

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 )

Docket No. 50-537

(Clinch River Breeder Reactor Plant) )

AFFIDAVIT OF PAUL LEECH  
ON CONTENTION 7 (a) (1)

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

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager in the Clinch River Breeder Reactor Program Office.
2. A statement of my professional qualifications is attached.
3. I, or Staff members reporting to me, am responsible for preparation of those portions of the draft CRBR FES Supplement which address the ability of CRBR to meet LMFBR program timing objectives.
4. In 1977 the time objective for achieving criticality at the CRBR was for late 1983.
5. Under the DOE's Final Environmental Impact Statement for the LMFBR program (DOE/EIS-0085-FS), the timing objective for achieving criticality of CRBR is to complete the plant "as expeditiously as possible".

6. At this late date no alternative breeder reactor proposal could be developed and implemented that would meet the timing objective in Paragraph 5, above.
7. Based on the above, I believe that Intervenors' concern that Applicants and Staff have not adequately demonstrated how CRBR will achieve the objectives in the LMFBR program impact statement and its supplement in a timely fashion has been superseded by changes in the timing objective as given in the supplement to the LMFBR programmatic statement.

*Paul H. Leech*

Paul Leech

Subscribed and sworn to before me  
this 8 day of September, 1982.

*Edythe S. Becker*

Notary Public

My Commission expires: *July 1, 1986*

PAUL H. LEECH

PROFESSIONAL QUALIFICATIONS

I am presently employed by the U. S. Nuclear Regulatory Commission as a Project Manager in the Clinch River Breeder Reactor Program Office of the Office of Nuclear Reactor Regulation. My specific responsibility is to manage the NRC's environmental review of the application to the Commission for a permit to construct the Clinch River Breeder Reactor Plant near Oak Ridge, Tennessee. I had that same responsibility during 1975-1977.

My formal education was obtained at: San Jose (California) State College (pre-engineering, 1939-40); University of Colorado, Boulder, Colorado (B. S. degree in Electrical Engineering, 1943); and Columbia University, New York City (courses in psychology, world trade, literature). Short courses sponsored by various employers included the following subjects: electrical design; management, underground power transmission; ecosystems; nuclear power and environmental assessment; environmental quality and natural resources; PWR Technology.

After graduation from the University of Colorado, my initial experience was predominantly in the application and sale of electrical apparatus, analyzing and reporting technical developments and experience in the electric utility industry, and analysis of the environmental effects of all types of power plants and power transmission and distribution systems.

Beginning in 1945, I was employed for 13 years by the General Electric Company in various assignments related to the design of electrical products and their applications in industry.

Beginning in 1959, I was employed for eleven years as the Western Editor of Electrical World, a technical trade magazine published by McGraw-Hill for the electric utility industry. In this capacity I specialized in the fields of electric power transmission and distribution, system engineering and power generation.

During 1971, I was employed for eight months in the Bechtel Corporation Power and Industrial Division as a senior engineer concerned primarily with environmental effects of nuclear power plants. In September of that year I left Bechtel to accept a position with the Atomic Energy Commission's Office of Regulation (now the Nuclear Regulatory Commission).

I have served the Commission primarily as an environmental project manager for preparation of environmental statements on various applications for construction permits and operating licenses for nuclear power plants, including: Fort Calhoun Station near Omaha, Nebraska; Millstone Power Station at Waterford, Connecticut; Surry Power Station and North Anna Power Station in Virginia; Skagit Nuclear Power Station in Washington; and the Sundesert Nuclear Plant near Blythe, California. I was also the environmental project manager for preparation of the Programmatic Environmental Impact Statement related to decontamination and disposal of radioactive wastes resulting from the March 28, 1979 accident at Three Mile Island Nuclear Station Unit 2. In addition, I served briefly as the licensing project manager for review of the Pebble Springs Nuclear Plant in the State of Oregon.

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(Clinch River Breeder Reactor  
Plant)

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Docket No. 50-537

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF MOTION FOR SUMMARY DISPOSITION OF INTERVENORS' CONTENTIONS" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 29th day of September, 1982:

Marshall Miller, Esq., Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555 \*

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Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555 \*

Dr. Cadet H. Hand, Jr., Director  
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Alan Rosenthal, Esq., Chairman  
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U.S. Nuclear Regulatory Commission  
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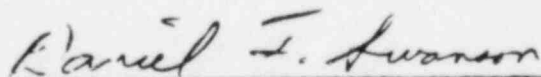
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Washington, D.C. 20585

Atomic Safety and Licensing Appeal  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555 \*

Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555 \*

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555 \*



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Daniel T. Swanson  
Counsel for NRC Staff