

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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IN THE MATTER OF :
PUBLIC SERVICE ELECTRIC :
AND GAS CO., et al. :

Docket No. 50-354-OL

OFFICE OF THE SECRETARY
REGULATORY AND SAFETY
BRANCH

(Hope Creek Generating Station,
Unit 1) :

INTERVENOR'S RESPONSE TO THE
ATOMIC SAFETY AND LICENSING
BOARD'S ORDER OF AUGUST 10, 1984

The Public Advocate is submitting the following information in response to the Atomic Safety and Licensing Board's August 10, 1984, order. In that order, the Board states:

"The Public Advocate of New Jersey will be given to and including August 20, 1984, to identify its witnesses and to make them reasonably available for depositions within two weeks thereafter."

In response to this order, the Public Advocate has made arrangements to use the expert services of MHB Technical Associates located at 1723 Hamilton Avenue, Suite K, San Jose, California 95125. Specifically, the Public Advocate plans to call as an expert witness Dale Bridenbaugh of MHB Technical Associates on the first contention regarding pipe cracks; Dale Bridenbaugh and Richard Hubbard of MHB Technical Associates on the contention regarding management competence; and Richard Hubbard and Gregory Minor of MHB Technical Associates on the contention regarding environmental qualifications.

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In addition, the Public Advocate is presently in the process of obtaining a metallurgist to testify on the contention regarding pipe cracks. We have attempted to contact Professor Robert N. Anderson of San Jose State University, San Jose, California, for these purposes, but he has been unavailable to date. In light of his present unavailability, our Department has not yet been able to finalize the arrangements with Professor Anderson. Under these circumstances, it is not possible to identify him with certainty at this time as a witness. However, as soon as the intervenor is able to discuss the matter with Professor Anderson, we will notify the Board and the parties of his status.

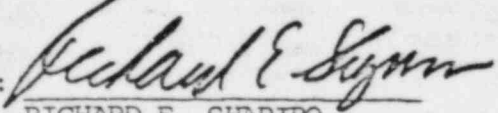
At this time, the Public Advocate does not foresee the need for other expert witnesses in this proceeding. However, in the event that we are advised by our present expert witnesses that other testimony would assist the Board in assessing our contentions in a fair and appropriate manner, we will advise the Board, the parties and the applicant of the identity of these witnesses forthwith.

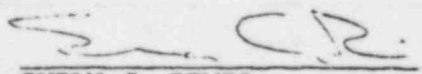
With respect to the precise timing of the depositions of the intervenor's witnesses, the Public Advocate respectfully requests that this Board consider our petition for additional time within which to make expert witnesses available for depositions, which is being filed contemporaneously in this matter.

Dated: August 20, 1984

Respectfully submitted,

JOSEPH H. RODRIGUEZ
PUBLIC ADVOCATE
STATE OF NEW JERSEY

By: 
RICHARD E. SHAPIRO
DIRECTOR, DIVISION OF PUBLIC INTEREST
ADVOCACY


SUSAN C. REMIS
ASSISTANT DEPUTY PUBLIC ADVOCATE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
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Before the Atomic Safety and Licensing Board

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PUBLIC SERVICE ELECTRIC
AND GAS COMPANY (HOPE
GENERATING STATION) :

Docket No. 50354OL CREEK

DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of "Intervenor's Response to the Atomic Safety and Licensing Board's Order of August 10, 1984," dated August 20, 1984, in the abovementioned matter, have been served upon the following by deposit in the United States mail on this 20th day of August, 1984:

Marshall E. Miller, Esquire
Chairman
Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Peter A. Morris
Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. David R. Schink
Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
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Atomic Safety and Licensing Appeal Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Atomic Safety and Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, DC 20555

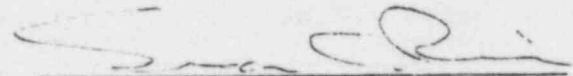
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Susan C. Remis
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Dated: August 20, 1984