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APPEARANCES:

On Behalf of the Petitioner:

ERIC JOSEPH EPSTEIN, pro se

4100 Hillisdale Road

Harrisburg, Pennsylvania 17112

On Behalf of PPL SUSQUEHANNA LLC:

DAVID R. LEWIS, ESQ.

of: Pillsbury Winthrop Shaw Pittman LLP

2300 N Street, N.W.

Washington, D.C. 20037

(202) 663-8474

FAX 663-8007

BRYAN SNAPP, ESQ.

Counsel, PPL Susquehanna LLC

2 North 9th Street

Allentown, Pennsylvania 18101

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On Behalf of the Nuclear Regulatory Commission:
SUSAN UTTAL, ESQ.
JODY MARTIN, ESQ.
MOLLY BARKMAN, ESQ.
Office of the General Counsel
Mail Stop O-15 D21
Washington, D.C. 20555-0001

ALSO PRESENT:

ALICIA MULLINS
YOIRA DIAZ SANABRIA
JENNIFER DAVIS

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P-R-C-E-E-D-I-N-G-S

5:57 p.m.

1
2
3 JUDGE YOUNG: On the record. My name is
4 Ann Marshall Young. I'm the Chair of the Licensing
5 Board for this proceeding involving the Susquehanna
6 Steam Electric Station license renewal proceeding. I
7 want to first ask the other members of the Board to
8 introduce themselves. I'm the legal member of the
9 Board.

10 Judge Sager.

11 JUDGE SAGER: I'm William W. Sager, S-A-G-
12 E-R. I'm Technical Judge here at ASLBP and also
13 Professor of Geoscience at Texas A&M University.

14 JUDGE LATHROP: I am Dr. Kaye D. Lathrop,
15 L-A-T-H-R-O-P. My field of speciality is Nuclear
16 Engineering and Reactor Safety.

17 JUDGE YOUNG: Could we start with the
18 staff and have you introduce yourselves and anyone
19 else who is with you?

20 MS. UTTAL: This is Susan Uttal, Counsel
21 for the NRC staff. My name is spelled U-T-T-A-L.
22 With me, I have Mr. Jody Martin, M-A-R-T-I-N, who will
23 be arguing some of the contentions today and Molly
24 Barkman, B-A-R-K-M-A-N, who will be also arguing
25 today. I also have several staff members here, but

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1 they will not be entering appearances. So I'm not
2 going to introduce them.

3 JUDGE YOUNG: Why don't we go to you next,
4 Mr. Epstein?

5 MR. EPSTEIN: Well, I'm the only one here.
6 I have a question. I'm just curious as to who the
7 other NRC staff is here, whether it's technical
8 support or what. I'm just trying to get a bit of an
9 idea of what's in play today.

10 JUDGE YOUNG: Why don't you go ahead and
11 introduce the staff members, Ms. Uttal?

12 MS. UTTAL: Okay. I have the two project
13 managers, Alicia Mullins, M-U-L-L-I-N-S, and Yoira
14 Diaz Sanabria. That's Y-O-I-R-A D-I-A-Z S-A-N-A-B-R-
15 I-A and she is the project manager on the safety side
16 and Ms. Mullins is the project manager on the
17 environmental side. Also Jennifer Davis also from the
18 staff.

19 JUDGE YOUNG: Okay. Mr. Lewis.

20 MR. LEWIS: Yes, this is David Lewis from
21 the law firm of Pillsbury Winthrop Shaw Pittman
22 representing PPL Susquehanna and also on the phone at
23 another location is Mr. Bryan Snapp who is with PPL
24 and is responsible for their nuclear legal matters.

25 JUDGE YOUNG: Thank you. This is Judge

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1 Young again and I realize I didn't spell my name.
2 There's no "e" on Ann and it's M-A-R-S-H-A-L-L and
3 Young as in not old.

4 MR. SNAPP: And Bryan Snapp is B-R-Y-A-N,
5 last name Snapp, S-N-A-P-P.

6 JUDGE YOUNG: And if you have any more
7 spelling that you would like to get from us at the
8 end, please feel free for the court reporter and if we
9 start to talk over each other or someone doesn't
10 identify themselves, feel free to interpret and ask us
11 to do right.

12 Okay. Before we get started, I just
13 wanted to say a couple of things. First of all, we
14 appreciate your making yourselves available at this
15 hour. We're having the annual meeting of the Atomic
16 Safety and Licensing Board Panel this week. So we've
17 been meeting and training and I appreciate your
18 availability at this late hour of the day.

19 I'd also like to sort of set the stage for
20 the argument that we'll be hearing from. First, I'd
21 like to touch on the Board's role, authority and
22 jurisdiction because we want the parties to focus on
23 the actual legal standards we are required to follow
24 as independent and impartial judges. Adjudication
25 involves the resolution of disputes based on existing

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1 law and rule which, so to speak, set the parameters
2 for the adjudication function. It's different from
3 legislation, rulemaking or, for example, regulatory
4 enforcement before it gets to the adjudication level.

5 The law that governs our actions in this
6 proceeding include statutes, regulations and case law
7 decisions relating to the standing of the petitioner
8 petitioners, as the case may be, and the admissibility
9 of contentions submitted by petitioners and also in
10 this proceeding, the law governing license renewal,
11 the scope of which has been significantly restricted
12 by the Commission in its rules and case law. There
13 may be other avenues for approximately matters that do
14 not fall within adjudication, generally, within NRC,
15 adjudication specifically, and even more specifically,
16 within NRC adjudication in a license renewal context.

17 All of this relates to the idea that we
18 act under the rule of law and must base our decisions
19 on the law and facts that are relevant under the law
20 without fear or favor or based on an inappropriate
21 influences. This is how the right of all parties to
22 fair adjudication procedures is protected.

23 Now in order of the contentions, we want
24 to hear from you very briefly -- Actually, let me back
25 up. Now we want to hear from you very briefly on the

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1 following matters in order. First, very briefly, we
2 will have just a question or two on standing mainly
3 having to do with the staff and PPL's response to Mr.
4 Epstein's standing based on proximity. Then we'd like
5 to hear from you each very briefly on each contention
6 on how each is or is not within the scope of license
7 renewal under relevant rules and law and how each
8 meets the requirements of the Contention Admissibility
9 Rule at 10 CFR 2.309(f)(1), in particular, the
10 sections on scope and on whether sufficient
11 information has been provided to show a genuine
12 dispute on a material issue of law or fact.

13 A couple of particular questions on
14 certain contentions. On Contention 2, we'd like to
15 hear from the staff if you're able to, if you know,
16 tell us when there might be any notice of the right to
17 a hearing on the pending uprate applications and then
18 on Contention 5, we'd like to get an update from all
19 of the parties to the extent you can provide it on the
20 status of Petitioner Epstein's pending petition for
21 rulemaking. I think you, Mr. Epstein, referred to
22 having filed that on October 19, 2005 and then re-
23 filed it on March 15, 2006.

24 We have the two *Federal Register* denials
25 of the petition for rulemaking that was filed by Mr.

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1 Christian and I believe, Mr. Epstein, you indicate
2 that you were one of the petitioners on that. So
3 we're clear on what happened with the initial petition
4 for rulemaking. We're not clear on the status of this
5 currently pending one and wanted whatever update the
6 parties can provide to us on that when we get to
7 Contention 5.

8 Finally, we would appreciate it if the
9 staff could indicate to us whether and when any public
10 meetings on the staff's safety review and the
11 environmental scoping process will be held in the
12 Susquehanna's license renewal.

13 I want to emphasize that we're going to
14 have to keep to our time limits on each contention.
15 We may interrupt you with questions. I may also sort
16 of step in if you start to go over. As we said in our
17 order of February 28th, we've read your pleadings. So
18 we don't want you to repeat what you've said in the
19 pleadings but really direct your comments to the
20 specific issues that we've laid out for you in that
21 order and the three additional questions that I've
22 just, four, I guess, counting the one on the standing
23 that I've just gone over.

24 Why don't we just start with the standing?
25 Mr. Epstein, in his reply, indicated that he lived, I

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1 think, 56 miles from the plant and worked within the
2 50 mile radius of the plant. The staff and PPL, can
3 you just briefly just give any argument that you have
4 on that? Whichever one wants to go first is fine.

5 MR. LEWIS: Judge, this is David Lewis.
6 I'll go first. I don't believe that Mr. Epstein has
7 demonstrated standing. My recollection of his
8 pleading is that he resides as you said 56 miles away
9 and his place of business is his home. So his regular
10 business address is also more than 50 miles from the
11 plant.

12 His claim to this standing is really that.
13 On occasion, he's in other areas nearer by, but he
14 certainly does not establish sufficient proximity with
15 enough regularity to show the same sort of every day
16 close proximity that's essential to establish a
17 genuine stake in the matter.

18 There are a few cases that have indicated
19 that frequently an area even if you don't reside it
20 may establish standing. But those cases involve
21 situations, for example, where someone lives outside
22 of 50 miles but their regular place of work is a few
23 miles from the plant and, therefore, five days a week,
24 ten hours a day, they're within the shadow of a plant.

25 Mr. Epstein's only statements are that in

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1 January and February he will have three trips that
2 will bring him within 50 miles of the plant, one trip
3 within 45 miles, one trip within 47 miles and one
4 trip, I think he said, within 15. But that's hardly
5 a close, regular, everyday existence of proximity to
6 the plant.

7 JUDGE YOUNG: Can you give me the cases
8 that you're referring to, just the citations?

9 MR. LEWIS: The one case that I -- I don't
10 have the citations with me, but the cases that I do
11 recall that I was involved in was with the Pathfinder
12 decommissioning where a gentleman lived outside the 50
13 mile zone but I believe his work address was about 10
14 miles from the plant and he was there five days a
15 week. In that case, the Board held that it was almost
16 the same amount of proximity that the residents would
17 have.

18 JUDGE YOUNG: This is Judge Young. You
19 said Pathfinder.

20 MR. LEWIS: P-A-T-H-F-I-N-D-E-R. It was
21 a reactor decommissioning proceeding.

22 JUDGE YOUNG: And when was that?

23 MR. LEWIS: Ten years ago maybe.

24 JUDGE YOUNG: Okay.

25 MR. LEWIS: I'm sorry. I don't have the

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1 citation, Judge Young.

2 JUDGE YOUNG: That's okay. Thank you.
3 Did you have anything else you wanted to add briefly?

4 MR. LEWIS: No. That's it, Judge Young.

5 JUDGE YOUNG: Ms. Uttal or whoever of the
6 staff lawyers, wants to speak to this.

7 MR. MARTIN: This is Jody Martin from the
8 staff. J-O-D-Y Martin, for the court reporter. The
9 staff also does not believe that Mr. Epstein has
10 satisfied the proximity principle in this case. Some
11 of the earlier cases have shown that the type of
12 contact needed within the proximity are akin to the
13 type of contact that residency usually provides and
14 the courts, the Commission, has to have generally
15 enough to see that there is everyday activity that's
16 in the proximity zone or also enough to see if there
17 is some sort of contact with the main. For instance,
18 in the prior fuel storage case which is 49 NRC 318, it
19 was mainly the petitioner in that case had various
20 zone contacts with the main itself. He fished there.
21 He went and looked at nature there.

22 Also the Commission has often said that
23 there needs to be very specific instances provided and
24 they have to be frequent enough that they show a
25 likelihood of an ongoing connection and presence and

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1 we don't think that his two or three contacts listed
2 rises to the level that the Commission has asked for
3 in order to satisfy this proximity.

4 JUDGE YOUNG: Okay. Mr. Epstein, do you
5 know of any case law on the standing issue, the
6 proximity presumption that we're talking about here?

7 MR. EPSTEIN: I think the proximity
8 normally defers to somebody who lives or works within
9 the 50 miles of the plant. I think --

10 JUDGE YOUNG: Mr. Epstein, I'm going to
11 interrupt you. I'll do this with everyone.

12 MR. EPSTEIN: Yes.

13 JUDGE YOUNG: But what I'm asking is do
14 you know of any actual cases, published legal
15 decisions on the subject?

16 MR. EPSTEIN: Yes.

17 JUDGE YOUNG: Okay. Can you give me
18 those?

19 MR. EPSTEIN: I don't have them now, but
20 I can certainly get them to you.

21 JUDGE YOUNG: Okay. Why I don't I ask all
22 the parties to do this and that is by Monday morning
23 to file just citations to cases that you'd like us to
24 look at giving the citation and the specific page
25 numbers and we'll take all those into consideration

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1 when we rule on standing.

2 MR. EPSTEIN: Judge Young, am I allowed to
3 comment?

4 JUDGE YOUNG: I really want to try to
5 focus this very precisely. We have read all your
6 filings and I may let you have about a minute on this.

7 MR. EPSTEIN: That's all I need.

8 JUDGE YOUNG: We're pretty clear in our
9 minds about the questions that we would like to have
10 answered and since we have a limited amount of time we
11 want to try to keep people focused. So go ahead and
12 take a minute.

13 MR. EPSTEIN: Sure. I'll take one minute.
14 I think my work has been mischaracterized. I'm based
15 at my house and for the last eight years, the trips
16 that I make are between four to six trips weekly to
17 the area. I gave you a snapshot so you would have
18 some idea. The office is the Sustainable Energy Fund
19 in Allentown and that's been going for eight years and
20 will continue. So I'm there on a weekly level either
21 in Hazelton or Allentown, No. 1.

22 Also the logic disturbs me because you
23 could live one foot from a nuclear power plant, but if
24 you were a trucker or itinerant salesman and were away
25 all the time, this kind of logic could probably

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1 disrupt your standing as well. So I want to leave it
2 at that. I'll supply the citations. Suffice it to
3 say, I'm in and around the area quite frequently.

4 JUDGE YOUNG: You said Allentown or
5 Hazelton?

6 MR. EPSTEIN: Yes.

7 JUDGE YOUNG: And tell me the name of the
8 organization again that you go to in Allentown.

9 MR. EPSTEIN: The Sustainable Energy Fund.

10 JUDGE YOUNG: Okay. Thank you.

11 MR. EPSTEIN: We're based on Postal Road
12 in Allentown and established in 2000.

13 JUDGE YOUNG: Okay. Thank you very much.
14 We'll look forward to getting that from all of you.

15 All right. On Contention 1, we'd like to
16 ask you to focus here on the license transfer
17 proceeding or the restructuring proceeding. We do
18 have the *Federal Register* notices of opportunity for
19 hearings with regard to those and from what we're able
20 to tell no hearing was requested in those cases. So
21 I guess let's start with you, Mr. Epstein. Were you
22 aware of those proceedings?

23 MR. EPSTEIN: I was engaged in a parallel
24 proceeding at the Public Utility Commission. So I had
25 made a decision not to intervene in that particular

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1 proceeding. In my experience with direct and indirect
2 license transfers, it demonstrated that there's really
3 limited recourse to examine the company's financials.
4 So I was aware and opted to intervene actually on a
5 number of fronts at the Pennsylvania Public Utility
6 Commission relating to the IRS status of the company,
7 the exemption wholesale generator status of the
8 company and the transfer of assets of the company.

9 JUDGE YOUNG: If you could just briefly
10 address the issues that we listed in our order,
11 namely, how this contention would fall within the
12 scope of license renewal and, namely, really the
13 simplest way, I guess, to look at that is is there a
14 Category 2 environmental issue or is there an aging
15 issue that this related to because those are the
16 parameters that are set in this type of proceeding,
17 namely, an adjudication on license renewal.

18 MR. EPSTEIN: Yes and it's an inexact and
19 imprecise connection and I'm aware of that. The
20 concern is that you have a, what I believe to be,
21 relatively new licensee applying for a license and the
22 issue for me is that this is much different than the
23 original company. This is a limited liability
24 company.

25 JUDGE YOUNG: Okay. I'm going to

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1 interrupt you again, Mr. Epstein. I'm sorry. I
2 appreciate --

3 MR. EPSTEIN: I'm going to give you the
4 NRC -- Can you just give me one second?

5 JUDGE YOUNG: Okay. What I want you to
6 address is the 10 CFR 2.309(f)(1), the six
7 requirements under that, and most specifically, the
8 scope in No. 3 and the sufficient information to show
9 a genuine dispute on a material issue, No. 6, and then
10 whether there's a category 2 issue, environmental
11 issue, or an aging issue under the scope of license
12 renewal, if you could focus your remarks on those.

13 MR. EPSTEIN: My reference, and if it's
14 not congruent to your request please tell me, is I was
15 under the impression that the Commission's basis for
16 establishing the 20 year limit contained in Section
17 5417(c) as discussed in the 91 statements of
18 consideration Part 54 10 CFR that the limit was
19 established to ensure that a substantial operating
20 experience was accumulated by a licensee before
21 renewal application is submitted such that any plant
22 specific concerns regarding aging would be disclosed.
23 The issue for me is that this is a new licensee asking
24 for a license extension and I don't know what exact
25 category that would fit into.

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1 JUDGE YOUNG: Do you want to just very
2 quickly in the remaining time you have address what
3 the staff and PPL pointed out about the Commission
4 already having approved the transfer and the
5 restructuring and how that does not create a new
6 license but the new license C takes on the original
7 license with the same terms?

8 MR. EPSTEIN: Yes, I saw that and I
9 appreciate the opportunity. Again, obviously I
10 acknowledge that some kind of transfer took place and
11 I was unsure as to the exact mechanism that was used.
12 The concern that I have and in past was normally when
13 a license or indirect license transfer occurs is you
14 don't look at the financials. Basically, you just get
15 a score card of players and then those players are
16 transferred to the new company.

17 My concern is that in every other venue
18 I've been in regarding this company, they basically
19 attest to the fact that they're a new company with
20 really no legacy relationship to the previous company
21 and if that's the fact and all I'm arguing then is
22 this appears to be a new company, though they got the
23 license asking for a license extension. That's
24 essentially it in a nutshell.

25 I don't agree with the staff that there's

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1 an intermediary parent in the form of --

2 JUDGE YOUNG: Okay. I think you've
3 already told us a lot of this in your pleadings.

4 MR. EPSTEIN: Yes.

5 JUDGE YOUNG: And again, I want to focus
6 on, if you can, in the last 30 seconds tell me is
7 there an aging issue very concisely, five or ten
8 words, and is there a category 2 environmental issue.

9 MR. EPSTEIN: I believe there is. I
10 believe that you have a new corporation asking for a
11 license extension without the requisite experience.

12 JUDGE YOUNG: Okay. Let's move on to Mr.
13 Lewis. Do you have anything to add that you haven't
14 already told us?

15 MR. LEWIS: Yes, just very briefly. Mr.
16 Epstein's contention is that "the company failed to
17 provide data necessary to determine its ability to
18 maintain and service its financial obligations."
19 That's the wording of his contention. This has
20 nothing to do with whether the company has sufficient
21 operating experience. Clearly, his contention is on
22 financial qualifications and clearly, it's barred by
23 the NRC rules. Specifically, 10 CFR 50.33(f)(2)
24 states that financial qualifications information does
25 not have to provide in connection with license renewal

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1 and we also provided the citation to the rulemaking
2 which specifically excluded that issue from license
3 renewal.

4 With respect to the operating experience
5 though, of course, the plant itself has more than 20
6 years operating experience and while the plant was
7 transferred to a generating company, it's the same
8 plant staff and they have plenty of operating
9 experience, but that's not even within the scope of
10 Mr. Epstein's contention.

11 Finally, we also, in our response,
12 provided the citation and including the ADAMS number
13 to the safety evaluation report that was issued at the
14 time of license transfer to PPL Susquehanna and it did
15 indeed look at the company's financial qualifications
16 as a non-electrical utility. So in addition to being
17 without site scope, there's clearly no basis to this
18 contention.

19 JUDGE YOUNG: Thank you. Ms. Uttal or --
20 When we go to the staff, I'll say Ms. Uttal and then
21 if you want to designate one of the other lawyers for
22 the staff, that's fine.

23 MR. MARTIN: This is Jody Martin again
24 from the staff. Again, I would just like to reiterate
25 that the Commission did in its decision of rulemaking,

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1 69 *Federal Register* 4439 specifically remove financial
2 qualifications from license renewal as Mr. Lewis just
3 stated and also in the safety evaluation for the
4 license transfer, Section 2 of that safety evaluation
5 specifically refers to the financials of the license
6 transfer and Section 3 specifically looks at the
7 decommissioning funding for that license transfer. So
8 the NRC did deal with that at that time.

9 JUDGE YOUNG: Okay. And again, I'll just
10 repeat. We don't need to hear anybody reiterate
11 anything. We appreciate it, but for all of you, we're
12 really wanting to try to focus on anything that hasn't
13 already been written and submitted to us.

14 MR. MARTIN: Okay. That's all.

15 JUDGE YOUNG: Okay. Thank you very much.
16 All right. Then moving to Contention 2, there is the
17 pending update proceeding. To our knowledge, there
18 hasn't been a *Federal Register* notice on that. Can
19 the staff give us an update on what there is out
20 there? Is there anything we can expect on that just
21 for our information since that has come out?

22 MS. UTTAL: Judge, this is Susan Uttal.
23 My information is that it should be going out very
24 shortly. I can't give you an exact date but it should
25 be very soon.

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1 JUDGE YOUNG: And that would include
2 within it the notice of opportunity to petition for a
3 hearing.

4 MS. UTTAL: That's correct.

5 JUDGE YOUNG: Thank you. I'm not -- I
6 guess on Contention 2 as well there is the issue of
7 the motion to strike and I'll just say that while we
8 don't strike things from the record in the sense of
9 taking them out the record, everything stays in the
10 record. There is case law that says that while you
11 can provide legitimate amplification in reply, you
12 can't introduce new subjects.

13 I guess the questions that it would be
14 helpful to have you, Mr. Epstein, address here would
15 be just to point us to a page and a line where you
16 addressed the four things mentioned in Mr. Lewis'
17 motion on the last page, namely, (1) aging management;
18 (2) inspection of systems and components that contain
19 radioactively contaminated water; primarily those two,
20 also (3) monitoring for leakage; and (4) a tritium
21 action plan. Could you just --

22 MR. EPSTEIN: I think I pointed that out
23 in my reply brief. I think in the first three points
24 that were raised they probably were not specifically
25 a part of the contention because I didn't have access

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1 to that information until after the brief was filed.
2 I was able to get the information on some of the
3 challenges of leaking pipes in another proceeding. So
4 frankly, I didn't have access to the information and
5 it wasn't disclosed.

6 On the tritium, that's been a consistent
7 threat --

8 JUDGE YOUNG: Hold on. Before you move
9 onto the next thing, let's just try to pin that down.
10 You said that you didn't have access to it. What do
11 you mean by that? What information did you become
12 aware of later that you were not aware of earlier?

13 MR. EPSTEIN: Right. On December 20,
14 2006, the company filed a water use permit with the
15 Susquehanna River Basin Commission.

16 JUDGE YOUNG: December what?

17 MR. EPSTEIN: Twentieth 2006 and I was
18 only able to obtain it in January and I think I made
19 a copy of that available. I'm more than happy to do
20 that again, but in the company's request to extract
21 more water from the Susquehanna River, they disclosed
22 that they had problems with some leaking pipes at the
23 Susquehanna Nuclear Power Plant. So I was clearly at
24 a disadvantage as the information was not in the LRA
25 but came a part through actually investigating another

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1 related regulatory request.

2 JUDGE YOUNG: And what information in that
3 specifically is related to which of the issues that
4 are listed here?

5 MR. EPSTEIN: I'm not sure I understand
6 the question, but I think that what I've raised was
7 the fact that Susquehanna or PPL Susquehanna disclosed
8 that they were unable to accurately monitor water flow
9 due to the corrosion of pipes. That seems to me to be
10 an aging problem that should be investigated or
11 evaluated prior to issuing relicensing or an
12 extension.

13 JUDGE YOUNG: All right. You got the
14 information on December 20th. When --

15 MR. EPSTEIN: No. It was filed on
16 December 20th. I got the information after the filing
17 deadline, January 2nd. I did not have access to the
18 information or it would have been in my initial
19 complaint.

20 JUDGE YOUNG: When did you get it and how
21 did you get?

22 MR. EPSTEIN: I can get you the exact
23 date. It was sometime in January when I actually went
24 down to the Susquehanna River Basin Commission and
25 looked at the filing.

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1 JUDGE YOUNG: Okay. So you're saying that
2 that relates to, of the four issues, aging management,
3 inspection of systems and components, monitoring for
4 leakage, tritium action plans. Which of those?

5 MR. EPSTEIN: The first three. This is
6 the major -- This was a major piece of information
7 that I didn't have which indicates that there's an
8 aging problem with water monitoring at Susquehanna.
9 The other issues I raised in my petition had to do
10 with water resource management in Pennsylvania,
11 aquatic challenges, zebra mussels, Asiatic clams and
12 also tritium monitoring and I think the company and
13 perhaps I was at fault for raising my concerns to the
14 questions rather than in direct interrogatories.

15 JUDGE YOUNG: Let's move to Mr. Lewis.
16 Can you address Mr. Epstein's reference to the
17 information he received in January?

18 MR. LEWIS: Absolutely. And it has
19 nothing to do with any piece of equipment that's
20 within the scope of license renewal. I'm sorry. This
21 is David Lewis speaking. The equipment that's being
22 referred to is the intake pipe on the river. The
23 issue that was being addressed is that there are
24 deposits inside this pipe. It's not leakage from this
25 pipe. It's deposits inside the pipe that make the

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1 diameter smaller and as a result there are some
2 flowmeters that no longer are accurately calibrated.
3 So the issue that's being addressed was simply that in
4 connection with this water permit. We may need to
5 replace this pipe or somehow accurately recalibrate
6 the flowmeters to represent how much water is flowing
7 through the intake.

8 It has nothing to do with any leakage of
9 any water from the plant and it's not a component
10 that's within the scope of license renewal. It's not
11 a safety related component. And it's not component
12 that relates to any of the other categories of
13 systems, structures and components that are defined in
14 10 CFR 54.4 as being within the scope of the rule.

15 JUDGE YOUNG: Thank you. The staff.

16 MS. BARKMAN: This is Molly Barkman for
17 the staff. We agree with everything Mr. Lewis just
18 said and would also say that if Mr. Epstein thought
19 that he had found some newer information here he
20 should have filed a motion to amend his petition and
21 file a late file petition and meet the requirements
22 for that under 2309.

23 JUDGE YOUNG: Thank you. Mr. Epstein, I'm
24 going to give you just a couple of minutes to respond
25 to what Mr. Lewis and Ms. Barkman, did I get the name

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1 right, said. This is Judge Young again. I'm sorry.
2 And also if you could tell me where in the rules this
3 would fall within the structures, components, that
4 would subject to the aging management and also under
5 what Category 2 issue your Contention 2 would fall as
6 an environmental issue. Did that make sense?

7 MR. EPSTEIN: Yes, it make sense and I
8 understand what Mr. Lewis was saying. It is germane
9 to this proceeding. Whether you call it leaking or
10 corrosion or whatever you want to call, it's a major
11 issue because in order to be uprated or relicensed
12 they have to increase the amount of water flow they
13 use and what they reported -- and they didn't report
14 it to. I found this through happenstance.

15 This is information that I think should
16 have been provided. What we found is they can't
17 accurately gauge how much water they're using. That's
18 because their equipment isn't working. Maybe it's not
19 a leak. Maybe it's just corrosion. Whatever it is,
20 they can't report with degree of accuracy. This is
21 huge because this deals with water consumption issues
22 and I think it directly relates to 2.3, plant
23 interaction with the environment and --

24 JUDGE YOUNG: I'm sorry. 2.3 of what?

25 MR. EPSTEIN: I'm just operating out of

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1 NUREG 1437 Volume 1.

2 JUDGE YOUNG: Now 2.3 of what though? Of
3 new --

4 MR. EPSTEIN: Of the NUREG --

5 JUDGE YOUNG: Section 2.3?

6 MR. EPSTEIN: Yes. Section 2.3, plant
7 interaction with the environment.

8 JUDGE YOUNG: And tell me the NUREG number
9 again.

10 MR. EPSTEIN: It's NUREG 1437 Volume 1.

11 JUDGE YOUNG: Okay. And then just quickly
12 after you finish your sentence on that, what I'd like
13 you to do since it sounds like you really are talking
14 about an environmental issue here is to point me to
15 the category 2 issue in Appendix B to 10 CFR Part 51
16 Subpart A I believe that it is.

17 MR. EPSTEIN: Yes. I don't have that with
18 me, but I can supply that to you by Monday. When you
19 said the category 2 Appendix B, I don't have that in
20 my notes right now at my disposal.

21 JUDGE YOUNG: Okay. If you want to just
22 in addition to the citations you will provide.

23 MR. EPSTEIN: Sure.

24 JUDGE YOUNG: What I want to caution you
25 about though is all I want is just a quotation of the

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1 category 2 category that you are saying this fits
2 within. I don't want to have more written argument.
3 Just simply a listing of the category items in the
4 table.

5 MR. EPSTEIN: I understand you want the
6 citation and the reference.

7 JUDGE YOUNG: Okay. Thanks very much.

8 MR. EPSTEIN: Yes.

9 JUDGE YOUNG: Go ahead.

10 MR. EPSTEIN: I would just conclude by
11 saying perhaps the NRC staff is correct about
12 logistically what should have occurred. But I think
13 there's a responsibility on behalf of the company to
14 disclose this information. Now Mr. Lewis may not
15 think it's relevant I happen to think it has a great
16 deal of relevance on how the company behaves with the
17 local community, local resources and whether or not
18 the company is even going garner support for
19 additional water use. So frankly, I take exception to
20 the NRC and the company and vigorously pursuing
21 Contention 2.

22 JUDGE YOUNG: And again, just provide us
23 with the category 2 item that you are arguing that
24 this falls under and I would refer back to the things
25 I said in the beginning about the scope and parameters

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1 of what is involved in adjudication. Anything else on
2 Contention 2?

3 MR. LEWIS: Judge, this is Mr. Lewis. Let
4 me just respond to what Mr. Epstein said. First of
5 all, this whole issue about the intake pipe was not
6 part of his original contention and so while he may
7 provide a citation, the staff is right. If he wanted
8 to amend his contention to change the focus, he should
9 have filed an amendment then and justified it.

10 With respect to the allegation that we've
11 hidden something is preposterous. Section 3.1.2.1 of
12 our environmental report reflects the fact that with
13 uprated conditions we will have to change the approval
14 that we need with respect to the maximum amount of
15 water that we would be consuming. So the application
16 clearly reported how much additional water the draw
17 would be under uprated conditions and in addition
18 reflected the fact that there would be a need to go to
19 the Savannah River Basin Commission to obtain their
20 approval. But the only point that one covered is the
21 time that application had not been filed. But the
22 fact that it was needed was clearly identified.

23 JUDGE YOUNG: Okay. Anything else on
24 Contention 2? Then let's move to Contention 3. Let's
25 see. In Contention 3, I guess I would ask that you

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1 focus on -- Again, Mr. Epstein, you're sort of at a
2 disadvantage by not having the rule on the scope of
3 environmental issues in license renewal with you
4 because that's what governs how we make our decision
5 and the section is 10 CFR Section 51.53 (c)(3)(ii) I
6 believe and then under that, there are various
7 references to the subjects that are admissible as
8 contentions in license renewal cases and then that's
9 followed by Subpart A, Appendix B, Table B-1 and each
10 item or subject is designated as being category 1 or
11 category 2 and if it's category 1, it's not
12 admissible. If it's category 2, then it may be
13 admissible. At least, it would be within the scope.

14 So the question that I have for you which
15 it sounds like you're not going to be able to answer
16 it today is which category 2 issue this Contention 3
17 falls under.

18 MR. EPSTEIN: I will provide that citation
19 for Monday. My notes were prepared unfortunately
20 using the Generic Environmental Impact Statement for
21 License Renewal, the NUREG 1437 Volume 1 and my
22 preparation for this contention is just going to be
23 2.3.8, socio-economic factors.

24 JUDGE YOUNG: You're talking about the
25 Generic Environmental Impact Statement?

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1 MR. EPSTEIN: Yes, ma'am.

2 JUDGE YOUNG: I'll think you'll probably
3 find that the issues in the Generic Environmental
4 Impact Statement are probably all going to be category
5 1 issues which are not admissible because the
6 Commission has dealt with them generically. But go
7 ahead and provide to us, obviously with copies to
8 everyone, any category 2 issue that you would argue
9 the contention falls under.

10 MR. EPSTEIN: And I understand that most
11 of these may be category 1 and the point I'm trying to
12 make during this proceeding is that one size does not
13 fit all. You have an interesting situation. The cite
14 and I'll read it quickly for you is there's an
15 assumption that nuclear power plants represent an
16 investment that's substantial and the mere presence of
17 a plant would essentially drive down taxing ratios for
18 other folks.

19 Is this a category 1? Probably. The
20 problem I'm having throughout this proceeding is that
21 one size doesn't fit all and that's what I was trying
22 to raise that you have a risk/reward formula when it
23 comes to utilities. Where if you have the risk of
24 having the plant, you're usually rewarded with some
25 economic benefits.

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1 I'm arguing just the opposite is occurring
2 and I'm frustrated because I'm not sure that it can be
3 easily diced into a category 2 proposal.

4 MR. LEWIS: Judge, this is Mr. Lewis. I'm
5 concerned about giving Mr. Epstein a fourth bite at
6 the apple to explain why his contentions are relevant.
7 He had the obligation to do so in his original
8 petition. He had the ability to do so in his reply.
9 He's had the opportunity to do so tonight. Every time
10 we've seen a pleading from Mr. Epstein the focus
11 shifts. So I'm very concerned that on Monday we're
12 going to see some brand new explanation that we'll
13 have no way to respond to and I believe that the
14 appropriate time to explain the relevance was in the
15 original petition. So I'm quite concerned about the
16 fairness of giving him a fourth bite at the apple.

17 JUDGE YOUNG: I understand what you're
18 saying and that's why I think we're limiting this to
19 merely citations and we're not going to accept any
20 more argument and, Mr. Epstein, I guess when the
21 transcript of this conference is placed in ADAMS, I
22 encourage you to look at it and go back and read my
23 introductory remarks about the nature of adjudication
24 and what the scope of adjudication is, what are the
25 parameters of it, what is our jurisdiction and why

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1 that's important for protecting the fairness of the
2 proceeding for all parties. We're certainly not
3 allowed to lean in one direction or the other in favor
4 of a party. We're bound by the legal requirements.

5 So let's move on.

6 MR. EPSTEIN: Judge, I don't disagree and
7 I'm more than willing to waive submitting anything to
8 you on Monday frankly. I'm perfectly content with the
9 material I've submitted. I don't need a third or
10 fourth bite.

11 JUDGE YOUNG: You may do as you choose.
12 We'll take into account any citations by any parties
13 provided to us on Monday.

14 MR. EPSTEIN: Sure.

15 JUDGE YOUNG: Let me just move now. Mr.
16 Lewis, did you have anything very briefly to say on
17 Contention 3?

18 MR. LEWIS: No, I think I'll rest on our
19 pleadings. I mean this is a technical qualifications
20 issue that's just clearly outside the scope of the
21 proceeding.

22 JUDGE YOUNG: Thank you. And the staff.

23 MR. MARTIN: This is Jody Martin again.
24 No, we have nothing further to add beyond what's in
25 our pleadings.

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1 JUDGE YOUNG: Okay. Thank you very much
2 and, Mr. Epstein, on Contention 4, I believe that you
3 made reference to various sections of the
4 environmental report and I guess my same question for
5 you here was what category 2 does it fall under and I
6 don't imagine that you're going to be able to answer
7 that based on what's happened in the first three
8 contentions. So I guess the same would apply to that.

9 Do you have anything that you would like
10 to say just briefly in response to it that you haven't
11 submitted in writing?

12 MR. EPSTEIN: No, I'm comfortable with my
13 pleading.

14 JUDGE YOUNG: Okay. Thank you. Mr.
15 Lewis?

16 MR. LEWIS: No, under those circumstances
17 we responded already, too.

18 JUDGE YOUNG: And the staff?

19 MR. MARTIN: Jody Martin. No, we don't
20 have anything further to add.

21 JUDGE YOUNG: Thank you very much. All
22 right. Then on Contention 5, I guess the same
23 questions apply here. What would bring this within
24 the scope? But we did also have the questions for any
25 of you if you could just for informational purposes

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1 let us know what, if anything, you know about the
2 pending rulemaking, whether anything has happened or
3 is expected to happen.

4 MR. LEWIS: Judge Young.

5 JUDGE YOUNG: Yes.

6 MR. LEWIS: This is Mr. Lewis. There was
7 a *Federal Register* notice on Monday, March 5th, 72
8 *Federal Register* 9708 which denied the petition for
9 rulemaking.

10 JUDGE YOUNG: Thank you very much. Anyone
11 have anything to add to that?

12 MR. EPSTEIN: The only thing I would add
13 is that if you look at the comments and the
14 justification for denial, they indicate the two issues
15 were taken into strong consideration, Senate Bill 922,
16 and the fact that another licensee, Exelon, had
17 trainings for daycare and nursery school. On both
18 instances, PPL has not an emergency plan and
19 incorporated SB 922 nor have they had a training to
20 that population and that also was something you can
21 get right off the net when you look at the *Federal*
22 *Register* decision.

23 JUDGE YOUNG: Now on this one also, based
24 on the last thing you filed, Mr. Epstein, I understand
25 that the same basic issues are now pending in some

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1 form before the Department of Homeland Security. Is
2 that correct?

3 MR. EPSTEIN: Yes, ma'am.

4 JUDGE YOUNG: Okay. Thank you. Anything
5 further on Contention 5?

6 MR. EPSTEIN: No, ma'am. I rest on my
7 pleading.

8 JUDGE YOUNG: Mr. Lewis?

9 MR. LEWIS: Contention 5 goes to emergency
10 planning and it's clearly outside the scope and we've
11 addressed that adequately. I just would like to
12 respond with respect to Mr. Epstein's suggestion that
13 PPL has done nothing on daycare. He's in no position
14 to know that and, in fact, the company has reached out
15 to daycare centers to assist them and complied with
16 the new law. So Mr. Epstein's assertion
17 notwithstanding, there's no basis for his suggestion
18 that these planning obligations are being ignored.

19 MR. EPSTEIN: I'm just going on the
20 comments that were in the NRC Commission meeting.

21 JUDGE YOUNG: We will look at the Federal
22 Register notice. I think I had probably looked right
23 before that came out. So it's certainly timely in any
24 event.

25 Does the staff have anything to add on

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1 Contention 5?

2 MS. BARKMAN: This is Molly Barkman. No,
3 the staff will rest on its pleadings.

4 JUDGE YOUNG: Well, this has certainly
5 been -- I don't know whether it's due to your
6 participation, Mr. Epstein, not being a lawyer, but
7 this has certainly been brief and concise and to the
8 point and we appreciate again all of you taking the
9 time at this late hour to answer a few questions that
10 we had and talk with us a little bit on these issues
11 that are now pending before us. We will endeavor to
12 get rulings on these matters to you as quickly as
13 possible.

14 Does any party have anything that we may
15 have overlooked before we go off the record?

16 MR. EPSTEIN: Just I need to know close of
17 business Monday would be what time, Judge?

18 JUDGE YOUNG: Actually, I think I said
19 Monday morning.

20 MR. EPSTEIN: Okay.

21 JUDGE YOUNG: But we'll say 5:00 p.m. on
22 Monday.

23 MR. EPSTEIN: No. Again, to assuage any
24 concerns that the staff or PPL has, I may in fact not
25 submit anything because I certainly don't want to be

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1 made out to appear as looking for a third and fourth
2 bite of the apple. I'm completely satisfied with the
3 pleadings to date.

4 JUDGE YOUNG: That's up to you.

5 MR. EPSTEIN: Yes.

6 JUDGE YOUNG: Any citations that any
7 parties want to provide to any regulations or case law
8 or other law that would be fine to provide
9 electronically, file also with the Office of the
10 Secretary, on Monday morning. Thank you very much and
11 that will close this session. Off the record.

12 (Whereupon, at 6:47 p.m., the above-
13 entitled matter was concluded to reconvene.)

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CERTIFICATE

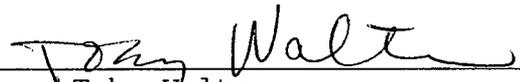
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Name of Proceeding: PPL Susquehanna LLC

Docket Number: 50-387/388-LR

Location: (Telephone conference)

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