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June 29, 1979

RELATED CORRESPONDENCE



Valentine B. Deale, Esq.
Chairman, Atomic Safety &
Licensing Board
1001 Connecticut Ave. N.W.
Washington, D.C. 20036

Re: Skagit Nuclear Project
Docket Nos. 50-522 and 50-523

Dear Chairman Deale:

Due to the fact that the expert who previously assisted us in dealing with Ranney Wells, Mr. Haley, is unavailable, and that we were not able to locate a hydrologist who could assist us with reviewing the staff Ranney Well testimony until just this week, we were not in a position to prefile Ranney Well testimony, although I believe all parties were aware of our intention to offer testimony on this subject.

We advise by this letter that we have secured the services of Paul R. Weber, P.E., a hydrologist, who is now engaged in preparing prefiled testimony. We expect that that testimony will be available for filing and service on or before July 10.

To describe the nature of Mr. Weber's proposed testimony, we enclose a copy of his letter of June 29, 1979, with attached resume.

We have secured witnesses who will testify on the subject of alternative sources, but unfortunately preparation of their prefiled testimony has also been delayed. Dr. Eric Cheney, of the University of Washington, who has previously testified in this matter and whose qualifications are therefore on the record, has been out of town. He is to return

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July 7. We are also expecting to offer the testimony of Mr. R. Green, of the British Columbia Energy Commission. Mr. Green has been out of town for the past three weeks and is expected to return on July 3. We anticipate, in view of the return dates of these witnesses, that we shall be able to prefile their testimony, which, as Mr. Weber's is, is in the nature of rebuttal, by July 10, 1979.

The testimony of Dr. Cheney and Mr. Green will deal with the availability and abundance of thermal coal in British Columbia, the economics of transporting such coal to the Puget Sound, and alternative coal-fired plant sites, and detailed rebuttal to the testimony offered July 2, 1976, by David H. Knight, as well as any additional staff or applicant testimony addressed to the British Columbia coal alternative.

Our witnesses on alternative sites have not as yet completed drafting their prefiled testimony. Since they are volunteers, and in the case of Drs. Cook and Marts, had academic responsibilities which were of necessity placed before their work on this matter, this was beyond our control.

These witnesses are Dr. Marion Marts, Professor of Geography, University of Washington, who will testify as to the demographic, environmental, and land use advantages of alternative sites to the Skagit site, including the Hanford and West Roosevelt sites, and alternative sites previously discussed in the record. Dr. Susan Cook, Assistant Professor of Ecology at Western Washington University, will testify as to the relative advantages of the above identified alternative sites, to the Skagit site, in terms of damage to the environment. Ronald Carstens, an engineer with experience as an economic evaluation analyst, will testify as to the economic feasibility of power transmission from generating sites east of the Cascades.

In addition, we anticipate calling a witness familiar with the feasibility study of the West Roosevelt site by the Energy Facility Site Evaluation Council. It may be necessary to subpoena such a witness. In any event, we are not in a position to submit prefiled testimony from

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such a witness, since such witness is not under our control.

We also intend to call a witness from the Bonneville Power Administration, who will testify as to the general availability and desirability of alternative sites in the region. We are still engaged in the process of trying to locate the person who would be best suited for this purpose.

We will prefile the testimony of our witnesses on alternative sites as soon as such testimony becomes available, and in no event later than July 10, 1979.

Respectfully yours,



Handwritten signature of Roger M. Leed, consisting of a stylized 'R' and 'L' followed by a horizontal line.

ROGER M. LEED

RML:sjc
Enc.
cc: See attached list

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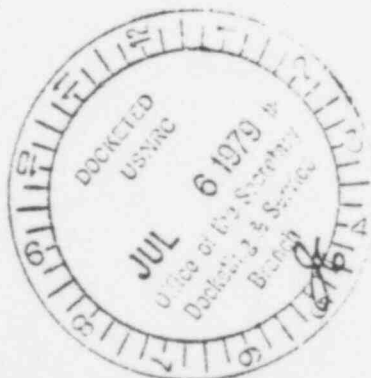
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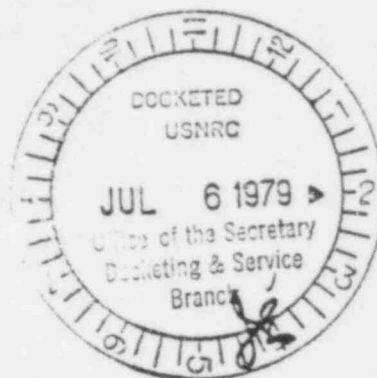
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RELATED CORRESPONDENCE

June 29, 1979

Roger Leed, Attorney
1411 Fourth Avenue Building
Seattle, WA



Dear Mr. Leed:

This letter provides a brief summary of areas where we would testify in the issue of installation of Ranney Collectors at the Skagit Nuclear power plant site. An enclosure listing this writer's professional qualifications is attached.

Our testimony will address certain geological and hydrological questions and the environmental impacts of the proposed Ranney Collectors. Testimony by the applicant and others, which we have examined, recognizes the possibility of clogging of the Ranney laterals by C. polyspora, an iron bacteria. It is our opinion that this event is considerably more likely than indicated in that testimony and its operational impact deserves fuller consideration. Also, environmental impacts of the Collector wells have not been adequately considered.

Several inconsistencies in the testimony regarding the geologic and hydrologic conditions at the site and at the Skagit PUD site leave the issue of iron bacteria formation open. Inadequate consideration of the effects of chlorine flushing and of drastic lowering and reversal of the groundwater table in the vicinity of the collector wells leave unresolved environmental questions.

We are continuing our assessment of these matters, and will provide full technical support in the near future.

Respectfully submitted,

PAUL WEBER & ASSOCIATES

A handwritten signature in cursive script, appearing to read "Paul R. Weber".

Paul R. Weber, P.E.

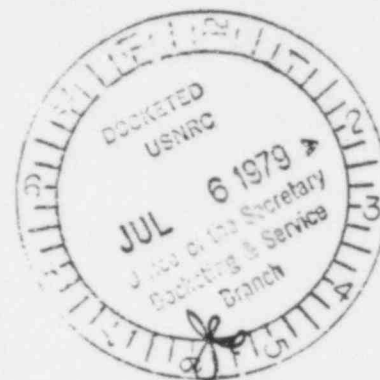
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PAUL WEBER & ASSOCIATES

GROUND ENGINEERING



PROFESSIONAL QUALIFICATIONS & EXPERIENCE

PAUL R. WEBER

- 36 years of age
- Eleven year Seattle resident
- BSCE, Arizona State University, 1964
- Recently completed four full-time quarters as graduate student in Geology and Geotechnical Engineering, University of Washington
- Registered Engineer, Washington, Oregon and Georgia

EMPLOYMENT EXPERIENCE

- Southwest Materials Laboratory, Phoenix, June '64 to Jan. '66
- Dames & Moore, Seattle, Jan. '66 to Nov. '71
- Owner of Private Practice, Seattle, Nov. '71 to Present

GROUND ENGINEERING

Paul Weber & Associates provides Ground Engineering services to Designers and Contractors in the following areas:

- Soils, materials, and subsurface investigations
- Engineering Geology / Environmental Geology
- Investigations for claims, failures and legal disputes arising from ground construction and engineering
- Design and cost estimating for foundations, retaining structures and excavation bracing systems
- Design, installation and evaluation of Geotechnical Instrumentation
- Applied research in ground engineering

POOR ORIGINAL

Paul R. Weber

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ENVIRONMENTAL GEOLOGY

- 1969 WEYERHAUSER HEADQUARTERS BUILDING - Lake and drainage studies for a man-made lake at the Federal Way office complex.
- 1969 CITY OF MARYSVILLE WATER SUPPLY - Investigations for expanding and improving the Marysville Storage Pond and water supply system.
- 1974 CHERYL LEE HEIGHTS - Subsurface drainage design, 30 acre Maple Valley Subdivision.
- 1974 TERMINATION POINT LANDSLIDE - 200 foot high by 1200 foot long landslide on Hood Canal, Jefferson County, Washington.
- 1974 BIG BEAVER LAKE AGGREGATE SOURCE - Environmental geology and aggregate quality studies for Kitsap County project.
- 1975 GOLDEN GARDENS LANDSLIDE - 300 foot high by 1500 foot long landslide in Seattle. Stabilization measures following failure by City of Seattle forces.
- 1975 WOODWAY PARK LANDSLIDE - 300 foot high by 1300 foot long landslide near Edmonds, Washington. Drainage stabilization of landslide for Burlington Northern and local residents.
- 1976 SAN DIEGO HARBOR DREDGING - Geologic studies of changed conditions in Corps of Engineers contract for dredging San Diego Harbor - for General Construction.
- 1977 CARKEEK ESTATES - Environmental geology studies for 6.7 acre condominium development in Carkeek Park drainage basin, Seattle.
- 1977 QUEEN ANNE DEVELOPMENT - Environmental geology, foundation and ground engineering studies for 300-acre comprehensive development plan.
- 1977 SOUTHPARK APARTMENT PROJECT - Environmental geology and storm drainage design to King County standards, six-acre site, Southpark, Seattle.
- 1977 RED DOT HEATER CORPORATION - Environmental geology and storm drainage design for 19 acre Green River Valley site, Kent, Washington
- 1977 MARATHON CORPORATION - Environmental geology for major downtown office complex with two towers, one 11-story and the second 20-story, Bellevue, Washington.

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paul r weber

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