated June 5, 2006)
June 5, 2006	Mandatory Disclosures Part 4	00014 - 32464; NRC001-0001 - NRC034-0388 (as detailed in Index dated June 5, 2006)
June 5, 2006	Letter enclosing pages 17 and 18 of the OI Report	30018-C and 30018-D
June 7, 2006	Production Box 1	08459 - 11123; 11384 - 455; 11507 - 12294
June 7, 2006	Production Box 2	15851 - 16013; 16059 - 16071; 16077 - 16081; 16272 - 16318; 16346 - 48; 16351-53; 16357-74; 16048-55; 16387-817; 16837-38; 16847-17035; 17098-219; 17314-358; 17359-411; 17513-605; 17412-512; 17606-634; 17635-735; 17736-18034; 18035-216; 18226-364; 18379-86; 18447; 18411-729; 18740-976; 19017-116; 19119-128; 19408-556
June 7, 2006	Production Box 3	12385 - 454; 12468 - 13064; 13193 - 14005; 14009 - 13; 14018 - 41; 14046 - 273; 14282 - 482; 14484 - 494; 14731 - 15098; 15101 - 15130; 15146 - 478; 15496 - 523; 15668 - 688; 15524; 15568 - 574; 15689 - 15850
June 7, 2006	Production Box 4	05112 - 05157A; 05318 - 05321; 05352 - 06124; 06140 - 170; 06353 - 374; 06466 - 521A; 06539 - 568; 06619 - 637A; 06711 - 735; 06782 - 849; 06898

		- 923A; 06938 - 940A; 07060 - 7707A; 07725 - 823; 07828 - 855A;
July 07, 2006	Production Box 5 (Proprietary)	CD: NRC001-1715 - NRC015-3018; NRC016-0995 - NRC034-3044; DOCUMENTS: 05050 - 05111; 05158-05317; 05322 - 05351; 06125 - 06139; 06171 - 06352; 06375 - 06465; 06569 - 06618; 06638 - 36710; 06736 - 06781; 06850 - 06897; 06924 - 06937; 06941 - 07059; 07708 - 07724; 07824 - 07827; 07856 - 07948
July 07, 2006	Production Box 6 (Proprietary)	03099 - 18979
June 7, 2006	Production Box 7	30000 - 30232; 04770-772; 04822-05009; 05013-016; 07949-959; 08020-385; 19579-593; 19639-645; 19730-20027-1A; 20047-75; 20622-29; 20955; 31792-93; 20961-64; 20967-68; 20971-73; 20988-90; 20996-97; 21027-28; 21032-37; 21039-50; 21062-63; 21074-77; 21081-82; 21099-100; 21112-13; 31794-808; 31917-922; 32101-125; 32146-204; 32206-464
June 7, 2006	Production Box 8	Videos/DVDs and 30722-745; 31023-678; 31771-72; 31809-818; 31820 (2 pages); 31822 (2 pages); 31824 (2 pages); 31827 (2 pages); 31831; 31825-894
June 7, 2006	Production Box 9	00014 - 04704



**MILLER & CHEVALIER**  
CHARTERED

655 FIFTEENTH STREET, N.W., SUITE 900  
WASHINGTON, D.C. 20005-5701  
202.626.5800 FAX: 202.628.0858  
WWW.MILLERCHEVALIER.COM

(202) 626-6065

July 28, 2006

**VIA REGULAR MAIL**

Office of the Secretary  
Attn: Rulemaking and Adjudications Staff  
U.S. Nuclear Regulatory Commission  
Mail Stop: 0-16 C1  
Washington, D.C. 20005

Re: **In the Matter of DAVID GEISEN,**  
**Docket No. IA-05-052, ASLBP No. 06-845-01-EA**

Dear Sir/Madam:

Enclosed please find an original and one copy of David Geisen's **Initial Discovery Disclosure** in the above-captioned matter. One additional copy is included; kindly date-stamp and return it in the accompanying self-addressed stamped envelope.

Thank you for your assistance in this matter.

Sincerely,

Lisa Butler  
Legal Assistant

Enclosure (4)