

November 11, 2002

**UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD**

**DOCKETED
USNRC**

November 19, 2002 (1:24PM)

**Before Administrative Judges:
Thomas S. Moore, Chairman
Charles N. Kelber
Peter S. Lam**

**OFFICE OF SECRETARY
RULEMAKINGS AND
ADJUDICATIONS STAFF**

In the Matter of)	
)	
DUKE COGEMA STONE & WEBSTER)	Docket No. 0-70-03098-ML
)	
(Savannah River Mixed Oxide Fuel)	ASLBP No. 01-790-01-ML
Fabrication Facility))	
)	

**GEORGIANS AGAINST NUCLEAR ENERGY'S AND BLUE RIDGE
ENVIRONMENTAL DEFENSE LEAGUE'S FIRST SUPPLEMENTAL
RESPONSE TO APPLICANT'S FIRST SET OF INTERROGATORIES**

Pursuant to 10 C.F.R. § 2.740(e), intervenors Georgians Against Nuclear Energy ("GANE") and Blue Ridge Environmental Defense League ("BREDL") hereby supplemental their June 28, 2002, response to interrogatories filed by Duke Cogema Stone & Webster on May 31, 2002.¹ The purpose of this supplemental response is to correct errors that were made in the intervenors' June 28, 2002, response, and to provide supporting declarations by the individuals who were responsible for answering the

¹ See Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League Objections and Responses to Applicant's First Set of Interrogatories, and Request for Protective Order (June 28, 2002); Duke Cogema Stone & Webster's First Set of Interrogatories to Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League (May 31, 2002).

interrogatories. Attached are the declarations of Glenn Carroll, Diane Curran, Peter Burkholder, and Dr. Edwin S. Lyman.

I. RESPONSES TO GENERAL INTERROGATORIES

GENERAL INTERROGATORY NO. 1 State the name, business address, and job title of each person who was consulted and/or who supplied information for: (a) drafting each of the Admitted Contentions; and (b) responding to these interrogatories. Identify for which specific contentions and interrogatories each such person was consulted and/or supplied information.

If the information or opinions of anyone who was consulted in connection with your response to an interrogatory differs from your written answer to that interrogatory, please describe in detail the differing information or opinions.

SUPPLEMENTAL RESPONSES: In its initial discovery response, the intervenors separately identified those interrogatories that were answered by their experts, and those interrogatories which were answered by intervenors and GANE's legal advisor.

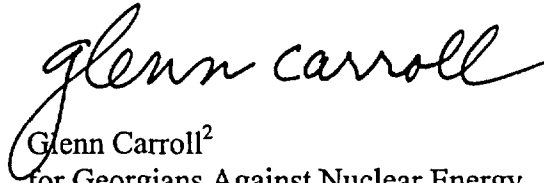
Intervenors have discovered that they made several errors in identifying which interrogatories were answered by their experts. Corrections to these responses are made below:

CONTENTION 1: GANE's initial response indicated that Dr. Lyman did not answer, among others, interrogatory 1.22. GANE hereby corrects that response to state that Dr. Lyman is responsible for the answer to interrogatory 1.22. The response is otherwise correct.

CONTENTION 3: GANE's initial response indicated that Peter Burkholder did not answer, among others, interrogatories 3.15, 3.17, 3.18, or 3.28. GANE hereby corrects that response to state that Mr. Burkholder is responsible for the answers to those interrogatories. The response is otherwise correct.

CONTENTION 6: GANE's initial response indicated that Dr. Lyman did not answer, among others, interrogatories 6.2, 6.8, or 6.24. GANE hereby corrects that response to state that Dr. Lyman is responsible for the answer to these interrogatories. The response is otherwise correct.

Respectfully submitted,

A handwritten signature in cursive script that reads "glenn carroll". The signature is written in black ink and is positioned above the printed name and address.

Glenn Carroll²
for Georgians Against Nuclear Energy
139 Kings Highway
Decatur, GA 30030
404-378-4263

Dated November 11, 2002
in Decatur, Georgia

² This pleading was prepared with substantial assistance from GANE's legal adviser, Diane Curran.

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DUKE COGEMA STONE & WEBSTER)

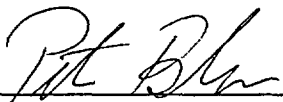
Docket No. 0-70-03098-ML

(Savannah River Mixed Oxide Fuel)
Fabrication Facility))
_____)

ASLBP No. 01-790-01-ML

**SUPPLEMENTAL DECLARATION OF PETER BURKHOLDER
IN SUPPORT OF INTERVENORS' DISCOVERY RESPONSES**

Under penalty of perjury, I, Peter Burkholder declare that I assisted in the preparation of Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League Objections and Responses to Applicant's First Set of Interrogatories, and Request for Protective Order (June 28, 2002), as supplemented by GANE's First Supplemental Response to Applicant's First Set of Interrogatories ("First Supplemental Response"). The factual information in my interrogatory responses is true and correct to the best of my knowledge, and the opinions expressed therein are based on my best professional judgment.



Peter Burkholder

Date: 31 Oct 2002

UNITED STATES OF AMERICA
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ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
Thomas S. Moore, Chairman
Charles N. Kelber
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DUKE COGEMA STONE & WEBSTER)


Docket No. 0-70-03098-ML

(Savannah River Mixed Oxide Fuel)
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DECLARATION OF GLENN CARROLL
IN SUPPORT OF INTERVENORS' DISCOVERY RESPONSES

Under penalty of perjury, I, Glenn Carroll, declare that I assisted in the preparation of Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League Objections and Responses to Applicant's First Set of Interrogatories, and Request for Protective Order (June 28, 2002), as supplemented by GANE's First Supplemental Response to Applicant's First Set of Interrogatories ("First Supplemental Response"). The factual information in my interrogatory responses is true and correct to the best of my knowledge, and any opinions are based on my best judgment as a layperson.


Glenn Carroll

Date: 11/11/02

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:
Thomas S. Moore, Chairman
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_____)

ASLBP No. 01-790-01-ML

DECLARATION OF DIANE CURRAN
IN SUPPORT OF INTERVENORS' DISCOVERY RESPONSES

Under penalty of perjury, I, Diane Curran, declare that I assisted in the preparation of Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League Objections and Responses to Applicant's First Set of Interrogatories, and Request for Protective Order (June 28, 2002), as supplemented by GANE's First Supplemental Response to Applicant's First Set of Interrogatories ("First Supplemental Response"). I am responsible for all objections and statements of legal opinion in the interrogatory answers.



Diane Curran

Date: 10/31/02

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**SUPPLEMENTAL DECLARATION OF DR. EDWIN S. LYMAN
IN SUPPORT OF INTERVENORS' DISCOVERY RESPONSES**

Under penalty of perjury, I, Dr. Edwin S. Lyman, declare that I assisted in the preparation of Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League Objections and Responses to Applicant's First Set of Interrogatories, and Request for Protective Order (June 28, 2002), as supplemented by GANE's First Supplemental Response to Applicant's First Set of Interrogatories ("First Supplemental Response"). The factual information in my interrogatory responses is true and correct to the best of my knowledge, and the opinions expressed therein are based on my best professional judgment.



Dr. Edwin S. Lyman

Date: 10/31/02

CERTIFICATE OF SERVICE
by Georgians Against Nuclear Energy
(Docket # 70-3098, ASLBP # 01-790-01-ML)

I hereby certify that Georgians Against Nuclear Energy's Supplemental Response to Applicant's First Set of Interrogatories was e-mailed to the following with hard copies served by First Class U.S. Mail.

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Respectfully submitted,


Glenn Carroll
for GANE

November 11, 2002 in Decatur, Georgia