May 17, 1982

DESIGNATED ORIGINAL

Certified By

anne Huntin

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 Counsil, Inc. and the Sierra Club Twenty-second Set of Interrogatories to Staff filed on March 18, 1982 and Intervenors', 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

DS07

Enclosures: as stated

8206100309 820517 PDR ADOCK 05000537

cc: Service List with enclosures

PDR

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

# UNITED STATES OF AMERICA

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES 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:

- 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 6 H day of May, 1982.

NOS 6-9-82

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

22

::

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF JERRY J. SWIFT

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

- 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 (renumbered as 2) #1 through #6 and I hereby certify that the answers given are true to the best of my knowledge.

Subscribed and sworn to before me this 3.4 day of. May, 1982.

Notary

NOS 6-9-

### 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:

- 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 participle 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.

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

NOS 4-9-82

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

.....

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF ROBERT J. DUBE

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

- 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 Haterial Safety and Safeguards.
- 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.

105 6-9-82

Subscribed and sworn to before me this 21 day of April, 1982. C Notary Public My Commission expires:

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

....

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

18 :

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF HOMER LOWENBERG

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

- I am employed by the U.S. Nuclear Regulatory Commission as 1. Chief Engineer, Office of Nuclear Material Safety and Safeguards.
- I am duly authorized to participate in answering the Requests for 2. 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.

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

Notary Public though

My Commission expires: July 1, 1922

po= 6-9-82

### 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 BILL M. MORRIS

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

- 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.

m moris

Subscribed and sworn to before me this 57, day of May, 1982.

Notary

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### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

### In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF ROBERT J. DUBE

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

- 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.
- 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.

Subscribed and sworn to before me this 78 'z day of April, 1982.

Notary Public My Commission expires: J.g. 1 Mag2 ROATPT P. ARCEY, JR. NOTARY PUBLIC STATE OF MARYLAND My Commission Expires July 1, 1982

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITH Docket No. 50-537

(Clinch River Breeder Reactor Plant) )

#### AFFIDAVIT OF MICHAEL BENDER

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

- 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.
- 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 (renumbered as 11) #21 through #36, #41 and #42 and I hereby certify that the answers given are true to the best of my knowledge.

Subscribed and sworn to before me

this 6 day of May,	1982. SALDINE CALLISTER
Genedini Callister	
Notary Public	
My Commission Expires:	march 30, 1983

. .

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docknt No. 50-537

٠.

(Clinch River Breeder Reactor Plant) )

#### AFFIDAVIT OF JOHN V. NEHEMIAS

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

- 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.

metin hekenin

Subscribed and sworn to before me this 144day of May , 1982.

Kalone Notary

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2

### 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 BILL M. MORRIS

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

- 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.

M. MORPIS

Subscribed and sworn to before me this 577 day of May , 1982.

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. . .

# BEFORE THE ATOMIC SAFETY AND LICENSING BOAPD

### In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF ROBERT J. DUBE

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

- 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.

ROBER

Subscribed and sworn to before me April, 1982. 24 day of this Notary Public My Commission expires:

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

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES 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:

- 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.

Subscribed and sworn to before me this 64 day of May , 1982.

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

.....

(Clinch River Breeder Reactor Plant) )

### AFFIDAVIT OF EDWARD F. BRANAGAN, JR

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

- 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.

1183

ard F. Branagan Ir

Subscribed and sworn to before me this // Hiday of May, 1982.

My Commission expires: \_\_\_\_

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF BILL M. MORRIS

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

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

1 m. Moris

Subscribed and sworn to before me this\_57 day of May , 1982.

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My Commission expires:

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

Ń

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF JOHN V. NEHEMIAS

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

- I am employed by the U.S. Nuclear Regulatory Commission as a 1. Senior Health Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
- I am duly authorized to participate in answering Interrogatories #2 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.

int helen

Subscribed and sworn to before me this 44 day of May , 1982.

Notary Public My Commission expires: 7/182

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### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF HOMER LOWENBERG

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

- I am employed by the U.S. Nuclear Regulatory Commission as Chief Engineer, Office of Nuclear Material Safety and Safeguards.
- 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.

thank Notary Public

My Commission expires: July 1, 1982

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

#### In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

•

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF ROBERT J. DUBE

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

- I \_\_\_\_\_ 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.
- 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.

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

Notary Public

My Commission expires: Jy ! 1982

NOTARY PUELIC STATE OF MAPYLAND My Commission Expires July 1, 1982

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF ROBERT J. DUBE

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

- 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.
- 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.

11982

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

Notary

My Commission expires:

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

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

•

(Clinch River Breeder Reactor Plant) )

## AFFIDAVIT OF JOHN V. NEHEMIAS

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

- 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.

Nehemine

Subscribed and sworn to before me this 444 day of May , 1982.

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## 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) )

### AFFIDAVIT OF MICHAEL BENDER

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

- 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.
- I am employed by the Brookhaven National Laboratories as a Senior Scientist in the Medical Department.
- I am duly authorized to participate in answering the
   July 28, 1976 Request for Admissions pertaining to Contention
   8a (renumbered

as 11, 14, 15, 18, 19, 111, 112, and 117 and I hereby certify that the answers given are true to the best of my knowledge.

Muhal Berler

.....

MICHAEL BENDER

Subscribed and sworn to before me

this 6th day of May, 1982.

Jenedini Callister

Notary Public

STRALDINF CALLISTER Salary Public, State of Non Tast Reading in Suffak County 152-0542888 Ar Commission Suffak North M. 155

My Commission expires: march 30, 1983.

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# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

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(Clinch River Coeder Reactor Plant)

# AFFIDAVIT OF HOMER LOWENBERG

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

- 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.

Home Sawenhard

HOMER LOWENBERG

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

Notary Public Sharpe

My Commission expires: July 1, 1922

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant) )

### AFFIDAVIT OF EDWARD F. BRANAGAN, JR

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

- 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.

hand & Bringan of

Subscribed and sworn to before me this) / C / (day of May, 1982.

My Commission expires:

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

.

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF EDWARD F. BRANAGAN, JR.

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

- I am employed by the U.S. Nuclear Regulatory Commission as a Radiclogical Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
- 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 44 day of May , 1982.

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF HOMER LOWENBERG

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

- I am employed by the U.S. Nuclear Regulatory Commission as Chief Engineer, Office of Nuclear Material Safety and Safeguards.
- 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.

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

Notary Public I have

My Commission expires: July 1, 1982

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF EDWARD F. BRANAGAN, JR.

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

- 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.

Subscribed and sworn to before me this 44 day of May, 1982.

My Commission expires:

# 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 MOHAN C. THADANI

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

- 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 CShordani

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

#### 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 RICHARD BECKER

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

- 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.
- 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.

ad a Berlun

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

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

-

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF JERRY J. SWIFT

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

- 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.
- 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.

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

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket No. 50-537

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF PAUL LEECH

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

- 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.

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

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

3

1

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF RICHARD M. STARK

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

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

and M. Augk

Subscribed and sworn to before me this 512 day of May, 1982.

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### 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 JOHN K. LONG

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

- I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Research Systems Branch, Office of Nuclear Reactor Regulation.
- 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

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

My Commission expires:

My Commission Expires October 14, 1983

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

2

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF MICHAEL KALTMAN

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

- 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.
- 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.

etali

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

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

1 4

3

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF CARDIS L. ALLEN

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

- 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.
- 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. Alien

Subscribed and sworn to before me this 642 day of May , 1982.

### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

AFFIDAVIT OF SHLOMO S. YANIV, Sc.D.

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

- 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.
- 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.

Yaniv, Sc.D Shlomo S.

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

ROBERT P. ABEEN, IN. NOTARY PUBLIC STATE OF MARYLOND My Commission Expires July 1, 1982

My Commission expires: J-g 1982

4

#### 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

4

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2.

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF JOHN K. LONG

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

- I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Research Systems Branch, Office of Nuclear Reactor Regulation.
- 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.

16 JOHN K. LONG

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

Notary Public

My Commission expires:

My Commission Expires October 14, 1983

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket No. 50-537

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

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF CARDIS L. ALLEN

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

- 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.
- 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.

Tall

CARDIS L. ALLEN

Subscribed and sworn to before me this 64 day of May, 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING-BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF HOWARD B. HOLZ

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

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

BERS

Subscribed and sworn to before me this 4/1/ day of May , 1982.

Notary

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

-

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF BILL M. MORRIS

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

- 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.

1 m moni

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

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# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF RICHARD M. STARK

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

- 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.

land M. Sall

Subscribed and sworn to before me this 546 day of May, 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING-BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

2

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF CARDIS L. ALLEN

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

- 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.

1000

Cardis L. Allen

Subscribed and sworn to before me this (34 day of May, 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket No. 50-537

TENNESSEE VALLEY AUTHORITY (Clinch River Breeder Reactor Plant)

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION

# AFFIDAVIT OF RICHARD BECKER

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

- 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.

in la Buke

Subscribed and sworn to before me this 444 day of May , 1982.

Hilmy

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

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2

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF RICHARD M. STARK

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

- 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.

RICHARD

C RICHARD M. STAR

Subscribed and sworn to before me this 577 day of May , 1982.

Public

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

2

:

(Clinch River Breeder Reactor Plant) )

# AFFIDAVIT OF JOHN V. NEHEMIAS

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

- 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.
- 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.

V. helen

Subscribed and sworn to before me this 4/7 day of May , 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Jocket No. 50-537

.

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF MICHAEL KALTMAN

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

- 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.
- 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.

Subscribed and sworn to before me this 314 day of May , 1982.

Notary

My Commission expires:

# BEFORE THE ATOMIC SAFETY AND LICENSING. BOARD

#### In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

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-10

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF PAUL LEECH

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

- 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.
- 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.

Subscribed and sworn to before me this 4/7h day of May , 1982.

Public

## 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 JOHN K. LONG

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

- 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.

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

Public Notary

My Commission expires:

My Commission Expires October 14, 1983

#### 

#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF PETER B. ERICKSON

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

- 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.

B Erichan

Peter B. Erickson

Subscribed and sworn to before me this 444 day of May , 1982.

if Thursey

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

.

(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF BILL M. MORRIS

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

- 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.

Sil monori

Subscribed and sworn to before me this 572 day of May , 1982.

Keloney

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF JERRY J. SWIFT

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

- 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.
- 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.

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

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#### BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

\*

(Clinch River Breeder Reactor Plant) )

#### AFFIDAVIT OF EDWARD F. BRANAGAN, JR

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

- 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.
- 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. Brangen of

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

My Commission expires:

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF SHLOMO S. YANIV, SC.D.

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

- 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 5 - day of May, 1982.

Notary

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

My Commission expires: July ! 1982

#### 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 EILL M. MORRIS

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

- 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.

Maria

Subscribed and sworn to before me this 577 day of May, 1982.

Notary

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant) )

# AFFIDAVIT OF BILL M. MORRIS

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

- 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.

Subscribed and sworn to before me this 57 day of May, 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF JERRY J. SWIFT

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

- 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.

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

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

...

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(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF CARDIS L. ALLEN

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

- 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 f1 #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 64 day of May , 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF HOWARD B. HOLZ

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

- 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.
- 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.

LATE

Subscribed and sworn to before me this 4/7/ day of May , 1982.

All

#### 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 RICHARD BECKER

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

- 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.
- 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.

a Da Buchen

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

### 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 JOHN K. LONG

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

- I am employed by the U.S. Nuclear Regulatory Commission as a Nuclear Engineer, Research Systems Branch, Office of Nuclear Reactor Regulation.
- 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.

Subscribed and sworn to before me this 527 day of May , 1982.

Notary

My Commission expires: My Commission Expires October 14, 1983

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

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(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

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 64 day of May . 1982

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

• ...

:

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF JERRY J. SWIFT

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

- 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.
- 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.

Subscribed and sworn to before me this 314 day of May, 1982.

Notary

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF ROBLET J. DUBE

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

- 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.

Subscribed and sworn to before me this 232 day of April, 1982.

Notary

..... .undune .

ROSERT F. ADDEY, JR. NOTARY PUBLIC STATE OF MARYLAND My Commission Expires July 1, 1982

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# BEFORE THE ATOMIC SAFETY AND LICENSING- BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

.:

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF LARRY W. BELL

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

- 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.
- 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.

ARRY W. BELL

Subscribed and sworn to before me this // Hday of May, 1982.

Public My Commission expires:

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

•

(Clinch River Breeder Reactor Plant) )

# AFFIDAVIT OF JERRY J. SWIFT

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

- 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.
- 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.

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

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# BEFORE THE ATOMIC SAFETY AND LICENSING. BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF JOHN V. NEHEMIAS

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

- 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.

Webering here

Subscribed and sworn to before me this 4 7 A day of May , 1982.

Halour Notary

### 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

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(Clinch River Breeder Reactor Plant)

#### AFFIDAVIT OF BILL M. MORRIS

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

- 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.

m. morris

Subscribed and sworn to before me this 544 day of May , 1982.

My Commission expires: 7/1/82

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# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant) )

### AFFIDAVIT OF HOWARD B. HOLZ

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

- 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.

land 592

Subscribed and sworn to before me this 4/72 day of May, 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF BILL M. MORRIS

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

- 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.

Um more

Subscribed and sworn to before me this 54, day of May, 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

: ::

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF ROBERT J. DUBE

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

- 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.
- 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.

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Subscribed and sworn to before me 24 day of April, 1982. this Notary Public My Commission expires:

NOTATE PUBLIC STATE OF MARYLAND N., Commission Expires July 1, 1982

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# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

(Clinch River Breeder Reactor Plant)

# AFFIDAVIT OF CHARLES L. MILLER

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

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

ule I Mille

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

Notary

My Commission expires:

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant) )

# AFFIDAVIT OF JOHN V. NEHEMIAS

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

- 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.
- 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.

Subscribed and sworn to before me this  $1/t_h$  day of May , 1982.

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

Docket No. 50-537

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor Plant) )

# AFFIDAVIT OF LARRY W. BELL

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

- 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.
- 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

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

My Commission expires: 1

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY PROJECT MANAGEMENT CORPORATION TENNESSEE VALLEY AUTHORITY Docket No. 50-537

(Clinch River Breeder Reactor Plant)

### AFFIDAVIT OF MICHAEL KALTMAN

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

- 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.
- 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.

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Subscribed and sworn to before me this 3 4 day of April, 1982.

NO My Commission expires:

# BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In t	te	Ma	tte	r	of
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UNITED STATES DEPARTMENT OF ENERGY DOCH PROJECT MANAGEMENT CORPORATION DOCH TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

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(Clinch River Breeder Reactor Plant) )

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# AFFIDAVIT OF MICHAEL BENDER

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

- 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.
- I am employed by the Brookhaven National Laboratories as a Senior Scientist in the Medical Department.
- I am duly authorized to participate in answering the March 18, 19
   Ninth Request for Admissions pertaining to Contention 8b tenumber

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

Muhael Ben der

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MICHAEL BENDER

Subscribed and sworn to before me

this 6 day of May, 1982.

Geraldine Callister

Notary Public

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My Commission expires: March 30, 1983