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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD MAR 16 P3:35

In the Matter of		DOCKETING TELEVI
LOUISIANA ENERGY SERVICES, L.P.	Docket No.	70-3070-ML
(Claiborne Enrichment Center))		

APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO

CANT'S "FIRST SET OF INTERROGATORIES"

AND FIRST SUPPLEMENTAL RESPONSE TO

CANT'S INTERROGATORIES "PERTAINING TO CONTENTIONS L AND M"

Louisiana Energy Services, L.P., (Applicant) hereby files this Third Supplemental Response to Citizen's Against Nuclear Trash's ("Intervenor's") "First Set of Interrogatories," and this First Supplemental Response to Intervenor's Interrogatories "Pertaining to Contentions L and M." This combined response presents Applicant's list of proposed witnesses for safety contentions, as required by Intervenor's Interrogatories. 4

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[&]quot;Interrogatories and Request for Production of Documents Filed by Citizens Against Nuclear Trash and Directed to Louisiana Energy Services, L.P., Pertaining to Contentions A, H, I, J and K," filed April 14, 1992.

[&]quot;Interrogatories and Request for Production of Documents Filed by Citizens Against Nuclear Trash and Directed to Louisiana Energy Services, L.P., Pertaining to Contentions L and M," filed April 28, 1992.

Applicant considers the allowed safety contentions to be B-1, 4 and 5; H-2 to 7, 10, 17, 20 and 23; I-8 to 11; L; M and Q. (Applicant considers contentions I-1 to 7; J-4, 6, 9; and K to be environmental contentions.)

Intervenor's Interrogatories require Applicant to supplement its responses to include:

This list is subject to change; however, Applicant will notify Intervenor immediately should a change be necessary.

PROPOSED WITNESSES

Contention B-1, 4 and 5

Name: Mr. Bernard G. Dekker

Employer: Urenco Nederland B.V.

Business Address: Planthofsweg 7, 77601

PJ Almelo

THE NETHERLANDS

Business Phone: 011-31-5490-36124

Substance of testimony: The basis for LES decommissioning

cost estimate.

2. Name: Mr. Hugh A. Hammond

Employer: Duke Engineering & Services, Inc.

Business Address: 230 South Tryon Street

P.O. Box 1004

Charlotte, NC 28201-1004

Business Phone: (704) 382-0795

Substance of testimony: The LES decommissioning cost

estimate.

3. Name: Mr. Peter G. LeRoy

Employer: Duke Engineering & Services, Inc.

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the identity of each person expected to be called as an expert witness at any hearing, the subject matter on which he is expected to testify, and the substance of his testimony . . .

Business Address: 230 South Tryon Street

P.O. Box 1004

Charlotte, NC 28201-1004

Business Phone: (704) 382-2834

Substance of testimony: The decommissioning cost estimate

prepared, reviewed, and submitted to the NRC in accordance with NRC

regulations.

Contention H-2 to 7, 10, 17, 20 and 23

1. Name: Mr. Chris A. Andrews

Employer: Urenco Capenhurst

Business Address: Capenhurst Works, Chester

Cheshire CH1 6ER

ENGLAND

Business Phone: 011-44-51-347-3603

Substance of testimony: The proposed measures to mitigate

onsite consequences of accidents.

2. Name: Mr. Hugh A. Hammond

Employer: Same as above.

Business Address: Same as above.

Business Phone: Same as above.

Substance of testimony: The hazardous chemicals to be used

at the facility.

3. Name: Mr. Peter G. LeRoy

Employer: Same as above.

Business Address: Same as above.

Business Phone: Same as above.

Substance of testimony: The emergency plan content and the

plan prepared, reviewed, and

submitted to the NRC in accordance

with NRC regulations.

Contention I-8 to 11

1. Name: Dr. W. Howard Arnold

Employer: Louisiana Energy Services

Business Address: 2600 Virginia Avenue, N.W., Suite 608

Washington, D.C. 20037

Business Phone: (202) 467-5490

Substance of testimony: The completeness of management and

control programs.

2. Name: Mr. James R. Brackett

Employer: Duke Engineering & Services, Inc.

Business Address: 230 South Tryon Street

P.O. Box 1004

Charlotte, NC 28201-1004

Business Phone: (704) 382-0905

Substance of testimony: The completeness of Quality

Assurance program for Class I

equipment.

3. Name: Mr. Hugh A. Hammond

Employer: Same as above.

Business Address: Same as above.

Business Phone: Same as above.

Substance of testimony: The completeness of design features

for earthquakes, tornadoes, and

missiles.

4. Name: Mr. Erich F. Kraska

Employer: Urenco Investments, Inc.

Business Address: 2600 Virginia Avenue, N.W., Suite 610

Washington, D.C. 20037

Business Phone: (714) 337-6644

Substance of testimony: The completeness of the program for

surveillance and maintenance of cylinders containing tails in

interim storage.

5. Name: Mr. Peter G. LeRoy

Employer: Same as above.

Business Address: Same as above.

Business Phone: Same as above.

Substance of testimony: The completeness of the Safety

Analysis Report (SAR) and

supporting documentation and the SAR being prepared, reviewed, and submitted to the NRC in accordance

with NRC regulations.

6. Name: Mr. Ramzi G. Saaty

Employer: Fluor Daniel, Inc.

Business Address: 3333 Michelson Drite

Irvine, CA 92730

Business Phone: (714) 975-3618

Substance of testimony: The completeness of design features

for earthquakes, tornadoes, and

missiles.

7. Name: Mr. Harvey A. Wallskog

Employer: Fluor Daniel, Inc.

Business Address: 3333 Michelson Drive

Irvine, CA 92730

Business Phone: (714) 975-4787

Substance of testimony: The completeness of design features

for earthquakes, tornadoes, and

missiles.

Contention L

Each of the proposed witnesses for Contention L will provide testimony on how unlawful diversion of production of highly enriched uranium will be prevented at the CEC. (Specific information for each named witness is the same as provided above.)

1. Name: Mr. Hugh A. Hammond

2. Name: Mr. Erich F. Kraska

3. Name: Mr. Peter G. LeRoy

Contention M

Each of the proposed witnesses for Contention M will provide testimony on how employee access will be controlled to prevent production of HEU by batch recycling. (Specific information for each is the same as provided above.)

1. Name: Mr. Hugh A. Hammond

2. Name: Mr. Erich F. Kraska

3. Name: Mr. Peter G. LeRoy

Contention Q

Each of the proposed witnesses for Contention Q will provide testimony on the financial qualifications of LES to build and operate the CEC.

1. Name: Dr. W. Howard Arnold

Employer: Same as above.

Business Address: Same as above.

Business Phone: Same as above.

Name: Mr. James T. Doudiet 2.

> J.T. Doudiet Associates, Inc. Employer:

Business Address: 5800 Long Brake Trail

Minneapolis, MN 55439

Business Phone: (612) 829-7060

Name: Mr. Tarlton Long 3.

> Employer: Nationsbanc Capital Markets, Inc.

Business Address: 100 N. Tryon Street

Charlotte, NC 28255

Business Phone: (704) 386-5070

Respectfully submitted,

J. Michael McGarry, III

WINSTON & STRAWN, 1400 L Street, N.W.

Washington, D.C. 20005-3502

Attorneys for Louisiana Energy March 15, 1994

Services, L.P.

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 94 MAR 16 P3:35

In the Matter of		OFFICE OF SECRETARY
LOUISIANA ENERGY SERVICES, L.P.	Docket No.	POCKETO ME SERVICE
(Claiborne Enrichment Center)		

CERTIFICATE OF SERVICE

I hereby certify that copies of "APPLICANT'S THIRD SUPPLEMENTAL RESPONSE TO CANT'S 'FIRST SET OF INTERROGATORIES' AND FIRST SUPPLEMENTAL RESPONSE TO CANT'S INTERROGATORIES 'PERTAINING TO CONTENTIONS L AND M'" have been served on the following by deposit in the United States Mail, first class, this 15th day of March, 1994:

Morton B. Margulies, Chairman Richard F. Cole
Atomic Safety and Licensing Atomic Safety and Licensing Administrative Judge Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555 (2 copies)

Administrative Judge Frederick J. Shon Atomic Safety and Licensing Poard U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Office of Commission Appellate The Holler, isq. Adjudication U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Administrative Judge Board U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Secretary of the Commission U.S. Nuclear Regulatory Commission Washington D-C 20555 Attention: Cale! Dometing and Service Section (Wriginal pluy 3 hopies)

office of the General Counsel W.S. Nuclear Regulatory Commission Washington, D.C. 20555

Ronald Wascom, Deputy Assistant Joseph DiStefano Secretary Office of Air Quality & Louisiana Energy Services, L.P. 2600 Virginia Avenue, N.W. Radiation Protection Suite 610 P.O. Box 82135 Washington, D.C. 20037 Baton Rouge, LA 70884-2135 Peter G. LeRoy Marcus A. Rowden Duke Engineering and Services, Fried, Frank, Harris, Shriver & Jacobsen Inc. 230 South Tryon Street 1101 Pennsylvania Avenue, N.W. Suite 900 South P.O. Box 1004 Charlotte, NC 282' 04 Washington, D.C. 20004 Diane Curran Nathalie Walker Harmon, Curran, Gallagher & Sierra Club Legal Defense Fund Spielberg 400 Magazine St. 6935 Laurel Avenue, Suite 204

Adjudicatory File Atomic Safety and Licensing Board Panel U.S. Nuclear Regulatory Commission Washington, D.C. 20555

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UISIANA ENERGY SERVICES, L.P.

John A. MacEvoy

WINSTON & STRAWN, ATTORNEYS FOR LOUISIANA ENERGY SERVICES, L.P.

March 15, 1994