

RELATED CORRESPONDENCE



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)	
PACIFIC GAS AND ELECTRIC COMPANY)	Docket No. 50-275 O.L.
Diablo Canyon Nuclear Power Plant)	Docket No. 50-323 O.L.
Units Nos. 1 and 2)	(Reopened Hearing --
)	Design Quality
)	Assurance)

MOTION TO COMPEL
ANSWERS TO INTERROGATORIES
TO JOINT INTERVENORS

Pursuant to 10 CFR § 2.740(f)(1), Licensee moves the presiding member of this board, and members thereof for an order compelling Joint Intervenor to answer the interrogatories set forth below. The Interrogatories to Joint Intervenor were served by Licensee on June 10, 1983 and were responded to by Joint Intervenor by service by mail on June 27, 1983.

Without obtaining a protective order pursuant to 10 CFR 2.740(f)(1), Joint Intervenor objected to and failed

1 to answer, or answered in an unresponsive manner, a majority
2 of the interrogatories propounded to them.

3 In Pennsylvania Power and Light Company and
4 Alleghany Electric Cooperative, Inc. (Susquehanna Steam
5 Electric Station Units 1 and 2), ALAB-613, 12 NRC 317
6 (1980), the Atomic Safety and Licensing Appeal Board
7 discussed in great length the discovery responsibilities of
8 an intervenor in the regulatory process. As noted by the
9 Board,

10 ". . . Discovery is the descriptive term
11 for procedures available to help liti-
12 gants learn the nature of an adversary's
13 case in advance of trial. . . . An
14 important reason for allowing discovery
15 is to eliminate, so far as possible, the
16 element of surprise in modern litiga-
17 tion. The underlying concept is to
18 shorten the actual trial, with its
19 attendant expense and inconvenience for
20 all concerned, while increasing the
21 parties' ability to develop a complete
22 record for decisional purposes." 12 NRC
23 at 322.

18 As can be seen from the responses to the interrogatories
19 propounded by the Licensee, the Joint Intervenors have
20 totally disregarded their responsibilities in the discovery
21 process and have sought to undermine the preparation for and
22 the conduct of an expeditious hearing in this matter.

23 INTERROGATORIES

24 1. As to each person employed by PG&E, Bechtel,
25 the PG&E/Bechtel "Project", or any of those entities'
26 subcontractors working on Diablo Canyon that you have had

1 communication with since November 21, 1981, regarding Diablo
2 Canyon, state:

3 (a) The name of each employee or representa-
4 tive with whom you have communicated. (This interrogatory
5 is not intended to cover any administrative communications
6 regarding announced meetings between the NRC Staff and/or
7 the IDVP and/or PG&E).

8 (b) The name of each person involved on your
9 behalf in each communication.

10 (c) The date of each such communication.

11 (d) How the communication was made, i.e.,
12 whether by telephone, written instrument, personal meeting,
13 or otherwise.

14 (e) Who initiated each such communication.

15 (f) The substance of information exchanged
16 during each such communication.

17 Response to Interrogatory No. 1:

18 Joint Intervenors object to this interrogatory on
19 the ground that it is overly broad, burdensome and
20 oppressive, and not reasonably calculated to lead to the
21 discovery of relevant or admissible evidence, and it calls
22 for privileged information (e.g., attorney work product;
23 informant). In addition, the information requested is fully
24 available to the Applicant at any time since the subject
25 employees are employed by the Applicant or its contractors.

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1 Thus, the requested information can be obtained simply by
2 asking the employees themselves.

3 Argument

4 Other than the portion of the answer claiming
5 privileges this objection is merely a general objection.
6 General objections of this nature are insufficient to
7 support an objection to a discovery request.

8 As noted by the Board in Pennsylvania Power,
9 supra,

10 "It is not proper for a party to
11 ignore a discovery request. Interroga-
12 tories, for example, must either be
13 answered or objected to in the time
14 allowed. 10 CFR 2.740b(b). Objections
15 may be accompanied by a motion for a
16 "protective order" to modify or elimi-
17 nate the obligation to respond, but the
18 movant must establish "good cause" for
19 issuing such an order. 10 CFR 2.740(c).
20 And as in judicial practice, general
21 objections do not provide that cause.
22 Challenges to interrogatories must be

23 'specific enough so that the
24 [tribunal] can understand in
25 what way the interrogatories
26 are claimed to be objection-
able. General objections,
such as the objection that the
interrogatories will require
the party to conduct research
and compile data, or that they
are unreasonably burdensome,
oppressive, or vexatious, or
that they seek information
that is as easily available to
the interrogating as to the
interrogated party, or that
they would cause annoyance,
expense, and oppression to the
objecting party without serv-
ing any purpose relevant to

1 the action, or that they are
2 duplicative of material al-
3 ready discovered through depo-
4 sitions, or that they are ir-
5 relevant and immaterial, or
6 that they call for opinions
and conclusions, are insuffi-
cient.' (Citing 4A Moore's
Federal Practice (1980 ed).
¶ 33.27 (at pp. 33-151 and
33-152.)" 12 NRC at 322-323.

7 Since the Intervenor's have not articulated any specific
8 objection other than the alleged privileges the general
9 objections must be disregarded in a determination of the
10 necessity of their responding to this interrogatory.

11 The claims of privilege made by the Intervenor's
12 have less basis than the general objections made above.

13 The work-product privilege applies only to the
14 discovery of documents and tangible things. 10 C.F.R.
15 § 2.740(b)(2); See, Wright & Miller, Federal Practice and
16 Procedure: Civil § 2024. It does not protect the identity
17 of individuals, the dates of communications, the manner of
18 contact or the substance of the communication such as sought
19 in this interrogatory. See, Lincoln Gateway Realty Co. v.
20 Carri-Craft, Inc. 53 F.R.D. 303 (1971). While the privilege
21 does protect against the disclosure of the mental
22 impressions, conclusions, opinions or legal theories of an
23 attorney, nothing in Interrogatory No. 1 even remotely
24 requests such information. As a result the claim of work
25 product privilege must fail.

26 ///

1 Finally, the Joint Intervenors claim the shield of
2 the informants privilege to preclude responding to this
3 interrogatory. While it is true that protection of
4 informants has the full support of the Commission, by
5 definition, one can only be an informant if one provides
6 information to a governmental agency. See, Houston
7 Lighting & Power Company, ALAB-639, 13 NRC 469 (1981). The
8 Joint Intervenors are clearly not a governmental agency.
9 Therefore, the informant's privilege has no application to
10 the information requested in Interrogatory No. 1.

11 5. Identify each and every structure at Diablo
12 Canyon that you believe to be "important-to-safety", but
13 which is not classified as design Class I. As to each such
14 structure identified, state:

15 (a) The bases for your opinion that the
16 structure should be considered "important-to-safety".

17 (b) Each regulation which, in your opinion,
18 requires each such structure to be classified as
19 "important-to-safety".

20 (c) The date upon which each such regulation
21 required each such structure to be so classified.

22 Response to Interrogatory No. 5:

23 To the extent that this interrogatory requests
24 identification of each individual structure that is
25 "important to safety" but not Class I, Joint Intervenors
26 object to this interrogatory as overly broad, burdensome and

1 oppressive, and not reasonably calculated to lead to the
2 discovery of relevant or admissible evidence. Without
3 waiving such objections, Joint Intervenor's state that they
4 are unable to provide the information requested because the
5 Applicant's FSAR for Diablo Canyon fails to distinguish
6 between structures that are "important to safety" and
7 structures that are "safety-related." Those terms are
8 apparently used interchangeably by the Applicant.

9 Argument

10 As noted above general objections of the type made
11 in the first sentence of the Joint Intervenor's response are
12 not a sufficient basis upon which to refuse to answer.

13 The remainder of the response is simply
14 unresponsive to the interrogatory. The interrogatory
15 clearly requests the Intervenor's to state their belief
16 concerning structures at Diablo "important-to-safety" but
17 not classified as design Class I. The characterization of
18 structures by the Licensee in its FSAR has absolutely no
19 relevance to this interrogatory.

20 This interrogatory is designed to determine the
21 Intervenor's basis for the positions they have asserted
22 concerning structures "important-to-safety." In order to
23 prepare for its case Licensee needs to know the structures
24 claimed by the Joint Intervenor's to be "important-to-
25 safety." Information necessary to the preparation of one's
26 case is discoverable. In re Folding Carton Anti-Trust Case

1 83 F.R.D. 256 (N.D.Ill. 1979); Flour Mills of America v.
2 Pace 75 F.R.D. 676 (E.D.Okla. 1977); See, 4 Moore's Federal
3 Practice Section 33.14.

4 6. Identify specifically each and every system
5 at Diablo Canyon that you believe to be "important-to-
6 safety", but which is not classified as design Class I. As
7 to each such system identified, state:

8 (a) The bases for your opinion that each
9 such system should be considered "important-to-safety".

10 (b) Each regulation which, in your opinion,
11 requires each such system to be classified as
12 "important-to-safety".

13 (c) The date upon which each such regulation
14 required each such system to be so classified.

15 Response to Interrogatory No. 6:

16 To the extent that this interrogatory requests
17 identification of each individual system that is "important
18 to safety" but not Class I, Joint Intervenors object to this
19 interrogatory as overly broad, burdensome and oppressive,
20 and not reasonably calculated to lead to the discovery of
21 relevant or admissible evidence. Without waiving such
22 objections, Joint Intervenors state that they are unable to
23 provide the information requested because the Applicant's
24 FSAR for Diablo Canyon fails to distinguish between systems
25 that are "important to safety" and systems that are
26 ///

1 "safety-grade." Those terms are apparently used
2 interchangeably by the Applicant.

3 Argument

4 The arguments to compel discovery of the
5 information sought by Interrogatory No. 6 are the same as
6 those made in support of the argument to compel the answers
7 to No. 5 and are incorporated herein by reference.

8 7. Identify specifically each and every
9 component at Diablo Canyon that you believe to be
10 "important-to-safety", but which is not classified as design
11 Class I. As to each such component identified, state:

12 (a) The bases for your opinion that each
13 such component should be considered "important-to-safety".

14 (b) Each regulation which, in your opinion,
15 requires each such component to be classified as
16 "important-to-safety".

17 (c) The date upon which each such regulation
18 required each such component to be so classified.

19 Response to Interrogatory No. 7:

20 To the extent that this interrogatory requests
21 identification of each individual component that is
22 "important to safety" but not Class I, Joint Intervenor
23 object to this interrogatory as overly broad, burdensome and
24 oppressive, and not reasonably calculated to lead to the
25 discovery of relevant or admissible evidence. Without
26 waiving such objections, Joint Intervenor state that they

1 are unable to provide the information requested because the
2 Applicant's FSAR for Diablo Canyon fails to distinguish
3 between components that are "important to safety" and
4 components that are "safety-grade." Those terms are
5 apparently used interchangeably by the Applicant.

6 Argument

7 The arguments to compel discovery of the
8 information sought by Interrogatory No. 7 are the same as
9 those made in support of the argument to compel the answers
10 to Nos. 5 and 6 and are incorporated herein by reference.

11 13. Mr. Hubbard, in his affidavits and/or his
12 declaration uses the following terms:

- 13 (a) "safety-significance"
- 14 (b) "errors"
- 15 (c) "deficiencies"
- 16 (d) "safety implications"
- 17 (e) "design QA"
- 18 (f) "safety hazard"
- 19 (g) "quality control"
- 20 (h) "root cause"
- 21 (i) "basic cause"
- 22 (j) "QA breakdown"
- 23 (k) "extreme likelihood"
- 24 (l) "major errors"
- 25 (m) "rigorous and thorough design
26 verification program"
- (n) "design product"
- (o) "minor QA breakdown"
- (p) "QA finding"
- (q) "QA observation"

23 As to each term, please:

- 24 (a) Give your definition of the term.
- 25 (b) Identify the regulation or other source
26 upon which you base your definition.

1 (c) Give your explanation of the difference
2 between "safety-significance" and the terms
3 "important-to-safety" and "safety-related".

4 (d) Give your explanation of the difference
5 between "major errors" and "errors".

6 (e) Give your explanation of the difference
7 between "deficiencies" and "errors".

8 (f) Give your explanation of the difference
9 between a "QA breakdown" and a "major QA breakdown".

10 (g) Give your explanation of the difference
11 between a "QA breakdown" and a "QA finding".

12 (h) Give your explanation of the difference
13 between a "QA breakdown" and a "QA observation".

14 Response to Interrogatory No. 13:

15 Joint Intervenor object to this interrogatory on
16 the ground that Mr. Hubbard is not employed by the Joint
17 Intervenor, and thus the request should be directed either
18 to Mr. Hubbard or to the Governor of California. To the
19 extent that this interrogatory calls for the Joint
20 Intervenor's definition of 'terms used by Mr. Hubbard', Joint
21 Intervenor object that such information is irrelevant and
22 not reasonably calculated to lead to the discovery of
23 relevant or admissible evidence. Without waiving such
24 objections, Joint Intervenor supply the following
25 responses:

26 ///

1 (a), (b). The following definitions are based on
2 standard English usage as expressed in Webster's New
3 Collegiate Dictionary:

4 (1) "safety-significance": that which is materially
5 relevant to safety;

6 (2) "errors": acts or beliefs which involve a
7 departure from accuracy; mistakes; discrepancies;
8 deficiencies;

9 (3) "deficiencies": acts or states of being which are
10 inadequate in scope or extent to comply with a specified
11 program or to accomplish a specified objective;

12 (4) "safety implications": that which has import or
13 relevance with respect to a condition of safety;

14 (5) "design QA": see 10 C.F.R. Part 50, Appendix B,
15 Introduction, as applied to the design process;

16 (6) "safety hazard": a condition or state of being
17 which imposes or threatens to impose a danger of harm.

18 (7) "quality control": see 10 C.F.R. Part 50,
19 Appendix B, Introduction;

20 (8) "root cause": an occurrence or state of being
21 which accurately could be characterized as having been the
22 precursor to a specific result or condition;

23 (9) "basic cause": an occurrence or state of being
24 which accurately could be characterized as having been the
25 necessary precursor to a specific result or condition;

26 ///

1 (10) "QA breakdown": the failure of a program, action
2 or series of actions designed or intended to provide
3 adequate confidence that a structure, system, or component
4 will perform satisfactorily in service;

5 (11) "extreme likelihood": a condition of being which
6 strongly militates towards a specified result.

7 (12) "major errors": mistakes of material significance
8 which are extreme in character.

9 (13) "rigorous and thorough design verification
10 program": a program as described in Response to
11 Interrogatory No. 21 infra;

12 (14) "design product": the ability of a program of
13 quality assurance to attain certain levels of performance
14 and safety.

15 (15) "minor QA breakdown": a potentially damaging but
16 relatively less significant failure to comply with a program
17 as described in subparagraph (10) above;

18 (16) "QA finding": an error, deficiency, discrepancy,
19 or other failure to comply with a prescribed QA program;

20 (17) "QA observation": the gathering of data or
21 conclusion of fact as a result of inquiry mandated by a
22 program or system designed to monitor and assure certain
23 levels of performance.

24 (c) The term "safety-significance" differs from the
25 term "important to safety" and "safety-related" insofar as

26 ///

1 the latter have specific meanings as outlined in Response to
2 Interrogatory No. 4, supra.

3 (d) See answers 13(a)(2) and 13(a)(12) above.

4 (e) See answers 13(a)(2) and 13(a)(3) above.

5 (f) The term "major QA breakdown" refers to the
6 occurrence of a more serious failure to comply with
7 prescribed QA requirements or procedures than does the term
8 "QA breakdown."

9 (g) See answers 13(a)(10) and 13(a)(16).

10 (h) See answers 13(a)(10) and 13(a)(17).

11 Argument

12 The arguments as to general objections made above
13 are incorporated herein by reference.

14 While it may be true that Mr. Hubbard is no longer
15 employed by Joint Intervenors the original Motion to Reopen
16 filed by the Joint Intervenors on June 7, 1982 had attached
17 thereto a one hundred and one page affidavit with thirty
18 exhibits prepared by Mr. Hubbard. The Joint Intervenors
19 have continued to rely upon this affidavit in the myriad of
20 other pleadings filed in this proceeding.

21 If the Joint Intervenors no longer intend to rely
22 upon Mr. Hubbard and his definition of those terms then the
23 Licensee is entitled to know this. If on the other hand
24 these are definitions the Joint Intervenors intend to rely
25 upon then the definitions are clearly discoverable to assist
26 in the preparation of the Licensee's case. Folding Carton,

1 supra. It is interesting to note that the Governor, in his
2 response to Licensee's interrogatories, claims no
3 responsibility for anything prior to January 3, 1983. Mr.
4 Hubbard's June 7, 1982 affidavit is apparently being
5 disavowed by both Joint Intervenors and the Governor.
6 Unfortunately, Licensee is left with no answers to which it
7 can turn in preparation for hearing.

8 14. List each ITR, with revision number, that you
9 have reviewed to date. As to each ITR, state specifically:

10 (a) Each fact stated therein with which you
11 disagree.

12 (b) The specific page(s) of each ITR where
13 the fact(s) set forth in your answer to 14(a) is located.

14 (c) Each conclusion or opinion stated
15 therein with which you disagree.

16 (d) The specific page(s) of each ITR where
17 the conclusion(s) or opinion(s) set forth in your answer to
18 14(c) is located.

19 (e) The specific bases for your disagreement
20 with each such fact, conclusion or opinion.

21 Response to Interrogatory No. 14:

22 Joint Intervenors object to this interrogatory as
23 vague and ambiguous, overly broad, burdensome, oppressive,
24 and not reasonably calculated to lead to the discovery of
25 relevant or admissible evidence. Without waiving such
26 objections, Joint Intervenors state that given the

1 significant number of ITRs, the cryptic manner in which they
2 are written, the complexity of the subjects being reviewed,
3 and the fact that Joint Intervenors' review of the ITRs is
4 continuing and not yet complete, they are unable to respond
5 to this interrogatory at this time.

6 Argument

7 The arguments as to general objections made above
8 are incorporated herein by reference.

9 While it may be true that the Joint Intervenors
10 have not totally completed their review of the ITRs at this
11 time, it is highly unlikely, if not outright fraudulent for
12 them to claim that they have not reached opinions on
13 portions of some ITRs. This response clearly indicates an
14 attempt on the part of the Joint Intervenors to delay the
15 discovery process with the resultant effect of delaying the
16 hearing. If, at this late date, Joint Intervenors, or, for
17 that matter, the Governor, are unable to identify even one
18 single conclusion or statement of fact from even one single
19 ITR with which they disagree, it is respectfully submitted
20 that a hearing is patently unnecessary.

21 15. With respect to the PG&E Phase I Final
22 Report, identify:

23 (a) Each fact stated therein with which you
24 disagree.

25 (b) The specific page(s) of the Report where
26 the fact(s) set forth in your answer to 15(a) is located.

1 (c) Each conclusion or opinion stated
2 therein with which you disagree.

3 (d) The specific page(s) of the Report where
4 the conclusion(s) or opinion(s) set forth in your answer to
5 15(c) is located.

6 (e) The specific bases for your disagreement
7 with each such fact, conclusion or opinion.

8 Response to Interrogatory No. 15:

9 Joint Intervenors object to this interrogatory as
10 vague and ambiguous, overly broad, burdensome, oppressive,
11 and not reasonably calculated to lead to the discovery of
12 relevant or admissible evidence. Without waiving such
13 objections, Joint Intervenors state that given the size of
14 the Final Report, the complexity of the subjects reviewed,
15 and the fact that Joint Intervenors' review of the Phase I
16 Final Report is continuing and not yet complete, they are
17 unable to respond to this interrogatory at this time.

18 Argument .

19 The arguments as to general objections made above
20 are incorporated herein by reference.

21 While it may be true that the Joint Intervenors
22 have not completed their review of the PGandE Phase I Final
23 Report at this time, it is highly unlikely that they have
24 not completed reviews of some portions of the PGandE Phase I
25 Final Report which have been available for many months.
26 This response clearly indicates an attempt on the part of

1 the Joint Intervenor to delay the discovery process with
2 the natural effect being to delay the hearing date. As
3 stated in the preceding argument, it is inconceivable that
4 Joint Intervenor have no negative opinions regarding the
5 Final Report at this time.

6 16. State specifically all direct personal
7 knowledge that you have regarding:

8 (a) The design of Diablo Canyon.

9 (b) The design quality assurance programs
10 for Diablo Canyon.

11 (c) How such direct personal knowledge was
12 acquired.

13 Response to Interrogatory No. 16:

14 Joint Intervenor have direct knowledge only of
15 items viewed during site tours of the Diablo Canyon Nuclear
16 Power Plant.

17 Argument

18 This interrogatory asks a foundational question
19 concerning direct personal knowledge of the Joint
20 Intervenor. It goes directly to the competency of
21 potential witnesses of the Joint Intervenor. Rather than
22 provide the information requested the response merely
23 alludes to items viewed during site tours.

24 The interrogatory is not difficult. If the Joint
25 Intervenor have direct personal knowledge of the design of
26 Diablo Canyon and/or the design quality assurance programs,

1 then the Licensee is entitled to know it. If the Joint
2 Intervenors have no such knowledge, then the Licensee is
3 entitled to know.

4 18. In paragraph 9 of the Hubbard affidavit
5 attached to Joint Intervenors' Motion to Reopen of June 7,
6 1982, Mr. Hubbard lists categories of items that he
7 reviewed. Identify specifically:

8 (a) The industry QA/QC standards prior to
9 1970 that Mr. Hubbard reviewed.

10 (b) The "regulatory developments" examined.

11 (c) All documents examined by Mr. Hubbard in
12 his examination of the NRC's implementation of QA/QC
13 regulations.

14 Response to Interrogatory No. 18:

15 See Response to Interrogatory No. 17(a).

16 Argument

17 The arguments made in support of the motion to
18 compel the answer to Interrogatory No. 13 are incorporated
19 herein by reference.

20 23. Identify specifically each document upon
21 which you rely as support for your contentions or positions
22 as stated in your answers to these interrogatories. As to
23 each such document, identify the precise portion relied upon
24 as to each such contention or position.

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26 ///

1 Response to Interrogatory No. 23:

2 The documents relied upon include, but are not
3 necessarily limited to, those documents referred to in or
4 attached as exhibits to Joint Intervenor's June 7, 1982
5 Motion; Joint Intervenor's May 10, 1982 Motion; Joint
6 Intervenor's May 31, 1983 Response to Motion of Governor
7 Deukmejian to Reopen the Record on Construction Quality
8 Assurance; and the various affidavits of Richard B. Hubbard,
9 each of which has been filed in this proceeding. As Joint
10 Intervenor's review of the documents issued by the IDVP,
11 DCP, and NRC progresses, the foregoing list will obviously
12 increase.

13 Argument

14 The purpose of pretrial discovery in complex
15 litigation is to enable parties to ascertain facts, refine
16 the issues and prepare adequately for a more expeditious
17 hearing. Pennsylvania Power, supra. As this Board is well
18 aware there are literally thousands of documents which
19 contain information about the upcoming hearings.

20 This interrogatory is designed to focus in on
21 those documents which the Joint Intervenor's specifically
22 intend to rely upon at the hearings. This will assist in
23 the preparation of the Licensee for the hearing by
24 eliminating unnecessary preparation and enable the Licensee
25 to concentrate on those areas upon which the Joint
26

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1 Intervenor's rely. Clearly, this information is
2 discoverable.

3 CONCLUSION

4 In the absence of a motion for a protective order
5 the Board may not excuse failures to respond to discovery
6 regardless of how objectionable the discovery may be.
7 Illinois Power Company, LBP-81-61, 14 NRC 1735 (1981).
8 General objections such as those contained throughout the
9 responses of the Joint Intervenor's are insufficient to
10 provide good cause not to respond. Pennsylvania Power,
11 supra. Finally, the obvious attempt by the Joint
12 Intervenor's to avoid their discovery responsibilities by
13 making unfounded objections and failing to fully respond to
14 the interrogatories propounded by the Licensee leaves this

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16 ///

17 ///

1 Board no alternative but to grant the Licensee's motion to
2 compel.
3

4 Respectfully submitted,

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DATED: July 12, 1983.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
PACIFIC GAS AND ELECTRIC COMPANY)
)
Diablo Canyon Nuclear Power Plant,)
Units 1 and 2)

Docket No. 50-275
Docket No. 50-323



CERTIFICATE OF SERVICE

The foregoing document(s) of Pacific Gas and Electric Company has (have) been served today on the following by deposit in the United States mail, properly stamped and addressed:

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US Nuclear Regulatory Commission
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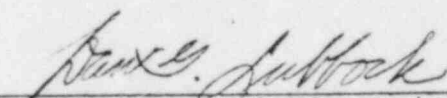
Judge Thomas S. Moore
Chairman
Atomic Safety and Licensing
Appeal Board
US Nuclear Regulatory Commission
Washington DC 20555

Judge W. Reed Johnson
Atomic Safety and Licensing
Appeal Board
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Judge John H. Buck
Atomic Safety and Licensing
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