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RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'95 DEC -4 P2:56

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Charles Bechhoefer, Chairman
Dr. Jerry R. Kline
Dr. Peter S. Lam

In the Matter of)	
GEORGIA INSTITUTE OF TECHNOLOGY)	
Atlanta, Georgia)	Docket No. 50-160-Ren
Georgia Tech Research Reactor)	ASLBP NO. 95-710-01-Ren
Renewal of License No. R-97)	

GEORGIA INSTITUTE OF TECHNOLOGY'S INTERROGATORIES
REQUEST FOR PRODUCTION OF DOCUMENTS TO GANE

Licensee Georgia Institute of Technology ("Georgia Tech") propounds its Interrogatories and Request for Production of Documents to GANE and requests that responses to these Interrogatories be served upon Georgia Institute of Technology by December 15, 1995.

All interrogatories refer to GANE Contention 9 regarding management of the Georgia Tech Research Reactor ("GTRR").

1. Please identify each aspect of the management organization or structure, operations, supervision, budgetary functions, or otherwise which you contend serves as a basis for the denial of renewal by the NRC of Georgia Tech's license.
2. Please identify and describe all facts in your

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possession or control or within your knowledge which supports each of the aspects of management listed in response to Interrogatory no. 1.

3. Please identify and describe all documents in your possession or control or within your knowledge which supports each of the aspects of management listed in response to Interrogatory no. 1.

4. Please identify, giving name, address, and business and home telephone numbers, each person having knowledge of the aspects of management identified by you in response to Interrogatory no. 1 above.

5. Identify any person GANE presently intends to call as a witness in this proceeding to testify regarding this contention. For each such person, please state:

- a. name, address, business and home telephone number;
- b. place of employment, title; and education;
- c. whether such individual was at any time an employee of Georgia Tech.

6. If GANE expects to call an expert witness to testify on its behalf, please provide the following information:

- a. name, address, business and home telephone number;
- b. place of employment, title, education;
- c. professional experience;
- d. the subject matter on which the expert will testify
- e. the substance of the facts and opinions as to which the

expert is expected to testify;

f. a summary of the grounds for each opinion.

7. Identify all documents which GANE intends to admit into evidence at the hearing of this case.

8. Identify the specific NRC regulation which you contend has been violated or is currently being violated by Georgia Tech.

9. Provide all information and produce copies of all documents in your possession which document or describe in any manner any incidents or problems involving the GTRR which have occurred from 1998 to the present, which GANE contends demonstrate significant, serious, or continuing management problems at Georgia Tech.

10. State whether GANE contends that the corrective actions taken by the Licensee following the events in 1987 failed to adequately resolve any management problems which might have existed at the GTRR prior to the taking of such actions. If the answer to this interrogatory is yes, please explain fully why such corrective actions did not resolve any such problems.

11. State whether GANE contends that the Nuclear Safeguards Committee (NSC), the Office of Radiation Safety (ORS), or the Manager of ORS have failed to properly perform their respective roles, at any time from 1988 to the present. If the answer to this interrogatory is yes, please explain fully all examples of improper or inadequate performance of

these entities since 1988.

12. Does GANE have a management plan that it contends should be instituted at GTRR? If the answer to this interrogatory is yes, please state the following:

- a. the identity of the person(s) who developed such plan;
- b. describe such plan, giving specific details as to organization, safety assurance, and operation;
- c. describe all differences between the organizational structure and management currently in place at GTRR and the plan suggested by GANE.

13. Does GANE contend that management at the GTRR should be changed in any respect? If so, please describe all such proposed changes and the purpose of all such changes.

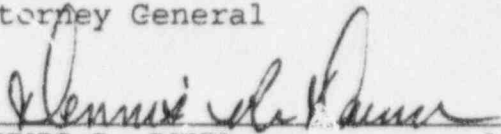
14. Does GANE contend that the GTRR cannot be managed appropriately and safely under any management plan? If the answer to this interrogatory is yes, please provide the factual basis of such contention.

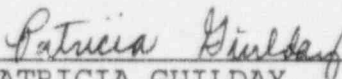
Request for Production

1. Please produce each of the documents identified in any of your responses to Georgia Tech's Interrogatories.
2. Please identify any other document which you claim has any relevance to your contention concerning GTRR management.

Respectfully submitted,

MICHAEL J. BOWERS 174567
Attorney General


DENNIS R. DUNN 234098
Senior Assistant Attorney General


PATRICIA GUILDAY 315113
Assistant Attorney General

PLEASE ADDRESS ALL
COMMUNICATIONS TO:

PATRICIA GUILDAY
Assistant Attorney General
Georgia Department of Law
40 Capitol Square, S.W.
Atlanta, Georgia 30334-1300

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UNITED STATES OF AMERICA
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GEORGIA INSTITUTE)
OF TECHNOLOGY)

Atlanta, Georgia)

Georgia Tech Research)
Reactor)

Renewal of License No. R-97)

) Docket No. 50-160-Ren
) ASLBP NO. 95-704-01-Ren

GEORGIA INSTITUTE OF TECHNOLOGY'S
CERTIFICATE OF SERVICE

I do hereby certify that copies of the foregoing Georgia Institute of Technology's Interrogatories and Request for Production to GANE have been served upon the following persons by U.S. Mail, except as otherwise noted and in accordance with the requirement of 10 C.F.R. Sec. 2.712:

Administrative Judge
Peter S. Lam
Atomic Safety And Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
Mail Stop: T-3 F23
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
Jerry R. Kline
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Administrative Judge
Charles Bechhoefer, Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Sherwin E. Turk, Esq.
Susan S. Chidakel, Esq.
Office of the General Counsel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Randy A. Nordin, Esq.
E. Gail Gunnels, Esq.
Georgia Institute of
Technology
400 10th Street
Atlanta, Georgia 30332

Glenn Carroll
Georgians Against Nuclear
Energy
Post Office Box 8574
Atlanta Georgia 30306

Office of the Secretary (2)
Attn: Docketing and Service
Mail Stop: OWFN-16 G15
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Adjudicatory File (2)
Atomic Safety and Licensing
Board
Mail Stop: T-3 F23
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. R.A. Karam
Neely Nuclear Research
Center
900 Atlantic Drive
Atlanta, Georgia 30332-0425

This 1st day of December, 1995.

Patricia Guilday

PATRICIA GUILDAY
Assistant Attorney General