

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA

DOCKETED  
USNRC

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

PACIFIC GAS AND ELECTRIC COMPANY )

(Diablo Canyon Nuclear Power )  
Plant, Units 1 and 2) )

Docket Nos. 50-275 O.L.  
50-323 O.L.

JOINT INTERVENORS' THIRD SUPPLEMENTAL  
RESPONSE TO PG&E'S FIRST SET OF INTERROGATORIES

REPOSENSE TO INTERROGATORY NO. 2:

The Joint Intervenors now intend to call as an expert witness at the reopened hearings on design quality assurance Dr. Peter Kempthorne, Assistant Professor, Department of Statistics, Harvard University. A copy of his resume is attached. He will testify regarding the applicability of statistics to verification of design generally and to the Diablo Canyon design specifically. He has not testified previously in any NRC or legal proceeding regarding such subject matters. The documents upon which he will rely include, but are not necessarily limited to, the IDVP Program Management Plans for

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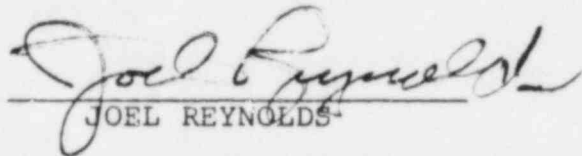
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Phases I and II, the IDVP Final Report, certain of the ITR's  
issued by the IDVP, and the general statistical literature.

DATED: September 23, 1983 Respectfully submitted,

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By   
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employment  
7/82-

HARVARD UNIVERSITY - DEPARTMENT OF STATISTICS

Cambridge, MA

Assistant Professor (1/83- ), Instructor (7/82-12/82).

Courses: statistical inference, elementary statistics,  
consulting in statistics, probability theory, regression  
and analysis of variance, multivariate analysis.

Research: variable selection in model building, compromise  
decision making, theory and practice of model fitting,  
statistical decision theory.

Consulting: Dominican fishery project, with Dr. J. Wylie(Cornell).

9/79-6/82

UNIVERSITY OF CALIFORNIA - DEPARTMENT OF STATISTICS

Berkeley, CA

Instructor: taught elementary statistics course.

Statistical consultant: consulted on a short-term basis  
with members of the university and local businesses.

Research assistant: programmed under Dept. of Energy contract.

Teaching assistant: led sections of courses on multivariate  
analysis, statistical computing, and elementary statistics.

6/81-2/82

ANALYSIS AND INFERENCE, INC.

Boston, MA

Statistical consultant: prepared the experimental design and  
analyzed the results of a confirmatory study on truck  
performance for New York City; designed and coded computer  
programs for a simulation of an insurance claims generation  
process where the number of accidents follows a Poisson regression  
model; developed a probability model of jury decisionmaking.

6/78-9/78

IBM - CAMBRIDGE SCIENTIFIC CENTER

Cambridge, MA

Analyst/programmer: developed techniques to extend APL to handle  
sparse arrays. Presented oral reports to the APL Development  
Group at the Yorktown Research Facility and the Cambridge Center.

education

9/79-6/82

UNIVERSITY OF CALIFORNIA

Berkeley, CA

Ph.D. in Statistics.

Thesis: Variable Selection and Parameter Estimation in  
Normal Linear Regression Models.

President of the Statistics Graduate Students Association.

Delegate to the Graduate Assembly.

10/78-9/79

IMPERIAL COLLEGE, UNIVERSITY OF LONDON

London, England

M.Sc. in Statistics.

Thesis: An Analysis of the M.D.A. Breast Cancer Study.

Diploma of Imperial College Award.

9/74-6/78

HARVARD COLLEGE

Cambridge, MA

A.B. magna cum laude in Applied Mathematics.

Harvard Scholarship.

Phi Beta Kappa.

References available upon request.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

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(Diablo Canyon Nuclear Power	)	
Plant, Units 1 and 2)	)	
	)	
	)	

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of September, 1983, I have served copies of the foregoing JOINT INTERVENORS' THIRD SUPPLEMENTAL RESPONSE TO PG&E's FIRST SET OF INTERROGATORIES, mailing them through the U.S. mails, first class, postage prepaid.

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