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July 9, 1982

Helen F. Hoyt, Chairperson
Dr. Oscar H. Paris, Administrative Judge
Dr. Emmeth A. Luebke, Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Members of the Board:

On April 21, 1982, NECNP submitted a contention challenging the sufficiency of the Seabrook security plan. Pursuant to 10 CFR 2.790(b)(6) and Commission practice, NECNP herein presents the qualifications of two witnesses, Robert D. Pollard and Paul C. Leavitt, and requests that the Board approve their qualifications to examine the plan under a protective order. Mr. Pollard will testify on the characteristics of the plant design which make it vulnerable to sabotage, and Mr. Leavitt will address the adequacy of the security plan and the problems faced by the local police in coming to the Applicants' assistance should the plant be threatened by saboteurs.

Both Mr. Pollard and Mr. Leavitt possess the requisite "practical knowledge or its equivalent" to render them qualified to examine the security plan for Seabrook. Pacific Gas and Electric Company (Diablo Canyon Nuclear Power Plant, Units 1 and 2), 8 NRC 567 (1978). Mr. Pollard's long experience with the NRC, including his positions as Reactor Engineer and Project Manager have given him highly technical familiarity with the design of nuclear reactors. Mr. Leavitt, as ex-chief of the Hampton police department, has firsthand knowledge of the responsibilities of the Hampton police should they be called upon to deter or capture saboteurs at the plant. Mr. Leavitt has also had considerable experience with the designing and evaluation of security plans, having reviewed or developed at least fifty during his career. In addition, as police chief he handled cases of sabotage to the municipal fire

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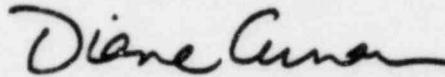
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protection and lighting systems. Mr. Leavitt has dealt with the security problems of local businesses on a daily basis for many years, concerning the designing and evaluation of plans and the handling of both internal and external sabotage. Mr. Pollard's experience was discussed in our filing of April 12, 1982. Summaries of his and Mr. Leavitt's qualifications are also attached.

NECNP is currently attempting to arrange for the assistance of another consultant who is also qualified to assess the adequacy of security plans to protect against sabotage and theft. We will present the Board with the qualifications of this witness as soon as possible.

Sincerely,



Diane Curran

Enclosures

cc: Seabrook Service List

DJC;law

ROBERT D. POLLARD
QUALIFICATIONS

Mr. Pollard is presently employed as a nuclear safety expert with the Union of Concerned Scientists, a non-profit coalition of scientists, engineers and other professionals supported by over 80,000 public sponsors.

Mr. Pollard's formal education in nuclear design began in May, 1959, when he was selected to serve as an electronics technician in the nuclear power program of the U.S. Navy. After completing the required training, he became an instructor responsible for teaching naval personnel both the theoretical and practical aspects of operation, maintenance and repair for nuclear propulsion plants. From February, 1964 to April, 1965, he served as senior reactor operator, supervising the reactor control division of the U.S.S. Sargo, a nuclear-powered submarine.

After his honorable discharge in 1965, Mr. Pollard attended Syracuse University, where he received the degree of Bachelor of Science magna cum laude in Electrical Engineering in June, 1969.

In July, 1969, Mr. Pollard was hired by the Atomic Energy Commission (AEC), and continued as a technical expert with the AEC and its successor the United States Nuclear Regulatory Commission (NRC) until February, 1976. After joining the AEC, he studied advanced electrical and nuclear engineering at the Graduate School of the University of New Mexico in Albuquerque. He subsequently advanced to the positions of Reactor Engineer (Instrumentation) and Project Manager with AEC/NRC.

As a Reactor Engineer, Mr. Pollard was primarily responsible for performing detailed technical reviews analyzing and evaluating the adequacy of the design of reactor protection systems, control systems and emergency electrical power systems in proposed nuclear facilities. In September 1974, he was promoted to the position of Project Manager and became responsible for planning and coordinating all aspects of the design and safety reviews of applications for licenses to construct and operate several commercial nuclear power plants. He served as Project Manager for the review of a number of nuclear power plants including: Indian Point, Unit 3, Comanche Peak, Units 1 and 2, and Catawba, Units 1 and 2. While with NRC, Mr. Pollard also served on the standards group, participating in developing standards and safety guides, and as a member of IEEE Committees.

PAUL C. LEAVITT
QUALIFICATIONS

Mr. Leavitt is the founder and Chief of the Department of Public Safety in the Town of Waterville, New Hampshire, the largest mountain resort community in the state of New Hampshire. Between 1955 and 1969, Mr. Leavitt served on the Hampton, New Hampshire, Police Department. Four of these years were spent as the commanding officer of the Detective Division; during the last five years, Mr. Leavitt was Chief of the Department. During his career, Mr. Leavitt has designed and evaluated at least fifty security plans for local businesses ranging from small grocery stores to large recreational operations. While he was Chief of Police, he handled two sabotage incidents in the area, involving the municipal fire protection and lighting systems.

Mr. Leavitt's educational experience includes the FBI National Academy, where he studied administration and criminal investigation; the State of New Hampshire Police Academy, where he studied general law enforcement; Northeastern University, where he studied criminal investigation, management, and police administration; and St. Anselms College, Manchester, New Hampshire, where he studied criminal investigation and criminal control procedures, as well as criminal records and criminal law.