

DESIGNATED ORIGINAL

May 17, 1982

Certified By

Jeanne Hunt
DS07

Lee Breckenridge
 Assistant Attorney General
 450 James Robertson Parkway
 Nashville, Tennessee 37219

In the Matter of
 UNITED STATES DEPARTMENT OF ENERGY
 PROJECT MANAGEMENT CORPORATION
 TENNESSEE VALLEY AUTHORITY
 (Clinch River Breeder Reactor Plant)
Docket No. 50-537

Dear Ms. Breckenridge:

Enclosed are copies of the signed and notarized affidavits of the NRC Staff who participated in updating answers to interrogatories and requests for admissions in the case prior to April, 1977. Also included are the affidavits of those individuals who answered Natural Resources Defense Council, Inc. and the Sierra Club Twenty-second Set of Interrogatories to Staff filed on March 18, 1982 and Intervenor's, Natural Resources Defense Council, Inc. and Sierra Club, Twenty-third Set of Interrogatories and Request to Produce to the Staff filed on March 26, 1982.

Sincerely,

Daniel T. Swanson
 Counsel for NRC Staff

Enclosures:
 as stated

cc: Service List with enclosures

DS07

OFC	:OELD	:OELD	:OELD	:	:	:	:
NAME	:MSweeney/ed	:DTSwanson	:SATreby	:	:	:	:
DATE	:05/12/82	:05/13/82	:05/ /82	:	:	:	:

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF CARDIS L. ALLEN

I, Cardis L. Allen, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the Request for Admissions pertaining to Contention 2 (renumbered as 1) #81 through #95 and I hereby certify that the answers given are true to the best of my knowledge.


Cardis L. Allen

Subscribed and sworn to before me
this 6th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

NOS 6-9-82
7/5

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

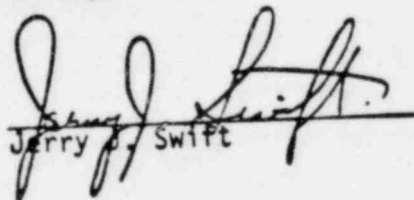
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

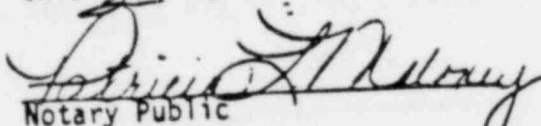
AFFIDAVIT OF JERRY J. SWIFT

I, Jerry J. Swift, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the March 18, 1982 9th Request for Admissions, Section II, concerning Contention 3 (re-numbered as 2) #1 through #6 and I hereby certify that the answers given are true to the best of my knowledge.


Jerry J. Swift

Subscribed and sworn to before me
this 3rd day of May, 1982.


Notary Public

My Commission expires: 9/1/82

NOS 6-9-82
75

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

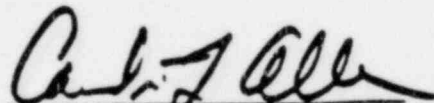
Docket No. 50-537

(Clinch River Breeder Reactor Plant)


AFFIDAVIT OF CARDIS L. ALLEN

I, Cardis L. Allen, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the August 13, 1976 Request for Admissions concerning contention 2 (renumbered as 1) #1 through #5 and I hereby certify that the answers given are true to the best of my knowledge.


CARDIS L. ALLEN

Subscribed and sworn to before me
this 6th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

nos 6-9-82
75

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY


(Clinch River Breeder Reactor
Plant)

Docket No. 50-537


AFFIDAVIT OF ROBERT J. DUBE

I, Robert J. Dube, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Chief of Regulatory Activities and Analyses Section, Fuels Facilities Safeguards Licensing Branch, Division of Safeguards, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering the Request for Admissions pertaining to Contention 5 (renumbered as 4) #1 through 38 and I hereby certify that the answers given are true to the best of my knowledge.


ROBERT J. DUBE

Subscribed and sworn to before me
this 22nd day of April, 1982.


Notary Public

My Commission expires: July 1, 1982

NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

105 6-9-82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

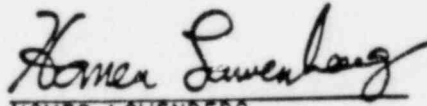
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

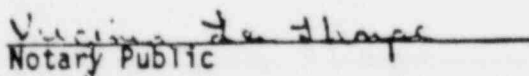
AFFIDAVIT OF HOMER LOWENBERG

I, Homer Lowenberg, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as Chief Engineer, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering the Requests for Admissions pertaining to Contention 9 (renumbered as 6) #1 through 10 and I hereby certify that the answers given are true to the best of my knowledge.


HOMER LOWENBERG

Subscribed and sworn to before me
this 30th day of April, 1982.


Notary Public

My Commission expires: July 1, 1982

PO- 6-8-82
7/13

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

I, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the September 16, 1976 Request for Admissions concerning contention 5 (renumbered as 4) #50 and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
BILL M. MORRIS

Subscribed and sworn to before me
this 5th day of May, 1982.

Patricia J. Maloney
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

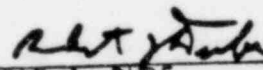
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

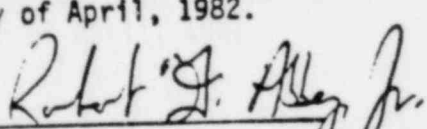
AFFIDAVIT OF ROBERT J. DUBE

I, Robert J. Dube, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Chief of Regulatory Activities and Analyses Section, Fuels Facilities Safeguards Licensing Branch, Division of Safeguards, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering the Request for Admissions pertaining to Contention 5 (renumbered as 4) #39 through 56 and I hereby certify that the answers given are true to the best of my knowledge.


ROBERT J. DUBE

Subscribed and sworn to before me
this 28th day of April, 1982.


Notary Public

My Commission expires: July 1, 1982

ROBERT F. ABBEY, JR.
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

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) Docket No. 50-537
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)

AFFIDAVIT OF MICHAEL BENDER

I, Michael Bender, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission (NRC) as a Consultant through a contract between the Clinch River Breeder Reactor Program Office, NRC, and Brookhaven National Laboratories.
2. I am employed by the Brookhaven National Laboratories as a Senior Scientist in the Medical Department.
3. I am duly authorized to participate in answering the September 16, 1976 Request for Admissions concerning contention 8a (re-numbered as 11) #21 through #36, #41 and #42 and I hereby certify that the answers given are true to the best of my knowledge.

Michael Bender
MICHAEL BENDER

Subscribed and sworn to before me

this 6th day of May, 1982.

Geraldine Callister
Notary Public

GERALDINE CALLISTER
Public State of New York
County of Suffolk
No. 0542985

My Commission Expires: March 30, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

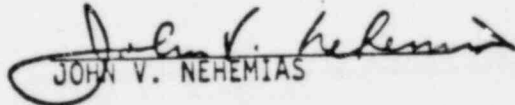
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

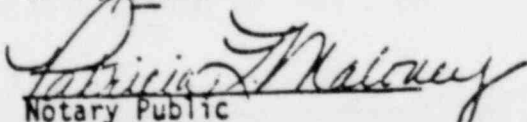
AFFIDAVIT OF JOHN V. NEHEMIAS

I, John V. Nehemias, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Senior Health Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the September 16, 1976 Request for Admissions concerning contention 8a (renumbered as 11) #36 through #40 and I hereby certify that the answers given are true to the best of my knowledge.


JOHN V. NEHEMIAS

Subscribed and sworn to before me
this ~~14th~~ day of May, 1982.


Notary Public

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

I, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the Request for Admission #1 through #30 concerning contention 3 (renumbered as 2) and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
BILL M. MORRIS

Subscribed and sworn to before me
this 5th day of May, 1982.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

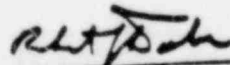
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

AFFIDAVIT OF ROBERT J. DUBE

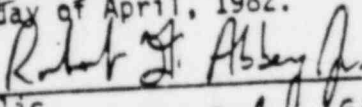
I, Robert J. Dube, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Chief of Regulatory Activities and Analyses Section, Fuel Facility Safeguards Licensing Branch, Division of Safeguards, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering the Request for Admissions pertaining to Contention 2 (renumbered as 1) #6 through 30 and I hereby certify that the answers given are true to the best of my knowledge.



ROBERT J. DUBE

Subscribed and sworn to before me
this 24th day of April, 1982.



Notary Public
My Commission expires: July 1, 1982

ROBERT F. ABBEY, JR.
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

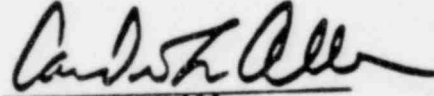
(Clinch River Breeder Reactor Plant)

Docket No. 50-537


AFFIDAVIT OF CARDIS L. ALLEN

I, Cardis L. Allen, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the Requests for Admissions pertaining to Contention 2 (renumbered as 1), #31 through #80 and I hereby certify that the answers given are true to the best of my knowledge.


Cardis L. Allen

Subscribed and sworn to before me
this 6th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

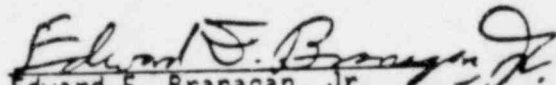
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

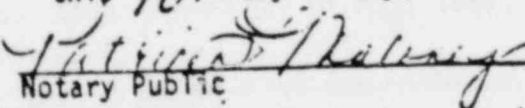
AFFIDAVIT OF EDWARD F. BRANAGAN, JR

I, Edward F. Branagan, Jr., being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Radiological Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1, #10, #11, and #12 pertaining to Contention 8 (renumbered as 11) of the 22nd Set and I hereby certify that the answers given are true to the best of my knowledge.


Edward F. Branagan, Jr.

Subscribed and sworn to before me
this 10th day of May, 1982.


Notary Public

My Commission expires: 7/1/83.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

I, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatory IV, #1 of the 22nd Set and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
Bill M. Morris

Subscribed and sworn to before me
this 5th day of May, 1982.

Patricia J. Maloney
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

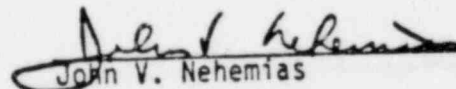
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

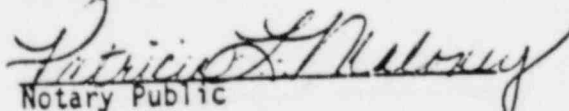
AFFIDAVIT OF JOHN V. NEHEMIAS

I, John V. Nehemias, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Senior Health Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #2 through #5 of Section II of the 22nd Set and I hereby certify that the answers given are true to the best of my knowledge.


John V. Nehemias

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

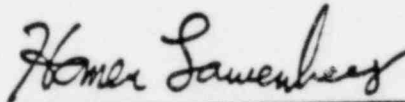
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

AFFIDAVIT OF HOMER LOWENBERG

I, Homer Lowenberg, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as
Chief Engineer, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering Interrogatory #1(a)
and (b) of the 22nd Set and I hereby certify that the answers given
are true to the best of my knowledge.


HOMER LOWENBERG

Subscribed and sworn to before me
this 30th day of April, 1982.


Notary Public

My Commission expires: July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY


(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

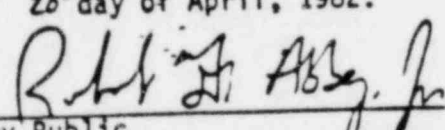
AFFIDAVIT OF ROBERT J. DUBE

I, Robert J. Dube, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Chief of Regulatory Activities and Analyses Section, Fuels Facilities Safeguards Licensing Branch, Division of Safeguards, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering Interragatories #1 and #20 of the 23rd Set and I hereby certify that the answers given are true to the best of my knowledge.


ROBERT J. DUBE

Subscribed and sworn to before me
this 26th day of April, 1982.


Notary Public

My Commission expires:

July 1, 1982

NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY


(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

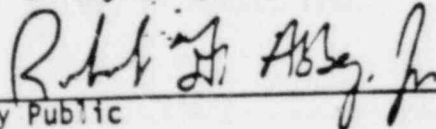
AFFIDAVIT OF ROBERT J. DUBE

I, Robert J. Dube, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Chief of Regulatory Activities and Analyses Section, Fuels Facilities Safeguards Licensing Branch, Division of Safeguards, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering Interragatories #1 and #20 of the 23rd Set and I hereby certify that the answers given are true to the best of my knowledge.


ROBERT J. DUBE

Subscribed and sworn to before me
this 28 day of April, 1982.


Notary Public

My Commission expires: July 1, 1982

NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

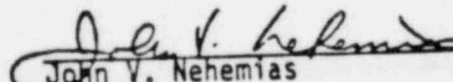
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF JOHN V. NEHEMIAS

I, John V. Nehemias, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Senior Health Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the July 28, 1976 Requests for Admissions pertaining to Contention 8a (renumbered as 11) #1, #2, #13 through #16, #19 and #20 and I hereby certify that the answers given are true to the best of my knowledge.


John V. Nehemias

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket No. 50-537

1. I am employed by the U.S. Nuclear Regulatory Commission (NRC) as a Consultant through a contract between the Clinch River Breeder Reactor Program Office, NRC, and Brookhaven National Laboratories.
2. I am employed by the Brookhaven National Laboratories as a Senior Scientist in the Medical Department.
3. I am duly authorized to participate in answering the July 28, 1976 Request for Admissions pertaining to Contention 8a (renumbered

as 11, #4, #5, #8, #9, #11, #12, and #17 and I hereby certify that the answers given are true to the best of my knowledge.

Michael Bender

MICHAEL BENDER

Subscribed and sworn to before me

this 6th day of May, 1982.

Geraldine Callister

Notary Public

GERALDINE CALLISTER
Notary Public, State of New York
Residing in Suffolk County
152-0542885
My Commission Expires March 30, 1983

My Commission expires: March 30, 1983.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

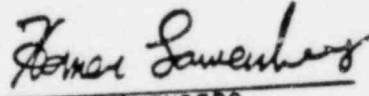
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537


AFFIDAVIT OF HOMER LOWENBERG

I, Homer Lowenberg, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as
Chief Engineer, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering the Requests for
Admissions pertaining to Contention 7 (renumbered as part of 11)
#1 through #5 and I hereby certify that the answers given are true
to the best of my knowledge.


HOMER LOWENBERG

Subscribed and sworn to before me
this 20th day of April, 1982.


Notary Public

My Commission expires: July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

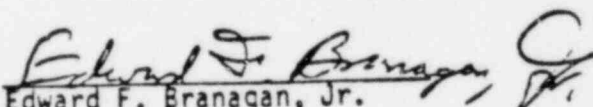
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

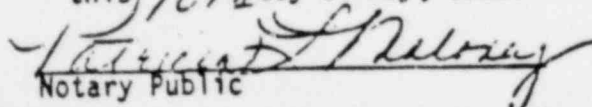
AFFIDAVIT OF EDWARD F. BRANAGAN, JR

I, Edward F. Branagan, Jr., being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Radiological Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the July 28, 1976 Requests for Admissions pertaining to contention 7 (renumbered as 11) #6 through #33; pertaining to contention 8a (renumbered as 11) #3, #6, #7, #9, #10, #17 and #18; pertaining to contention 8c (renumbered as 11) #1 through #19 and I hereby certify that the answers given are true to the best of my knowledge.


Edward F. Branagan, Jr.

Subscribed and sworn to before me
this 10th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

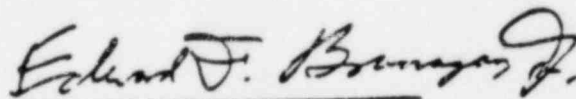
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF EDWARD F. BRANAGAN, JR.

I, Edward F. Branagan, Jr., being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Radiological Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #10, #13, and #14 of the 19th Set and I hereby certify that the answers given are true to the best of my knowledge.


Edward F. Branagan, Jr.

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

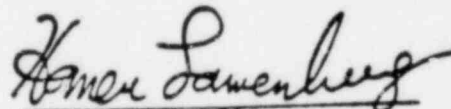
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537


AFFIDAVIT OF HOMER LOWENBERG

I, Homer Lowenberg, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as Chief Engineer, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering Interrogatory # 17a of the 19th Set and I hereby certify that the answers given are true to the best of my knowledge.


HOMER LOWENBERG

Subscribed and sworn to before me
this 30th day of April, 1982.


Notary Public

My Commission expires: July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF EDWARD F. BRANAGAN, JR.

I, Edward F. Branagan, Jr., being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Radiological Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #84 through #89 of the 20th Set and I hereby certify that the answers given are true to the best of my knowledge.

Edward F. Branagan, Jr.
EDWARD F. BRANAGAN, JR.

Subscribed and sworn to before me
this 4th day of May, 1982.

Patricia L. Keloney
NOTARY PUBLIC
My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

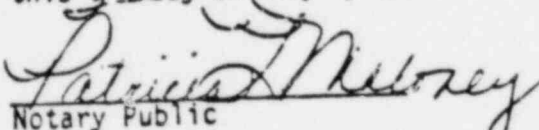
AFFIDAVIT OF MOHAN C. THADANI

I, Mohan C. Thadani, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Accident Evaluation Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #46, #47, #48, #49, #50, #51, #52, #53, #74, #75 of the 20th Set and I hereby certify that the answers given are true to the best of my knowledge.


MOHAN C. THADANI

Subscribed and sworn to before me
this 3rd day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF RICHARD BECKER

I, Richard Becker, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #45, #49, #53, #82, and #83 of the 20th Set and I hereby certify that the answers given are true to the best of my knowledge.


RICHARD BECKER

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

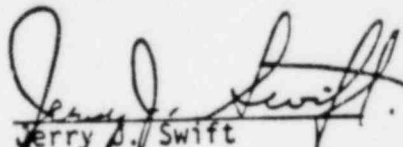
(Clinch River Breeder Reactor Plant)

Docket No. 50-537


AFFIDAVIT OF JERRY J. SWIFT

I, Jerry J. Swift, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #74 to #76 of the 20th Set and I hereby certify that the answers given are true to the best of my knowledge.


Jerry J. Swift

Subscribed and sworn to before me
this 3rd day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

AFFIDAVIT OF PAUL LEECH

I, Paul Leech, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #70 through #73, #76 and #90 of the 20th Set and I hereby certify that the answers given are true to the best of my knowledge.

Paul Leech
PAUL LEECH

Subscribed and sworn to before me
this 4th day of May, 1982.

Patricia L. Maloney
Notary Public
My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

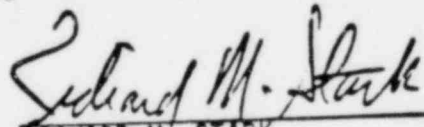
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

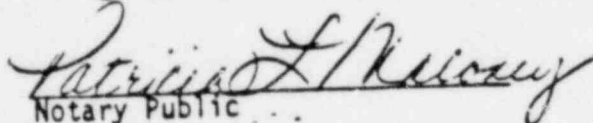
AFFIDAVIT OF RICHARD M. STARK

I, Richard M. Stark, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatory #90 of the 20th Set and I hereby certify that the answers given are true to the best of my knowledge.


RICHARD M. STARK

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

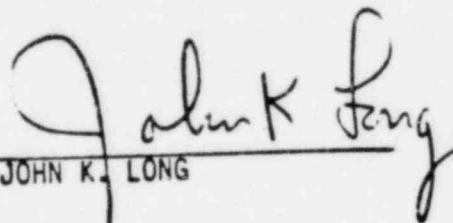
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

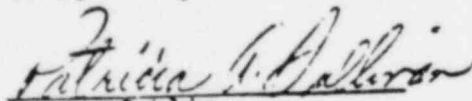
AFFIDAVIT OF JOHN K. LONG

I, John K. Long, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Research Systems Branch, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #45, #49, #53, #54, #63, #64, #65, #66, #67, #68, #69, #77, #78, #82 and #83 of the 20th Set and I hereby certify that the answers given are true to the best of my knowledge.


JOHN K. LONG

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

My Commission expires:

My Commission Expires October 14, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

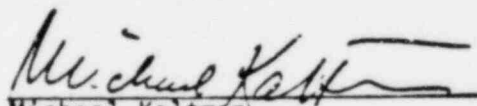
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537


AFFIDAVIT OF MICHAEL KALTMAN

I, Michael Kaltman, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Regional Planning Analyst, Siting Analysis Branch, Division of Engineering, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #79, #80 and #81 of the 20th Set and I hereby certify that the answers given are true to the best of my knowledge.


Michael Kaltman

Subscribed and sworn to before me
this 30 day of May, 1982.


Notary Public

My Commission expires: 7/1/83

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

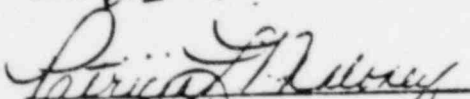
AFFIDAVIT OF CARDIS L. ALLEN

I, Cardis L. Allen, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #12 of the 21st Set and I hereby certify that the answers given are true to the best of my knowledge.


Cardis L. Allen

Subscribed and sworn to before me
this 6th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

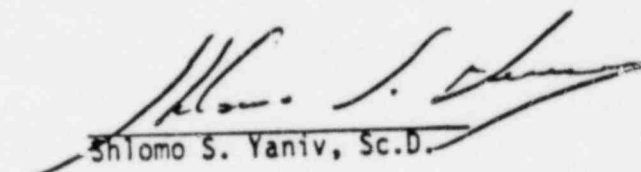
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

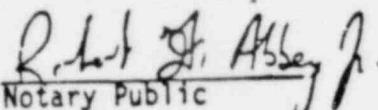
AFFIDAVIT OF SHLOMO S. YANIV, Sc.D.

I, Shlomo S. Yaniv, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Radiological and Health Effects Specialist, Health Effects Branch, Division of Health, Siting, and Waste Management, Office of Nuclear Regulatory Research.
2. I am duly authorized to participate in answering Interrogatories #6, #7, #8 and #9 of Section II of the 22nd Set and I hereby certify that the answers given are true to the best of my knowledge.


Shlomo S. Yaniv, Sc.D.

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

ROBERT F. ABBEY, JR.
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

My Commission expires: July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

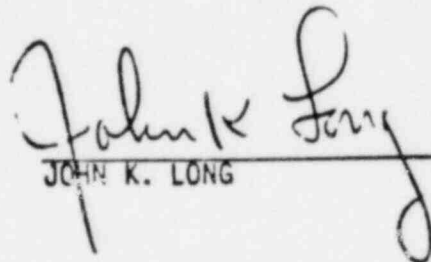
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

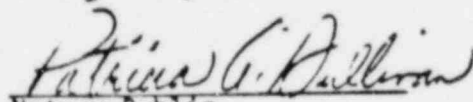
AFFIDAVIT OF JOHN K. LONG

I, John K. Long, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Research Systems Branch, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1, #3, #12 of the 17th Set and I hereby certify that the answers given are true to the best of my knowledge.


JOHN K. LONG

Subscribed and sworn to before me
this 5 day of May, 1982.


Notary Public

My Commission expires:

My Commission Expires October 14, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

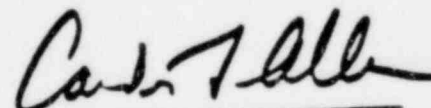
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

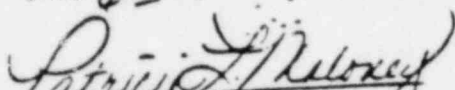
AFFIDAVIT OF CARDIS L. ALLEN

I, Cardis L. Allen, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #4, #8 through #11 of the 17th Set and I hereby certify that the answers given are true to the best of my knowledge.


CARDIS L. ALLEN

Subscribed and sworn to before me
this 6th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of


UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)

Docket No. 50-537


AFFIDAVIT OF HOWARD B. HOLZ

I, Howard B. Holz, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Systems Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 and #2 of the 18th Set and I hereby certify that the answers given are true to the best of my knowledge.


Howard B. Holz

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

I, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 and #2 of the 18th Set and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
Bill M. Morris

Subscribed and sworn to before me
this 5th day of May, 1982.

Patricia L. Maloney
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

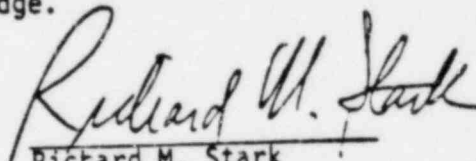
(Clinch River Breeder Reactor Plant)

Docket No. 50-537


AFFIDAVIT OF RICHARD M. STARK

I, Richard M. Stark, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 and #2 of the 18th Set and I hereby certify that the answers given are true to the best of my knowledge.


Richard M. Stark

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

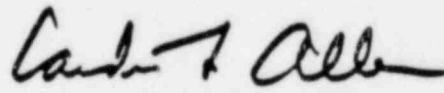
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

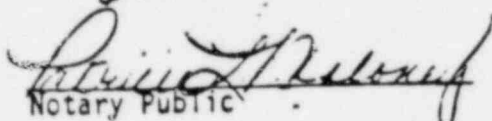
AFFIDAVIT OF CARDIS L. ALLEN

I, Cardis L. Allen, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 and #2 of the 18th Set and I hereby certify that the answers given are true to the best of my knowledge.


Cardis L. Allen

Subscribed and sworn to before me
this 6th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

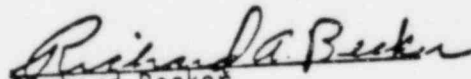
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

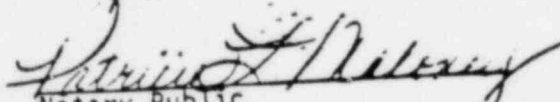
AFFIDAVIT OF RICHARD BECKER

I, Richard Becker, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #2, #17 through #40, #48 and #49 of the 19th Set and I hereby certify that the answers given are true to the best of my knowledge.


Richard Becker

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

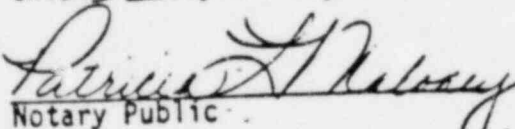
Docket No. 50-537

AFFIDAVIT OF RICHARD M. STARK

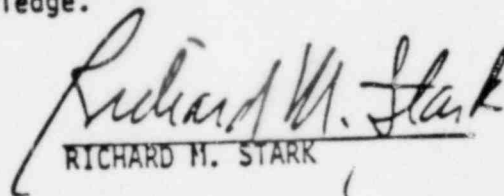
I, Richard M. Stark, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatory #50 of the 19th Set and I hereby certify that the answers given are true to the best of my knowledge.

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

My Commission expires: 7/1/82


RICHARD M. STARK

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

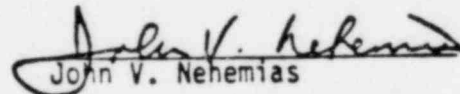
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

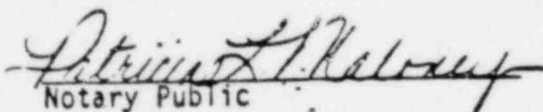
AFFIDAVIT OF JOHN V. NEHEMIAS

I, John V. Nehemias, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Senior Health Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #11, #12, #15 and #16 of the 19th Set and I hereby certify that the answers given are true to the best of my knowledge.


John V. Nehemias

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

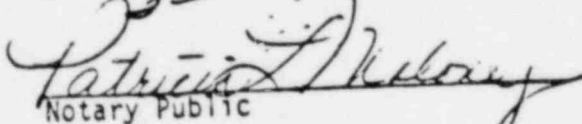
AFFIDAVIT OF MICHAEL KALTMAN

I, Michael Kaltman, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Regional Planning Analyst, Siting Analysis Branch, Division of Engineering, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatory #9 of the 19th Set and I hereby certify that the answers given are true to the best of my knowledge.


Michael Kaltman

Subscribed and sworn to before me
this 31st day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

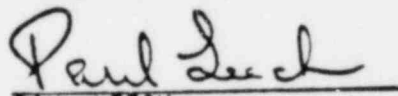
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

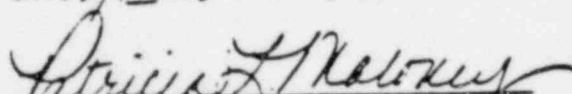
AFFIDAVIT OF PAUL LEECH

I, Paul Leech, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #5, #6, #7, #50 of the 19th Set and I hereby certify that the answers given are true to the best of my knowledge.


PAUL LEECH

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public
My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

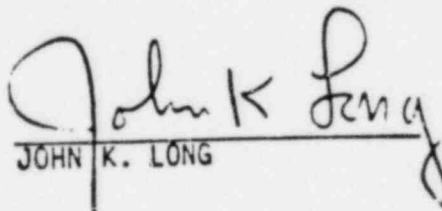
(Clinch River Breeder Reactor Plant)

Docket No. 50-537


AFFIDAVIT OF JOHN K. LONG

I, John K. Long, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Research Systems Branch, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #2, #17 through #40, #48, #49 of the 19th Set and I hereby certify that the answers given are true to the best of my knowledge.


JOHN K. LONG

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

My Commission expires:

My Commission Expires October 14, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537


AFFIDAVIT OF PETER B. ERICKSON

I, Peter B. Erickson, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager, Standardization and Special Projects Branch, Division of Licensing, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #2 and #3 pertaining to Contention 14 (renumbered as 8) of the 10th Set and I hereby certify that the answers given are true to the best of my knowledge.


Peter B. Erickson

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

I, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #68 and #70 through #100 of the 11th Set and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
Bill M. Morris

Subscribed and sworn to before me
this 5th day of May, 1982.

Patricia A. Meloney
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

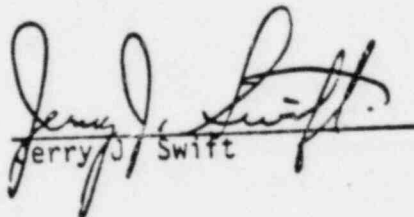
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

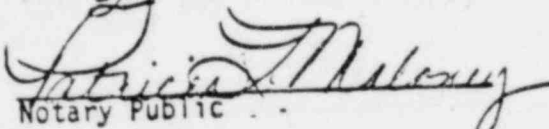
AFFIDAVIT OF JERRY J. SWIFT

I, Jerry J. Swift, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatory #69 of the 11th Set and I hereby certify that the answers given are true to the best of my knowledge.


Jerry J. Swift

Subscribed and sworn to before me
this 3rd day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

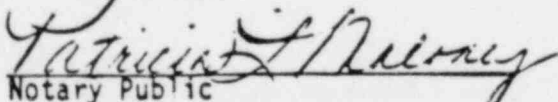
AFFIDAVIT OF EDWARD F. BRANAGAN, JR

I, Edward F. Branagan, Jr., being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Radiological Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #6, through #10 of Section III of the 12th Set and I hereby certify that the answers given are true to the best of my knowledge.


Edward F. Branagan, Jr.

Subscribed and sworn to before me
this 10th day of May, 1982.


Notary Public

My Commission expires: 7/1/82.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

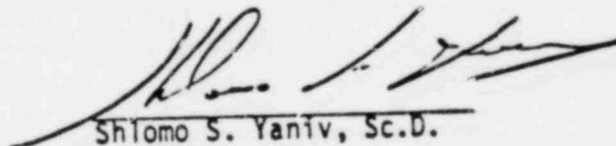
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

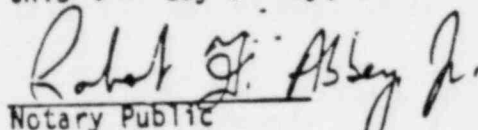
AFFIDAVIT OF SHLOMO S. YANIV, Sc.D.

I, Shlomo S. Yaniv, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Radiological and Health Effects Specialist, Health Effects Branch, Division of Health, Siting, and Waste Management, Office of Nuclear Regulatory Research.
2. I am duly authorized to participate in answering Interrogatories in Section I, #1 through #5, Section II, #1 through #39 and Section III, #1 through #5 of the 12th Set and I hereby certify that the answers given are true to the best of my knowledge.


Shlomo S. Yaniv, Sc.D.

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

ROBERT F. ABBEY, JR.
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

My Commission expires: July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

I, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #54 of the 13th Set and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
BILL M. MORRIS

Subscribed and sworn to before me
this 5th day of May, 1982.

William L. Murray
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

1, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering #1 of Section IV #1 of the 14th Set and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
Bill M. Morris

Subscribed and sworn to before me
this 5th day of May, 1982.

Patricia F. Kellogg
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

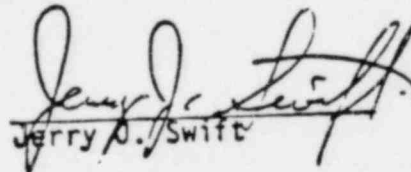
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF JERRY J. SWIFT

I, Jerry J. Swift, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #3 of Section II; #1 through #3 of Section V, #1 of Section VI and #1 of Section VII of the 14th Set and I hereby certify that the answers given are true to the best of my knowledge.


Jerry J. Swift

Subscribed and sworn to before me
this 3rd day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

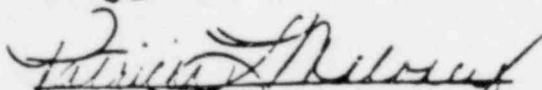
AFFIDAVIT OF CARDIS L. ALLEN

I, Cardis L. Allen, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 - #4 of Section I, #1 and #2 of Section II, #1 and #2 of Section III, #1 of Section VIII and #1 through #5 of Section IX of the 14th Set and I hereby certify that the answers given are true to the best of my knowledge.


Cardis L. Allen

Subscribed and sworn to before me
this 6th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

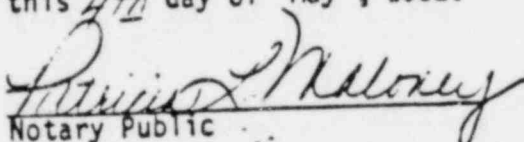
AFFIDAVIT OF HOWARD B. HOLZ

I, Howard B. Holz, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Systems Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #6 of the 16th Set and I hereby certify that the answers given are true to the best of my knowledge.


HOWARD B. HOLZ

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

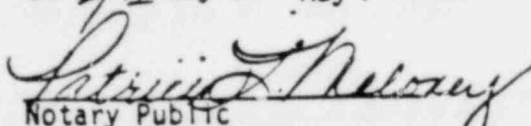
AFFIDAVIT OF RICHARD BECKER

I, Richard Becker, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1, #3, #12 of the 17th Set and I hereby certify that the answers given are true to the best of my knowledge.


RICHARD BECKER

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 9/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

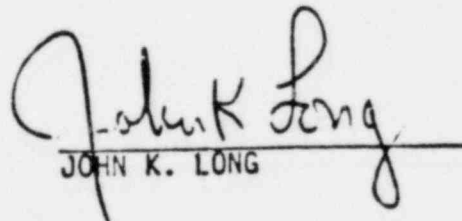
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

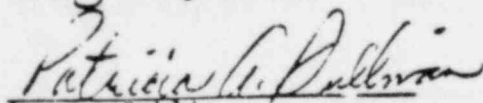
AFFIDAVIT OF JOHN K. LONG

I, John K. Long, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Research Systems Branch, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering the Interrogatories in the 7th Set and I hereby certify that the answers given are true to the best of my knowledge.


JOHN K. LONG

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

My Commission expires:

My Commission Expires October 14, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

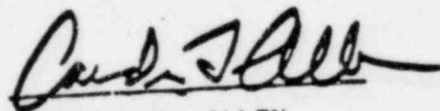
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

AFFIDAVIT OF CARDIS L. ALLEN

I, Cardis L. Allen, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #4 of Section I of the 8th Set and I hereby certify that the answers given are true to the best of my knowledge.


CARDIS L. ALLEN

Subscribed and sworn to before me
this 6th day of May . . 1982


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

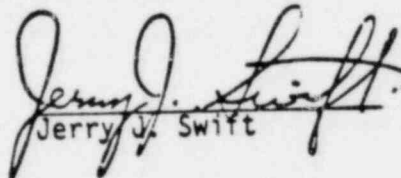
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

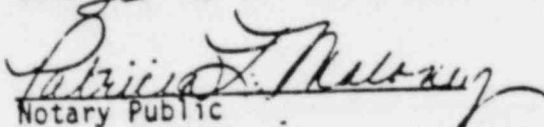
AFFIDAVIT OF JERRY J. SWIFT

I, Jerry J. Swift, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #7 in Section II of the 8th Set and I hereby certify that the answers given are true to the best of my knowledge.


Jerry J. Swift

Subscribed and sworn to before me
this 31st day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

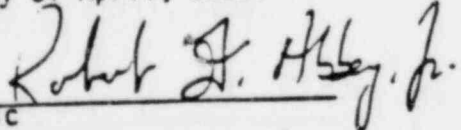
AFFIDAVIT OF ROBERT J. DUBE

I, Robert J. Dube, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Chief of Regulatory Activities and Analyses Section, Fuels Facilities Safeguards Licensing Branch, Division of Safeguards, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering Interrogatories in Section IV, #1 through #5; Section V, #1 through #6; Section VI, #1 through #6; Section VII, #1 through #6; Section VIII, #1 and #2; Section IX, #1 and #2; and Section X, #1 and #2 of the 8th Set and I hereby certify that the answers given are true to the best of my knowledge.


ROBERT J. DUBE

Subscribed and sworn to before me
this 28th day of April, 1982.


Notary Public

ROBERT F. ABBEY, JR.
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

Witness my hand and seal: T. L. 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

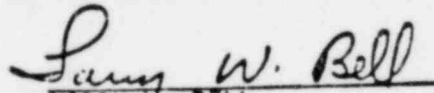
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537


AFFIDAVIT OF LARRY W. BELL

I, Larry W. Bell, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer with the Accident Evaluation Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories 8(a) and 10 of the 9th Set of Interrogatories, and I hereby certify that the answers given are true to the best of my knowledge.


LARRY W. BELL

Subscribed and sworn to before me
this 11 day of May, 1982.


Notary Public
My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

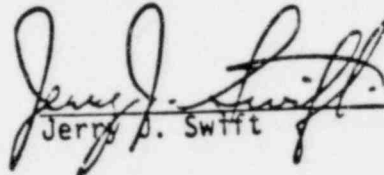
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

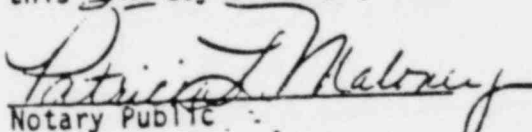
AFFIDAVIT OF JERRY J. SWIFT

I, Jerry J. Swift, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Reactor Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #8a and #10 of the Ninth Set and I hereby certify that the answers given are true to the best of my knowledge.


Jerry J. Swift

Subscribed and sworn to before me
this 5th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

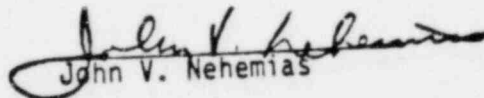
(Clinch River Breeder Reactor Plant)

Docket No. 50-537


AFFIDAVIT OF JOHN V. NEHEMIAS

I, John V. Nehemias, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Senior Health Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 and #2 of Section I; #1 and #2 of Section II and #1 through #8 of Section III of the 10th Set and I hereby certify that the answers given are true to the best of my knowledge.


John V. Nehemias

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

I, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #15 of Section I and #1 through #47 of Section 'I of the 2nd Set and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
BILL M. MORRIS

Subscribed and sworn to before me
this 5th day of May, 1982.

Patricia M. Newby
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

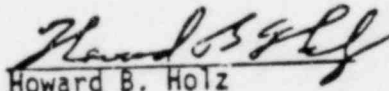
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

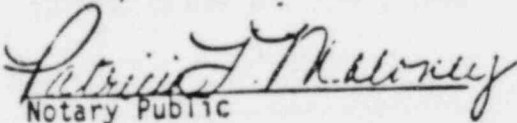
AFFIDAVIT OF HOWARD B. HOLZ

I, Howard B. Holz, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Systems Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #15 of Section I and #1 through #30 of Section II of the 3rd Set and I hereby certify that the answers given are true to the best of my knowledge.


Howard B. Holz

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF BILL M. MORRIS

I, Bill M. Morris, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Leader of the Technical Review Section, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #7 of Section I and #1 through #28 of the 4th Set and I hereby certify that the answers given are true to the best of my knowledge.

Bill M. Morris
Bill M. Morris

Subscribed and sworn to before me
this 5th day of May, 1982.

Patricia L. Maloney
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

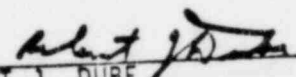
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537


AFFIDAVIT OF ROBERT J. DUBE

I, Robert J. Dube, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Section Chief of Regulatory Activities and Analyses Section, Fuels Facilities Safeguards Licensing Branch, Division of Safeguards, Office of Nuclear Material Safety and Safeguards.
2. I am duly authorized to participate in answering Interrogatories in Section III, #1 through #9 of the 6th Set and I hereby certify that the answers given are true to the best of my knowledge.


ROBERT J. DUBE

Subscribed and sworn to before me
this 24th day of April, 1982.


Notary Public

My Commission expires: July 1, 1982

ROBERT J. ABBEY, JR.
NOTARY PUBLIC STATE OF MARYLAND
My Commission Expires July 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF CHARLES L. MILLER

I, Charles L. Miller, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Effluent Treatment Systems Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatory #10 of the 1st Set and I hereby certify that the answers given are true to the best of my knowledge.

Charles L. Miller
CHARLES L. MILLER

Subscribed and sworn to before me
this 3rd day of May, 1982.

Patricia M. McHenry
Notary Public

My Commission expires:

7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

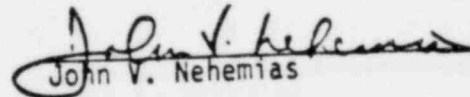
UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF JOHN V. NEHEMIAS

I, John V. Nehemias, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Senior Health Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatory #11 of the 1st Set and I hereby certify that the answers given are true to the best of my knowledge.


John V. Nehemias

Subscribed and sworn to before me
this 4th day of May, 1982.


Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

Docket No. 50-537

AFFIDAVIT OF LARRY W. BELL

I, Larry W. Bell, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Accident Evaluation Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatory #9 of the 1st Set and I hereby certify that the answers given are true to the best of my knowledge.

Larry W. Bell
LARRY W. BELL

Subscribed and sworn to before me
this 14 day of May, 1982.

Patricia L. Maloney
Notary Public

My Commission expires: 7/1/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

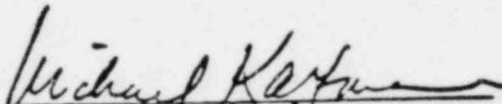
(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

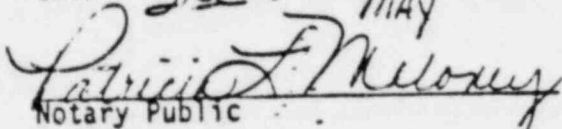
AFFIDAVIT OF MICHAEL KALTMAN

I, Michael Kaltman, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Regional Planning Analyst, Siting Analysis Branch, Division of Engineering, Office of Nuclear Reactor Regulation.
2. I am responsible for providing the updated answers to the State of Tennessee Interrogatories, and I hereby certify that the updated answers are true to the best of my knowledge.


Michael Kaltman

Subscribed and sworn to before me
this 31 day of MAY, 1982.


Notary Public

My Commission expires: 7/1/82

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket No. 50-537

1. I am employed by the U.S. Nuclear Regulatory Commission (NRC) as a Consultant through a contract between the Clinch River Breeder Reactor Program Office, NRC, and Brookhaven National Laboratories.
2. I am employed by the Brookhaven National Laboratories as a Senior Scientist in the Medical Department.
3. I am duly authorized to participate in answering the March 18, 1979 Request for Admissions pertaining to Contention 8b (number

as 11) #1 through #12 and I hereby certify that the answers given are true to the best of my knowledge.

Michael Bender
MICHAEL BENDER

Subscribed and sworn to before me
this 6th day of May, 1982.

Geraldine Callister
Notary Public

GERALDINE CALLISTER
Notary Public, State of New York
Residing in Suffolk County
152-0542983
My Commission Expires March 28, 1983

My Commission expires: March 30, 1983