

LAW OFFICES
CONNER, MOORE & CORBER

1747 PENNSYLVANIA AVENUE, N.W.
 WASHINGTON, D. C. 20006

TROY B. CONNER, JR.
 ARCH A. MOORE, JR.
 ROBERT J. CORBER
 MARK J. WETTERHAHN
 DONALD J. BALSLEY, JR.
 ROBERT M. RADER
 KEITH H. ELLIS
 NOT ADMITTED IN D.C.

April 2, 1979
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Gary L. Milhollin, Esq.
 Chairman, Atomic Safety
 and Licensing Board
 1815 Jefferson Street
 Madison, Wisconsin 53711

Mr. Lester Kornblith, Jr.
 Member, Atomic Safety and
 Licensing Board Panel
 U.S. Nuclear Regulatory
 Commission
 Washington, D.C. 20555

Dr. James C. Lamb, III
 Member, Atomic Safety and
 Licensing Board Panel
 313 Woodhaven Road
 Chapel Hill, N.C. 27514

In the Matter of
 Public Service Electric and Gas Company, et al.
 (Salem Nuclear Generating Station, Unit 1)
 Docket No. 50-272

Gentlemen:

In accordance with the schedule established at the March 15, 1979 prehearing conference in the captioned proceeding (Tr. 149-50), this letter will serve to fulfill the requirements established by the Atomic Safety and Licensing Board for the identification of written testimony to be filed, and the proposed order of proof.

As stated at the prehearing conference, the Licensee's evidence will consist of the application for amendment of the operating license to increase the storage capacity of the spent fuel pool, as amended and supplemented. These documents have been previously served upon the Board and parties. Specifically, this material consists of the following:

1. Application dated November 18, 1977
 (cover letter only)
2. License change request dated December 13, 1977
3. Amendment 1 to the application dated February 14, 1978

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4. Response to NRC questions dated May 17, 1978
5. Response to NRC questions dated July 31, 1978
6. Response to NRC questions dated August 22, 1978
7. Response to NRC questions dated October 13, 1978
8. Response to NRC questions dated October 31, 1978
9. Response to NRC questions dated November 20, 1978
10. Additional information in support of application dated December 22, 1979
11. Additional information in support of application dated January 4, 1979
12. Affidavit and proprietary document, "Fuel Storage Racks Corrosion Program, Boral-Stainless Steel" dated January 10, 1979

Copies of the proprietary document identified in Item 12 have been provided only to the Board and the Public Advocate.

With regard to the order of proof, Licensee would suggest an order which has been used previously in other licensing proceedings. The Licensee would qualify its witness panel, present its direct case, as outlined above, followed by the NRC Staff's presentation of its safety evaluation and environmental impact appraisal.

Thereafter, for each individual contention, (with Contention 9 of the Colemans and Contention 1 of Lower Alloways Creek considered together) the Licensee would present any additional direct testimony and make its witness panel available for cross-examination by the parties and participants, in turn. Any redirect examination would

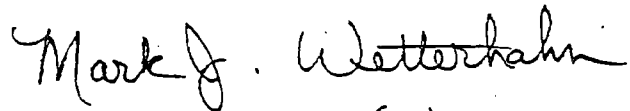
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follow. The examination of the Staff and any witnesses of the party whose contention is being heard would proceed in a similar manner. After all contentions had been considered, rebuttal evidence would be heard.

While the particular order of consideration of the contentions does not appear critical, Licensee would suggest that the Coleman's Contention 2 and 6 be considered first. Following that, Contention 9 of the Colemans and Contention 1 of LACT would be considered together, followed by the Colemans Contention 13 and finally LACT Contention 3.

Attached are the professional qualifications of Mr. John H. Riddle and Mr. Thomas G. Eckhart who in addition to Messrs. Liden and Douglas, whose qualifications were attached to the Licensee's Motion for Summary Disposition, we anticipate will form the Licensee's basic witness panel. As discussed at the prehearing conference, the final makeup of the witness panel will be determined after the Board ruling on the pending motion for summary disposition.

Sincerely,



Mark J. Wetterhahn (sd)
Counsel for the Licensee

cc: Chairman, Atomic Safety and
Licensing Appeal Board Panel
Chairman, Atomic Safety and
Licensing Board Panel
Barry Smith, Esq.
Mark L. First, Esq.
Richard Fryling, Jr., Esq.
R. William Potter, Esq.
Sandra T. Ayres, Esq.
Mr. Alfred C. Coleman, Jr.
Mrs. Eleanor G. Coleman
Carl Valore, Jr., Esq.
Office of the Secretary
June D. MacArtor, Esq.

Enclosures

JOHN H. RIDDLE

Manager, Mechanical Engineering, Storage Engineering Services
Reprocessing and Field Services Department

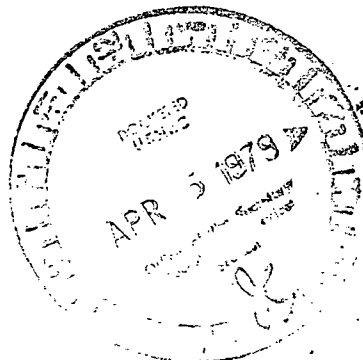
B. Tech. Aeronautical Engineering, University of Loughborough,
Leicestershire, England, 1962.

Mr. Riddle joined Exxon Nuclear Company, Inc., in 1976. He is responsible for all mechanical and structural design and analysis work within the Storage Engineering Services Section.

Mr. Riddle began his career in 1962 as a structural analyst in the aeronautical industry in England. In 1964 he joined British Nuclear Design and Construction. During his two years with BNDC, he was responsible for design and analysis of the reactor vessel for the Wylfa gas cooled nuclear power plant and prepared the conceptual design for the reactor vessel for the Hartlepool plant.

In 1966 Mr. Riddle emigrated to the U.S.A. and joined the General Atomic Company in San Diego, California. He stayed with General Atomic until early 1976 during which time he held a variety of engineering and project management positions. Early assignments included design, analysis and research and development work on the prestressed concrete reactor vessel for the Fort St. Vrain power plant and conceptual design work on the large commercial HTR. He later became section leader of the PCRV liner design group with supervisory responsibility of up to ten engineers and six designers. Mr. Riddle's most recent assignments at General Atomic were in the project management area where he was responsible for pre-construction planning and construction contracting and was program manager for Architect/Engineer study work.

RELATED CORR. SET. 1001 ON



THOMAS G. ECKHART

Senior Nuclear Engineer, Storage Engineering Services
Reprocessing and Field Services Department

Mr. Eckhart joined Laxco Nuclear Company in 1976. He currently is responsible for coordinating the licensing, criticality analysis and marketing aspects for fuel storage rack projects.

While with Laxco Nuclear Company, he has also been responsible for coordinating the contractual, design, fabrication, licensing and installation phases of spent fuel racks.

Mr. Eckhart began his career in 1965 as an engineering and reactor supervisor aboard the nuclear ship Savannah. After serving three years aboard the Savannah, Mr. Eckhart joined the Westinghouse Electric Corporation in 1969 as a Nuclear Fuels Design Engineer. During his three and one-half years with Westinghouse, he performed reload core analysis for Westinghouse P.W.R.'s. In addition to developing models for incorporating uranium/gadolinium fuel into P.W.R. reactors, he coordinated several R&D programs related to operating fuel performance and performed detailed fuel management studies to establish physics limitations for fuel cycle optimization.

In 1973, Mr. Eckhart joined the Portland General Electric Company as a Nuclear Fuels Engineer with responsibility for developing computer models to simulate the operation of the Trojan Nuclear Reactor. He was also responsible for many aspects of fuels planning and power supply planning.

RELATED CORRESPONDENCE

