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Kenneth W. Mateer Business Address:	Secretary 1901 Avenue of the Stars Los Angeles, CA 90067 (213) 277-3311
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Marco S. Mayo Business Address:	Assistant Secretary 1901 Avenue of the Stars Los Angeles, CA 90067 (213) 277-3311

For those persons identified above where the home address is not listed, the home address is unknown and if they are necessary they will be furnished at a later date.

INTERROGATORY NO. 4: Identify any persons not listed in the answer to Interrogatory Number 1 who have served as officers and directors of NECO since 1975. List present addresses for same.

ANSWER: The former Officers and Directors of NECO that have served since 1975, are as follows:

James N. Neel  
Business Address: 148 Old Taylor Trail  
Goshen, KY 40026  
Home Address: Same as above

Henry E. Singleton  
Business Address: 1901 Avenue of the Stars  
Los Angeles, CA 90067  
(213) 277-3311

Jack H. Hamilton  
Business Address: 3401 Shiloh Road  
Garland, TX 75041  
(214) 271-2561

J. Spencer Letts  
Business Address: United California Bank Bldg.  
Suite 5470  
Los Angeles, CA 90017  
(213) 629-1812

Noah J. Hazel  
Business Address: Unknown  
Home Address: Unknown

Kenneth A. Gablin  
Business Address: 6749 Towne Lane Road  
McLean, VA 22101  
(703) 827-0276  
Home Address: 6749 Towne Lane Road  
McLean, VA 22101  
(703) 827-0276

Harold G. Houlton  
Business Address: 1100 Imperial Drive  
Sarasota, FL 33577  
(813) 366-0704

Themistocles G. Michos  
Business Address:

555 California Street, Suite 4350,  
San Francisco, CA 94111  
(415) 788-4646

Roger S. Merta  
Last Known Business  
Address:

Severson, Werson, Berke & Melchior  
One Embarcadero Center, Suite 2505  
San Francisco, CA 94111  
(415) 398-3344

Home Address:

Unknown

Walter R. Severson  
Last known Business  
Address:

Severson, Werson, Berke & Melchior  
One Embarcadero Center, Suite 2505  
San Francisco, CA 94111  
(415) 398-3344

Home Address:

Unknown

Norman M. Strom  
Business Address:  
Home Address:

Unknown  
Unknown

Reuben W. Askanase  
Business Address:  
Home Address:

Unknown  
Unknown

David Askanase  
Business Address:  
Home Address:

Unknown  
Unknown

James L. Harvey  
Business Address:

7066-A Commerce Circle  
Pleasanton, CA 94566  
(415) 462-3750

Home Address:

Unknown

James H. Leonard  
Business Address:  
Home Address:

Unknown  
Unknown

For those persons identified above where the home address is not listed, the home address is unknown and if they are necessary they will be furnished at a later date.

INTERROGATORY NO. 27: Identify all employees of the Applicant who worked on the facility, their dates of employment, title, and duties and responsibilities while they were so employed at the facility.

ANSWER: The below listed employees are provided as a partial listing for that part of the interrogatory not objected to.

<u>NAME</u>	<u>TITLE</u>	<u>From</u>	<u>To</u>	
Andrew J. Armbrust	Radiological Control and Safety Technician	8/22/77	7/9/79	
"	"	Temp. Functions as RSO	7/9/79	2/20/80
"	"	Asst. Site Manager	2/20/80	Present
Russell P. Moore	RSO	1/5/76	8/17/76	
"	"	Asst. Site Manager	8/17/76	1/1/77
"	"	Site Manager	1/1/77	Present
Vernon D. Apple	Asst. Site Manager	1/1/73	11/1/73	
"	"	Site Manater	11/1/73	11/1/76
Arvil Crase	Manager	1968	8/73	
William A. Jones	Asst. Site Manager	7/29/74	7/15/76	
Frederick P. Beirle	Vice President, Sheffield	3/5/63	During 1968	
Palmer Berry	Radiation Safety Monitor	11/74	11/17/75	
Mark A. Bowen	RC & ST	1/1/77	12/26/77	
"	"	Asst. Site Manager	12/26/77	6/16/78
Ray Coffin	Rad Safety Officer	9/8/69	8/9/74	
Bruce Failor	Rad Monitor & Safety Officer	8/24/76	10/1/76	
Jackie D. Mills	RSO & Safety Officer	4/14/75	11/14/75	
Clifford Powers	Radiation Monitor	7/1/68	8/19/68	
Richard A. Schoenig	Asst. Site Manager	9/27/76	6/9/78	

INTERROGATORY NO. 28: Identify all contractors who worked on the facility, dates on which such work took place, the nature of such work and any reports completed by such contractors.

ANSWER:

Firm: Law Engineering Testing Company  
2749 Delk Road, S.E.  
Marietta, GA 30067

Type Service: General Consulting and Engineering

Dates: 1975 to Present

Reports Completed: All such reports are part of this proceeding

Firm: Daily & Associates  
1703 W. Luthy Drive  
Peoria, IL 61614

Type Service: General Consulting and Engineering,  
Environmental Testing

Dates: 1973 to Present

Reports Completed: Compaction Tests

Firm: Emcon Associates  
1420 Koll Circle  
San Jose, CA 95122

Type Service: General Engineering and Consulting

Dates: Early 1972 to June 1976

Reports Completed: All such reports are either part of this proceeding or part of Docket 27-39

Firm: Dames and Moore  
20 Harlem Avenue  
White Plains, NY 10603

Type Service: Computer Modeling of Groundwater Flow

Dates: May 1979 to June 1980

Reports Completed: None

Firm: Teledyne Isotopes  
50 Van Buren Avenue  
Westwood, NJ 07675

Type Service: Environmental Analysis

Dates: March 1979 - June 1979

Reports Completed: Monthly results reported

Firm: R. S. Landaver, Jr. and Company  
Glenwood Science Park  
Glenwood, IL 60425

Type Service: Film Badge Service

Dates: Nov. 1976 - Present; Nov. 1968 - Oct. 1970

Reports: Monthly dosimetry report

Firm: G. D. Searle and Company  
Box 367, Pakton St. Station  
Des Plaines, IL 60018

Types Service: Film Badge

Dates: Nov. 1970 - Nov. 1976

Reports: Monthly

Firm: Eberline Instrument Corporation  
805 Early Street  
Santa Fe, NM 89501

Type Service: Film Badge, Bioassay, Environmental Analysis,  
Instrument Calibration

Dates: Sept. 1968 - Present

Reports: Monthly Dosimetry Report

Firm: Radiation Management  
8508 Market Street  
Philadelphia, PA 19104

Type Service: Whole Body Counts, Environmental Analysis

Dates: May 1978 - Present

Reports: Monthly reports of results

Firm: Helgeson Nuclear Service, Inc.  
5587 Sunol Blvd.  
Pleasanton, CA 94566

Type Service: Whole Body Counts

Dates: 1976 - Present

Reports: Reports whenever analysis done

INTERROGATORY NO. 29: Identify any contractors or consultants who have provided consulting services to the Applicant concerning the facility, and state for each such contractor or consultant the nature of the work performed, the dates during which such work was performed, and the report or study, if any, produced by such contractor.

ANSWER: All contractors or consultants that have provided consulting services are identified in the Response to Interrogatory 28 except for:

Firm: Dr. David Schrieber  
Consulting Engineer  
P. O. Box 1087  
Coeur D'Alene, ID 83814

Dates: May 1979 - Present

Type Service: Hydrogeologic Analysis

Reports: None

INTERROGATORY NO. 61: Describe any existing arrangements or agreements with any governmental or police agencies for the surveillance of the facilities.

ANSWER: The Bureau County Sheriff's Department has verbally agreed to observe the facility from time to time.



INTERROGATORY NO. 65: State based on your current knowledge of the area within 10 miles of the facility, whether that the facility meets the requirements of the Illinois Department of Public Health, Illinois Department of Nuclear Safety, and the NRC concerning population density and distance.

ANSWER: Yes, it does.

INTERROGATORY NO. 67: (a) State, based on those developments which have taken place subsequent to March 8, 1979 and information developed over the last three years, whether the topography of the site satisfies the characteristics required in the Illinois Department of Nuclear Safety and NRC criteria for such facilities.

(b) If the answer to Interrogatory 67(a) is affirmative state basis for answer.

ANSWER: Yes, it does based on inspection reports already a part of the record of this proceeding.

INTERROGATORY NO. 68: (a) State whether the facility at present constitutes a threat or hazard to the public health and safety, or could constitute a threat to the public health and safety now and or in the foreseeable future.

(b) State in detail any reasons to substantiate that no hazard now exists or will exist in the foreseeable future.

ANSWER: (a) No

(b) See application for license, see particularly the Safety Analysis and Environmental Report and the responses to the questions posed by NRC to NECO during the evaluation of NECO's application. The Safety Analysis and Environmental Report

and the responses to the NRC questions are already a part of this proceeding. Past and current environmental samples verify the fact that the site is in full compliance with the applicable portions of 10 CFR.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

  
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T. S. Baer