



1. Identify the seismic parameters which you contend should be applied in assessing liquefaction potential at the La Crosse site.

(a) Identify and describe all factual data on which you rely in support of this contention;

(b) Explain how this factual data supports the seismic parameters which you contend should be applied;

(c) Identify each document on which you rely in support of your contention.

2. Identify the bases, if any, for your disagreement with the Staff's reliance in reviewing liquefaction potential on an earthquake of magnitude 5.0 to 5.5 at a distance of less than 25 KM producing a peak ground acceleration of 0.12g and an equivalent duration of 5 cycles at the La Crosse site.

(a) Identify and describe all factual data on which you rely in support of these bases;

(b) Explain how this factual data supports each of these bases;

(c) Identify each document on which you rely in support of each of these bases.

3. State the name and address of each person whom you have engaged to conduct any reviews or analyses related to the seismicity of the La Crosse site. As to each person, provide the following information:

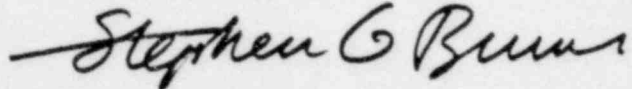
(a) Professional qualifications, including educational history, technical training, and work experience;

(b) Subject matter of any review or analysis performed by the person;

(c) A description of any review or analysis performed by the person and a summary of the results of the review or analysis; and

(d) An identification of any written reports or documents prepared by the person as part of any such review or analysis.

Respectfully submitted,

A handwritten signature in cursive script that reads "Stephen G. Burns". The signature is written in dark ink and is positioned above the typed name and title.

Stephen G. Burns  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 25th day of February, 1981

