

III. Request for Interrogatories

1. Please identify each person who supplied information for responding to these Interrogatories and Request for Production. Specifically note the Interrogatories for which each such person supplied information.

Supplemental Response: Various clerical staff assisted in the compilation of the documents, produced.

6. Spent Fuel Project ("SFP")

a. Please identify by name and position all individuals assigned to the SFP, including outside consultants, their business affiliation and the location of their companies.

Supplemental Response: Kevin Gavin, contractor, then employed by NNECO as a contractor, present employment unknown.

Dominick Napolitano then employed by NNECO as a summer intern, present employment unknown.

Michael Lico then employed by NNECO, and currently employed by DNC.

8. Please state whether NNECO or DNC has reported any lost, stolen or missing licensed material to the NRC pursuant to 10 C.F.R. Part 20.2201(a)(1)(ii) and, if so, please identify each such report by title, date and author.

Supplemental Response: In its earlier response of November 21, 2001 ("earlier response"), DNC stated that will produce Licensee Event Reports responsive to this request. These documents are produced as L011115 - L011148.

IV. Requests for Production

Subject to these general qualifications and those stated in DNC's Response to Intervenor's First Set of Interrogatories and Request for Production in the Reopened Proceedings, filed November 21, 2001, Licensee hereby responds as follows to Intervenor's specific document requests:

1. Please produce a copy of all documents identified in Interrogatory 1a.

Response: See supplemental response to Request for Interrogatories No. 1, above.

2. Please produce a copy of all documents identified in Interrogatory 2a.

Response: There are no documents responsive to Interrogatory No. 2(a). Assuming that Intervenor is requesting documents identified in Interrogatory No. 2(b), these documents are produced as L006199 - L007198, and L010145 - L010325.

3. Please produce all reports and draft versions of reports identified in Interrogatory No. 3.

Response: These documents are produced as L007199 - L008645, L008836 - L009959, and L009963 - L010144.

4. Please produce a copy of all documents identified in Interrogatory 5b and all attached or referenced records, reports and correspondence.

Response: See earlier response.

5. Please produce a copy of all documents identified in Interrogatory 6a.

Response: There are no documents responsive to Interrogatory No. 6(a). Assuming Licensee meant to request documents identified in Interrogatory No. 6(b), those documents are produced as L011149 - L013744.

6. Please produce a copy of all documents identified in Interrogatory 7.

Response: See earlier response.

7. Please produce the documents identified in Interrogatory 10(a) and 10(b).

Response: See earlier response.

8. Please produce a copy of the report entitled Northeast Nuclear Energy Company "Independent Assessment of Millstone Unit 1 Spent Fuel Pool System Issues," prepared by Raytheon Engineers and Constructors ("RE&C") dated April 30, 1997.

Response: This document is produced as L008646 - L008835.

9. Please produce a copy of Exhibits 1-40 attached to the OI Report ("List of Exhibits").

Response: See earlier response.

10. Please produce a copy of the Fuel Index Card, dated with a May 12, 1979 entry, indicating that the tie rod and spacer capture rod in question are in the northwest corner of the Unit 1 spent fuel pool.

Response: This document is produced as L008941 - L008943.

11. Please produce a copy of the subpoena issued by NRC's Office of Investigations to Charles C. Thebaud, Corporate Counsel, Morgan, Lewis and Bockius, LLP.
Response: This document is produced as L009960 - L009962.
12. Please produce Carol Mandigo's complete Journal as referenced in OI Report at 10.
Response: See earlier response. This document is produced as L010544 - L010561.
13. Please produce Rockwell L. Radasch's complete Calendar/Day Planner as referenced in OI Report at 10.
Response: Mr. Radasch no longer possesses the personal calendar referenced in OI Report at 10. What was turned over to OI by the Licensee has been or will be produced by the NRC Staff.
14. Please produce Michael P. Hills' complete Notes as referenced in OI Report at 10.
Response: This document is produced as L010562 - L010992.
15. Please produce the letter written in 1979 by T.G. Piascik, as referenced in the OI Report at 12.
Response: This document is produced as L007400 - L007403.
16. Please produce the Kardex file card referenced in the OI Report at 13, paragraph 2.
Response: This document is produced as L007406 - L007408.
17. Please produce the Millstone Unit 1 Material Transfer Forms.
Response: These documents are produced as L000001 - L006198, and L010993 - L011114.
18. Please produce the photographs taken during the raised fuel assembly search, as referenced in the OI Report at 14.
Response: Copies of these photographs are produced as L010326 - L010361.
19. Please produce the photographs taken in November 2000, as referenced in the OI Report at 15.
Response: See earlier response.
20. Please produce the draft CR as referenced in the OI report at 25.
Response: See earlier response.

21. Please produce the photographs conducted by "Hills and Radasch" as referenced in the OI Report at 28.

Response: See earlier response.

22. Please produce all items identified in the "Endnotes" section of the "Fuel Rod Accountability Project" ("FRAP").

Response: See earlier response.

23. Please produce all items identified in the "Reference List" section of the FRAP.

Response: These documents are produced as L007298 - L008645.

24. Please produce the "Internal Communications" identified in the FRAP Appendix.

Response: These documents are produced as L010145 - L010149.

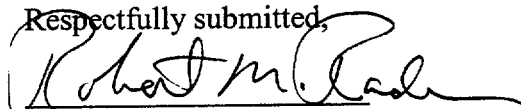
25. Please produce transcripts of the interviews conducted as referenced in the "Root Cause Investigation" Report at 92-93.

Response: These documents are produced as L010362 - L010543.

26. Please produce the documents referenced in the "Root Cause Investigation" Report at 94-98.

Response: These documents are produced as L009959 - L008940.

Respectfully submitted,



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Dated in Washington, D.C.
this 7th day of December 2001

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

ASLBP No. 00-771-01-LA-R

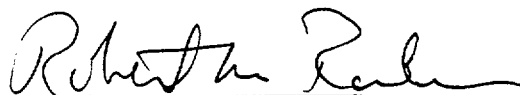
Adjudicatory File
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
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*The NRC Staff has requested that it be served with only those documents produced to Intervenorors that it specifically requests.

A handwritten signature in black ink, appearing to read "Robert Rader", written over a horizontal line.

Robert Rader
Counsel for DNC, Inc.