

governing the licensing to receive and possess source, special nuclear, and by-product material at a geological repository operations area that is sited, constructed, or operated in accordance with the NWPA (1982). However, the Commission proposes to supersede the generic criteria in Part 60 for disposal at a waste repository with specific criteria in a new 10 CFR Part 63 issued on February 22, 1999 (64 FR 8640).

- **Interim storage of Greater-than-Class-C (GTCC) Waste:** The NRC regulations at 10 CFR 61.55 define three classes of low-level waste (LLW) (A, B, and C) that are suitable for near-surface disposal. Class C waste is required to meet the most rigorous disposal requirements. The LLW that exceeds the concentration limits set for Class C waste is referred to as GTCC waste. Typically, GTCC waste is composed of activated metal components and process wastes.

On October 11, 2001 the NRC amended its regulations (in 66 FR 51823), to permit interim storage of GTCC waste used or generated by commercial power reactors within an ISFSI or monitored retrievable storage (MRS) facility. This change permits the co-locating of spent fuel and solid reactor-related GTCC waste in different casks and containers within the ISFSI or MRS. Commingling of spent fuel and GTCC waste in the same storage cask is not permitted, except on a case-by-case basis. Ultimately, GTCC waste must be disposed of in a geologic repository.

- **LLW disposal at a licensed LLW site or treatment of LLW at compactor facilities:** The disposal of LLW is not within the scope of this Supplement. LLW is defined as any radioactive waste that is not classified as HLW, spent nuclear fuel, transuranic waste,^(a) or uranium or thorium mill tailings. LLW often contains small amounts of radioactivity dispersed in large amounts of material, but may also have activity levels requiring shielding and remote handling. LLW that is generated during decommissioning is usually composed of the following material contaminated with radionuclides: rags, papers, filters, solidified liquids, ion-exchange resins, tools, equipment, discarded protective clothing, dirt, construction rubble, concrete, and piping.

Regulations related to LLW disposal are in 10 CFR Part 61 and 10 CFR Part 20, Subpart K. A final GEIS supporting the regulations in 10 CFR Part 61, was published in 1982 as "Final Generic Environmental Impact Statement for 10 CFR Part 61," NUREG-0945 (NRC 1982). A license for the LLW disposal site is not issued until the applicant provides an environmental report (ER) indicating that the applicant's proposed disposal site, design,

(a) Transuranic waste contains man-made elements heavier than uranium that decay by emitting alpha particles. Such waste is produced during reactor fuel assembly, weapons fabrication, and chemical processing operations.

Appendix D

operations, site closure, and post-closure institutional controls are adequate to protect public health and safety. The licensee for the LLW site must show that there is reasonable assurance that (1) the general population will be protected from releases of radioactivity, (2) that individual inadvertent intruders are protected, (3) that standards for radiation protection in 10 CFR Part 20 are met, and (4) that the long-term stability of the disposed waste and the disposal site will be achieved and will eliminate, to the extent practical, the need for ongoing active maintenance of the disposal site following closure. The ER will be reviewed by the NRC and the impacts of LLW disposal evaluated in an Environmental Impact Statement (EIS) that is written for the specific LLW site. The technical requirements for land-disposal facilities are covered in Subpart D of 10 CFR Part 61. The financial assurance requirements are covered in Subpart E of 10 CFR Part 61.

- Activities related to the ENTOMBMENT Period:

On October 16, 2001, the Commission issued an advance notice of proposed rulemaking (ANPR) inviting input from stakeholders on "Entombment options for Power Reactors" (66 FR 52551). Consistent with the environmental evaluation of the DECON and SAFSTOR decommissioning options, the staff has limited its environmental evaluation of ENTOMB to those issues related to activities necessary to prepare the facility for entombment.

Issues and resulting impacts related to the ENTOMB option after the facility begins entombment, such as NRC oversight and monitoring requirements, durability of institutional controls and engineered barriers, indefinite retention onsite of radioactive materials, and other long-term site-specific issues are outside the scope of this Supplement.

A future environmental assessment in support of NRC rulemaking related to the entombment options may address these issues depending on the proposed changes to the regulations.

- Activities following license termination under restricted use conditions: Licensees are allowed by regulations in 10 CFR Part 20, Subpart E, "Radiological Criteria for License Termination," to release the site for restricted use. The impacts following a restricted release license termination will not be considered by this Supplement because the licensee is required to conduct a site-specific analysis to support development of an NRC site-specific EIS.
- Activities and impacts from living or working on the site after license termination: Analysis of radiological impacts from unrestricted use after decommissioning and license termination are presented in NUREG-1496, *Generic Environmental Impact Statement in Support of Rulemaking on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities* (NRC 1997). This GEIS analyzed regulatory

alternatives for establishing radiological criteria for decommissioning structures and lands of licensed facilities. The scope included both radiological and nonradiological impacts on human health and safety, including radiation exposure resulting from occupancy of site buildings and residence on site lands following decommissioning and license termination.

D.1 References

10 CFR 20. Code of Federal Regulations, Title 10, *Energy*, Part 20, "Standards for protection against radiation."

10 CFR 50. Code of Federal Regulations, Title 10, *Energy*, Part 50, "Domestic licensing of production and initialization facilities."

10 CFR 51. Code of Federal Regulations, Title 10, *Energy*, Part 51, "Environmental protection regulations for domestic licensing and related regulatory functions."

10 CFR 61. Code of Federal Regulations, Title 10, *Energy*, Part 61, "Licensing requirements for land disposal of radioactive waste."

10 CFR 63. Code of Federal Regulations, Title 10, *Energy*, Part 63, "Disposal of high-level radioactive wastes in a geologic repository at Yucca Mountain, Nevada."

10 CFR 71. Code of Federal Regulations, Title 10, *Energy*, Part 71, "Packaging and transportation of radioactive material."

10 CFR 72. Code of Federal Regulations, Title 10, *Energy*, Part 72, "Licensing requirements for the independent storage of spent nuclear fuel and high-level radioactive waste."

54 FR 39767. "10 CFR Part 51 Waste Confidence Decision Review." *Federal Register*. September 28, 1989.

64 FR 8640. "10 CFR Parts 2, 19, 20, 21, 30, 40, 51, 60, 61, and 63 Disposal of High-Level Radioactive Wastes in a Proposed Geologic Repository at Yucca Mountain, Nevada." *Federal Register*. February 22, 1999.

64 FR 68005. "Waste Confidence Decision Review." *Federal Register*. December 6, 1999.

66 FR 51823. "Interim Storage for Greater Than Class C Waste 10 CFR Parts 30, 70, 72, and 150." *Federal Register*. October 11, 2001.

Appendix D

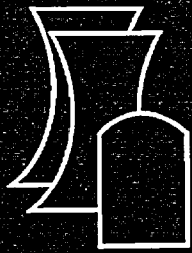
66 FR 52551. "Entombment Options for Power Reactors." *Federal Register*. October 16, 2001.

Nuclear Waste Policy Act of 1982, as amended, 42 USC 10.101 et seq.

U.S. Nuclear Regulatory Commission (NRC). 1982. *Final Generic Environmental Impact Statement for 10 CFR Part 61*. NUREG-0945, NRC, Washington, D.C.

U.S. Nuclear Regulatory Commission (NRC). 1988. *Final Generic Environmental Impact Statement for Decommissioning of Nuclear Facilities*. NUREG-0586, NRC, Washington, D.C.

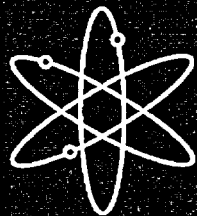
U.S. Nuclear Regulatory Commission (NRC). 1997. *Final Generic Environmental Impact Statement in Support of Rulemaking on Radiological Criteria for License Termination of NRC-Licensed Nuclear Facilities*. NUREG-1496, Vol. 1, NRC, Washington, D.C.



Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities



Supplement 1



**Regarding the Decommissioning of
Nuclear Power Reactors**



Appendices N, O and P

Final Report



**U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, DC 20555-0001**



AVAILABILITY OF REFERENCE MATERIALS IN NRC PUBLICATIONS

NRC Reference Material

As of November 1999, you may electronically access NUREG-series publications and other NRC records at NRC's Public Electronic Reading Room at <http://www.nrc.gov/reading-rm.html>.

Publicly released records include, to name a few, NUREG-series publications; *Federal Register* notices; applicant, licensee, and vendor documents and correspondence; NRC correspondence and internal memoranda; bulletins and information notices; inspection and investigative reports; licensee event reports; and Commission papers and their attachments.

NRC publications in the NUREG series, NRC regulations, and *Title 10, Energy*, in the Code of *Federal Regulations* may also be purchased from one of these two sources.

1. The Superintendent of Documents
U.S. Government Printing Office
Mail Stop SSOP
Washington, DC 20402-0001
Internet: bookstore.gpo.gov
Telephone: 202-512-1800
Fax: 202-512-2250
2. The National Technical Information Service
Springfield, VA 22161-0002
www.ntis.gov
1-800-553-6847 or, locally, 703-605-6000

A single copy of each NRC draft report for comment is available free, to the extent of supply, upon written request as follows:

Address: Office of the Chief Information Officer,
Reproduction and Distribution
Services Section
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
E-mail: DISTRIBUTION@nrc.gov
Facsimile: 301-415-2289

Some publications in the NUREG series that are posted at NRC's Web site address <http://www.nrc.gov/reading-rm/doc-collections/nuregs> are updated periodically and may differ from the last printed version. Although references to material found on a Web site bear the date the material was accessed, the material available on the date cited may subsequently be removed from the site.

Non-NRC Reference Material

Documents available from public and special technical libraries include all open literature items, such as books, journal articles, and transactions, *Federal Register* notices, Federal and State legislation, and congressional reports. Such documents as theses, dissertations, foreign reports and translations, and non-NRC conference proceedings may be purchased from their sponsoring organization.

Copies of industry codes and standards used in a substantive manner in the NRC regulatory process are maintained at—

The NRC Technical Library
Two White Flint North
11545 Rockville Pike
Rockville, MD 20852-2738

These standards are available in the library for reference use by the public. Codes and standards are usually copyrighted and may be purchased from the originating organization or, if they are American National Standards, from—

American National Standards Institute
11 West 42nd Street
New York, NY 10036-8002
www.ansi.org
212-642-4900

Legally binding regulatory requirements are stated only in laws; NRC regulations; licenses, including technical specifications; or orders, not in NUREG-series publications. The views expressed in contractor-prepared publications in this series are not necessarily those of the NRC.

The NUREG series comprises (1) technical and administrative reports and books prepared by the staff (NUREG-XXXX) or agency contractors (NUREG/CR-XXXX), (2) proceedings of conferences (NUREG/CP-XXXX), (3) reports resulting from international agreements (NUREG/IA-XXXX), (4) brochures (NUREG/BR-XXXX), and (5) compilations of legal decisions and orders of the Commission and Atomic and Safety Licensing Boards and of Directors' decisions under Section 2.06 of NRC's regulations (NUREG-0750).

Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities

Supplement 1

Regarding the Decommissioning of Nuclear Power Reactors

Appendices N, O and P

Final Report

Manuscript Completed: October 2002

Date Published: November 2002

**Division of Regulatory Improvement Programs
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001**



Abstract

This document is a supplement to the U.S. Nuclear Regulatory Commission (NRC) document *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities* issued in 1988 (NUREG-0586, referred to here as the 1988 Generic Environmental Impact Statement [GEIS]). This Supplement was prepared because of technological advances in decommissioning operations, experience gained by licensees, and changes made to NRC regulations since the 1988 GEIS.

This Supplement updates the information provided in the 1988 GEIS. It is intended to be used to evaluate environmental impacts during the decommissioning of nuclear power reactors as residual radioactivity at the site is reduced to levels that allow for termination of the NRC license. This Supplement addresses only the decommissioning of nuclear power reactors licensed by the NRC. It updates the sections of the 1988 GEIS relating to pressurized water reactors, boiling water reactors, and multiple reactor stations. It goes beyond the 1988 GEIS to explicitly consider high-temperature gas-cooled reactors and fast breeder reactors. This document can be considered a stand-alone document for power reactor facilities such that readers should not need to refer back to the 1988 GEIS. The environmental impacts described in this Supplement supercede those described for power reactor facilities in the 1988 GEIS.

The scope of this Supplement is based on the decommissioning activities performed to remove radioactive materials from structures, systems, and components from the time that the licensee certifies that it has permanently ceased power operations until the license is terminated. The scope of the document was determined through public scoping meetings and meetings with other Federal agencies and the nuclear industry. An evaluation process was then developed to determine environmental impacts from nuclear power reactor facilities that are being decommissioned. The evaluation process involved determining the specific activities that occur during reactor decommissioning and obtaining data from site visits and from licensees at reactor facilities currently being decommissioned. The data obtained from the sites were analyzed and then evaluated against a list of variables that defined the parameters for facilities that are currently operating but which will one day be decommissioned. This evaluation resulted in a range of impacts for each environmental issue that may be used for comparison by licensees that are or will be decommissioning their facilities.

Contents

Volume 2 Appendices N, O and P

| | |
|---|-----|
| Abstract | iii |
| Abbreviations/Acronyms | vii |
| Appendix N -Summary of Scoping Meetings | N-1 |
| Appendix O -Comments on the Draft Supplement and Staff Responses | O-1 |
| Appendix P -Public Meeting Transcript Excerpts and Written Comments | P-1 |

Abbreviations/Acronyms

| | |
|----------|---|
| μ Gy | microGray(s) |
| μ Sv | microSieverts |
| ac | acre(s) |
| AEA | Atomic Energy Act of 1954 |
| AEC | U.S. Atomic Energy Commission |
| ALI | annual limits on intake |
| ALARA | as low as reasonably achievable |
| ANPR | advance notice of proposed rulemaking |
| BLM | Bureau of Land Management |
| BMP | best management practice |
| Bq | Bequerel(s) |
| BWR | boiling water reactor |
| C | Celsius |
| CAA | Clean Air Act |
| CDE | committed dose equivalent |
| CEDE | committed effective dose equivalent |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CEQ | Council on Environmental Quality |
| CFR | Code of Federal Regulations |
| Ci | Curie |
| CWA | Clean Water Act |
| DAC | derived air concentration |
| dB | decibel |
| dBA | A-weighted sound levels |
| dB(C) | C-weighted sound levels |
| DBA | design basis accident |
| DDREF | dose or dose rate effectiveness factor |
| DE | dose equivalent |
| DNL | day-night average sound level |
| DOD | U.S. Department of Defense |
| DOE | U.S. Department of Energy |
| DOT | U.S. Department of Transportation |
| EA | environmental assessment |

Abbreviations/Acronyms

| | |
|-------|---|
| EDE | effective dose equivalent |
| EIS | environmental impact statement |
| EJ | environmental justice |
| EPA | U.S. Environmental Protection Agency |
| ER | environmental report |
| ESA | Endangered Species Act of 1973 |
| ES&H | environment, safety and health |
| | |
| F | Fahrenheit |
| FAA | Federal Aviation Administration |
| FBR | fast breeder reactor |
| FES | final environmental statement |
| FHA | Federal Housing Administration |
| FR | Federal Register |
| FSAR | Final Safety Analysis Report |
| ft | foot/feet |
| FWPCA | Federal Water Pollution Control Act (also known as the Clean Water Act of 1977) |
| FWS | U.S. Fish and Wildlife Service |
| | |
| gal. | gallon(s) |
| GEIS | Generic Environmental Impact Statement |
| gpd | gallons per day |
| gpm | gallons per minute |
| GTCC | Greater-than-Class-C (waste) |
| Gy | gray(s) |
| | |
| ha | hectare(s) |
| HDA | high decommissioning activity |
| HEPA | high-efficiency particulate air (filter) |
| HLW | high-level waste |
| h | hour |
| HTGR | high-temperature gas-cooled reactor |
| HUD | U.S. Department of Housing and Urban Development |
| HVAC | heating, ventilation, and air conditioning |
| | |
| IAEA | International Atomic Energy Agency |
| in. | inch(es) |
| I&C | instrumentation and control |
| ICRP | International Commission on Radiological Protection |

Abbreviations/Acronyms

| | |
|-------------------|---|
| ISFSI | independent spent fuel storage installation |
| kg | kilogram(s) |
| km | kilometer(s) |
| kV | kilovolt(s) |
| kWh | kilowatt hour(s) |
| L | liter(s) |
| LDA | low-decommissioning activity |
| LER | licensee event report |
| LET | linear energy transfer |
| LLW | low-level waste |
| LOS | level of service |
| LRA | license renewal application |
| LTP | license termination plan |
| LWR | light water reactor |
| m | meter(s) |
| m ³ /d | cubic meters per day |
| m ³ /s | cubic meters per second |
| MARSSIM | Multi-agency Radiation Survey and Site Investigation Manual, NUREG-1575 |
| MBTA | Migratory Bird Treaty Act of 1918 |
| mi | mile(s) |
| mGy | milliGray(s) |
| MPC | maximum permissible concentrations |
| mrad | millirad(s) |
| mrem | millirem(s) |
| MRS | monitored retrievable storage |
| mSv | milliSievert(s) |
| MTHM | metric tonnes of heavy metal |
| MT | metric ton(s) (or tonne[s]) |
| MTU | metric ton(s)-uranium |
| MW | megawatt(s) |
| MWd/MTU | megawatt-days per metric ton of uranium |
| MW(e) | megawatt(s) electric |
| MW(t) | megawatt(s) thermal |
| MWh | megawatt hour(s) |
| NA | not applicable |
| NAS | National Academy of Sciences |
| NBS | National Bureau of Standards |

Abbreviations/Acronyms

| | |
|-----------------|---|
| NCRP | National Council on Radiation Protection and Measurements |
| NEI | Nuclear Energy Institute |
| NEPA | National Environmental Policy Act of 1969 |
| NHPA | National Historic Preservation Act of 1966 |
| NIST | National Institute of Standards and Technology |
| NMFS | National Marine Fisheries Service |
| NO _x | nitrogen oxide(s) |
| NPDES | National Pollutant Discharge Elimination System |
| NRC | U.S. Nuclear Regulatory Commission |
| NRR | Nuclear Reactor Regulation |
| NWPA | Nuclear Waste Policy Act of 1982 |
| | |
| ODCM | Offsite Dose Calculation Manual |
| OSHA | Occupational Safety and Health Administration |
| | |
| PAG | protective action guide |
| PCBs | polychlorobiphenyls |
| PEL | permissible exposure limit |
| POL | possession-only license |
| PPE | personal protective equipment |
| PSDAR | post-shutdown decommissioning activities report |
| PV | pressure vessel |
| PWR | pressurized water reactor |
| | |
| QA/QC | quality assurance/quality control |
| | |
| RCRA | Resource Conservation and Recovery Act of 1976 |
| RCS | reactor coolant system |
| ROW | right-of-way/rights-of-way |
| RPV | reactor pressure vessel |
| | |
| SARA | Superfund Amendments and Reauthorization Act |
| SHPO | State Historic Preservation Officer |
| SI | Système Internationale (international system of units) |
| SO ₂ | sulfur dioxide |
| SO _x | sulfur oxide(s) |
| SSCs | structures, systems, and components |
| Sv | sievert(s) |

Abbreviations/Acronyms

| | | |
|---------|--|--|
| TEDE | total effective dose equivalent | |
| THPO | Tribal Historic Preservation Officer | |
| UNSCEAR | United Nations Scientific Committee on The Effects of Atomic Radiation | |
| USC | United States Code | |
| USFWS | U.S. Fish and Wildlife Service | |
| VOC | volatile organic compound | |
| VRM | Visual Resource Management (system) | |
| wk | week(s) | |
| YNPS | Yankee Nuclear Power Station | |
| yr | year(s) | |

Appendix N

Summary of Scoping Comments

Appendix N

Summary of Scoping Comments

On Tuesday, March 14, 2000, the U.S. Nuclear Regulatory Commission (NRC) published a Notice of Intent in the Federal Register (65 FR 13797), to notify the public of the staff's intent to prepare a supplement to the *Generic Environmental Impact Statement on Decommissioning Nuclear Facilities* (1988 GEIS), NUREG-0586, to support decommissioning activities at commercial power production facilities and to conduct scoping. This Supplement to the 1988 GEIS was prepared in accordance with the National Environmental Policy Act (NEPA 1969), Council on Environmental Quality guidelines, and 10 CFR Part 51. As outlined by NEPA, the NRC initiated the scoping process with the issuance of the Federal Register Notice. The NRC invited all stakeholders to participate in the scoping process by providing oral comments at the scheduled public meetings and/or submitting written suggestions and comments no later than July 15, 2000. The scoping process included four public scoping meetings, which were held in Lisle, IL, on April 27, 2000; Boston, MA, on May 17, 2000; Atlanta, GA, on June 13, 2000; and San Francisco, CA, on June 21, 2000. Approximately 60 members of the public attended the meetings. All four meetings began with NRC staff members providing a brief overview of the decommissioning and NEPA process. After the NRC's prepared statements, the meetings were open to public comments. Twenty-three attendees provided either oral or written statements that were recorded and transcribed by a certified court recorder. The corrected meeting transcripts were provided in four letters dated June 30, 2000 (NRC 2000a, 2000b, 2000c, 2000d) and are available on the NRC website at <http://www.nrc.gov/NRC/REACTOR/DECOMMISSIONING/GEIS/index.html>. In addition to the comments provided during the public meetings, 11 comment letters were received by the NRC in response to the Notice of Intent.

While developing this Supplement to the 1988 GEIS, the staff and its contractor considered all of the relevant issues raised during the scoping process. The full scoping summary report is accessible through NRC's Public Electronic Reading Room (ADAMS) website at <http://www.nrc.gov/NRC/ADAMS/index.html>; the accession number is ML011100625. Each comment that was applicable to this Supplement is summarized in this section. This information was extracted from the Scoping Summary Report, dated April 17, 2001 (65 FR 13797) and is being provided in this report for the convenience of those interested in the scoping comments applicable to this environmental review. The comments that were determined to be general or outside the scope of Supplement are not included in this Appendix.

Appendix N

Meetings

| Location | Date |
|-------------------|----------------|
| Lisle, IL | April 27, 2000 |
| Boston, MA | May 17, 2000 |
| Atlanta, GA | June 13, 2000 |
| San Francisco, CA | June 21, 2000 |

Written Comment Letters

| Name/Organization | Date |
|--|---------------|
| Nuclear Information and Resource Service | July 11, 2000 |
| Pamela Blockey-O'Brien | July 12, 2000 |
| Nuclear Information and Resource Service (submitted a supplement to the letter they originally sent) | July 13, 2000 |
| Lynnette Hendricks (Nuclear Energy Institute) | July 14, 2000 |
| Massachusetts Citizens for Safe Energy | July 14, 2000 |
| Campaign for a Prosperous Georgia | July 14, 2000 |
| Paul Gunter (Nuclear Information and Resource Service) | July 14, 2000 |
| George Crocker (Executive Director of the North American Water Office) | July 14, 2000 |
| Citizens Awareness Network | July 15, 2000 |
| Glenn Carroll (Georgians Against Nuclear Power) | July 15, 2000 |
| George A. Zinke (Director, Nuclear Safety & Regulatory Affairs, Maine Yankee Atomic Power Co.) | July 17, 2000 |

Generic Environmental Impact Statement - Public Scoping Meeting Comments and Responses in Scope

1. Why is the GEIS being updated?

Three commenters (five comments) inquired about the reason that the NRC decided to update the GEIS. The question was raised whether the update was based on new information such as worker exposure, volume of high- or low-level radioactive waste, differences in disposal methodologies or decommissioning options, such as options in addition to entombment and rubbleization. One commenter asked if the NRC had already found new information that would make the GEIS more conservative.

Response: *The basis for this Supplement is discussed in Chapter 1, Introduction. This comment is within the scope of this Supplement.*

One commenter (in two different comments) questioned the creation of the GEIS if decommissioning is not a major Federal action and also indicated that the GEIS and the decommissioning process are the "deregulation of decommissioning."

Response: *The update of the GEIS as related to the National Environmental Policy Act (NEPA) of 1969 is discussed in Chapter 1, Introduction. This comment is within the scope of this Supplement.*

Four commenters expressed concern that the revisions to the GEIS would be used in negative ways such as to serve private corporate nuclear industry interests, to allow a release of unnecessary radioactive material onsite and offsite, or to reduce liability for the nuclear industry and increase environmental damage and public health. One commenter indicated that the GEIS should regulate all forms of radioactive releases.

Response: *The appropriate uses of the Supplement are discussed in Chapter 1, Introduction. This comment is within the scope of this Supplement.*

Three commenters (four comments) agreed with the NRC's efforts to update the 1988 GEIS on decommissioning. One commenter indicated that the Supplement should be updated to incorporate and evaluate new decommissioning technologies developed over the past decade. A second commenter specified that rubbleization should be considered.

Appendix N

Response: *One of the purposes of revising the GEIS is to incorporate and evaluate new decommissioning technologies and methods such as rubblization. This comment is within the scope of this Supplement. Technologies and methods are incorporated into the discussion and analysis in Chapter 4, Environmental Impacts.*

2. How will the GEIS be used?

One commenter inquired as to how the GEIS would be used.

Response: *The appropriate uses of this Supplement are discussed in Chapter 1, Introduction. This comment is within the scope of this Supplement.*

One commenter encouraged the NRC to make the Supplemental GEIS user-friendly with plain English and straightforward explanations for the public.

Response: *The NRC has specific criteria that must be met in publications that are related to the usage of plain English. This comment is within the scope of this Supplement and incorporated throughout the document.*

3. Will the GEIS satisfy the NEPA process?

One commenter asked about the actions and reviews involved in determining if the environmental impact concerns considered by the NRC sufficiently satisfy the NEPA requirements.

Response: *The relationship between the GEIS and the NEPA requirements are discussed in Chapter 1, Introduction. This comment is within the scope of this Supplement.*

One commenter asked if the NRC was planning to communicate the results of the scoping meetings and the final scope of the GEIS to the public.

Response: *The NEPA process provides for publishing and presentation of a draft report for comment before the final Supplement is issued. The comments noted in this summary report as being within the scope of the GEIS are addressed in this Supplement. Comments on the Supplement are solicited and considered before the report is finalized. This comment is within the scope of this Supplement.*

One commenter asserted that the NRC made false assumptions in the GEIS and indicated that these assumptions must be addressed and the true risk discovered before any further generic considerations are implemented.

Response: *The assumptions in the 1988 GEIS have been reconsidered in the development of this Supplement. This comment is within the scope of this Supplement and is discussed in Chapter 1, Introduction, and Chapter 4, Environmental Impacts.*

One commenter indicated that decommissioning was a Federal major action and required NEPA compliance and site-specific EISs.

Response: *Chapter 1, the introduction to this Supplement, describes the NEPA requirements for site-specific EISs and the basis for the agency's determination that decommissioning is not a Federal major action. This comment is within the scope of this Supplement.*

One commenter stated that the 1988 GEIS is a robust analysis that has stood the test of time. They supported a Supplement at this time.

Response: *A discussion of the use of the previous GEIS is provided in Chapter 1, Introduction. This comment is within the scope of this Supplement.*

4. Reactors that will be included in the GEIS

One commenter thought the GEIS should be explicit regarding which reactors were covered. The commenter was specifically concerned about Peach Bottom and Fermi.

Response: *The applicability of this Supplement to specific reactor facilities is discussed in Chapter 1, Introduction. This comment is within the scope of this Supplement.*

One commenter indicated that it was prudent at this time to incorporate issues that were identified through actual experience and to include issues relevant to the limited number of commercial non-light-water reactors.

Response: *The use of data from previous reactor decommissioning experience is discussed throughout this Supplement. This comment is within the scope of this Supplement.*

5. Decommissioning Activities

A. General Decommissioning Activities

One commenter inquired how the GEIS would handle two different methodologies for the same activity (such as removing steam generators as a whole or in pieces).

Appendix N

Response: This Supplement considers different methods for an activity to determine an acceptable envelope for that activity. If an activity results in impacts that are outside the envelope, then a site-specific assessment may be required. The process for developing this Supplement is described in Chapter 1, Introduction, further discussed in Chapter 4, Environmental Impacts, and described in more detail in Appendix E. This comment is within the scope of this Supplement.

One commenter indicated that the GEIS should provide more detail about specific decommissioning activities and technologies in order to accurately assess the associated environmental impacts. Another commenter indicated that they did not agree with the statement that decommissioning activities are not significantly different from operating the plant.

Response: This Supplement considers specific decommissioning activities. The process for developing this Supplement is described in Chapter 1, Introduction, further discussed in Chapter 4, Environmental Impacts, and described in more detail in Appendix E. This comment is within the scope of this Supplement.

B. Decommissioning Options

One commenter encouraged the NRC to adequately address alternatives. A second commenter inquired whether a preferred alternative would be specified in the GEIS.

Response: Chapter 5 of this Supplement discusses alternatives to the proposed action, as required by the NEPA process. This comment is within the scope of this Supplement.

1. DECON

No comments within scope.

2. SAFSTOR

One commenter encouraged the use of the SAFSTOR option because of the advantages in terms of exposure to workers and the public. Another reason for the commenter's support of SAFSTOR as an option was their opposition to shallow land burial of radioactive waste.

Response: In Chapter 3, Description of Reactors, this Supplement addresses the options for decommissioning activities, including SAFSTOR and variations to SAFSTOR (such as the duration of the storage period or the use of incremental DECON, which includes incremental decontamination and dismantlement activities during the SAFSTOR period). This comment is within the scope of this Supplement.

3. Entombment

One commenter asked what factors had changed since the 1988 GEIS that would suggest that ENTOMB was a possible option. A second commenter suggested that the lack of dumps for contaminated material made entombment a viable solution. A third commenter asked why entombment was considered not to be viable. And a fourth commenter inquired why the NRC would even be considering entombment if they already knew that the residual levels of radio-activity would be unacceptable.

Response: *This Supplement addresses varying options for decommissioning activities, including ENTOMB in Chapter 3, Description of Reactors. These comments are within the scope of this Supplement.*

One commenter encouraged the NRC to address entombment and to consider a name change to SAFSTOR II or Assured Isolation.

Response: *This Supplement addresses varying options for decommissioning activities, including ENTOMB in Chapter 3, Description of Reactors. This comment is within the scope of this Supplement.*

One commenter indicated that a Supplemental EIS must be required for the entombment option to assess the impact of what they perceive to be near-surface dumping of greater than Class C (GTCC) waste.

Response: *This Supplement addresses varying options for decommissioning activities including ENTOMB in Chapter 3, Description of Reactors. This comment is within the scope of this Supplement.*

4. Rubblization

Five commenters indicated that rubblization was an area that needed to be addressed in the revised GEIS. One commenter also added in a second comment that this included the environmental impact of residual radioactive material deeper than 6 in. below the surface, activated concrete, activated rebar, internal contamination in cracks, and sub-slab contamination. One of the commenters recommended that an additional intruder scenario be addressed.

Response: *This Supplement considers various decommissioning activities including rubblization in Chapter 4, Environmental Impacts. These comments are within the scope of this Supplement.*

Appendix N

Two commenters indicated that rubbleization turns the reactor site into a low-level or perhaps high-level radioactive waste site and that deep monitoring wells, liners, etc., should be required and evaluated on a site-specific basis. One commenter also mentioned that salt-water corrosion should be evaluated because of the potential for some leakage from the facility if the waste is left onsite, such as occurs in rubbleization.

Response: *This Supplement considers various decommissioning activities including rubbleization in Chapter 4, Environmental Impacts. These comments are within the scope of this Supplement.*

5. Partial Site Release

Three commenters stated that partial site release should be addressed in the GEIS. One commenter inquired whether partial site release would be addressed in the Supplement. Another commenter stated that they opposed partial site release.

Response: *This Supplement considers partial site release and whether it can be included as a generic issue. Discussion of partial site release can be found in Chapter 1, Introduction. These comments are within the scope of this Supplement.*

C. Specific Activities to be included in the GEIS

1. Decommissioning Process

No comments within scope.

2. Post-Shutdown Decommissioning Activities Report (PSDAR)

One commenter was concerned that the only time a site-specific analysis would be conducted for a decommissioning plant would be if the facility failed the PSDAR.

Response: *This Supplement discusses the circumstances that will result in a site-specific analysis in Chapter 2, Introduction. This comment is within the scope of the GEIS.*

3. Public Meetings

No comments within scope.

4. Citizen Advisory Panels

No comments within scope.

5. Opportunity for Public Hearings

No comments within scope.

6. Inspections

No comments within scope.

7. Removal of Resident Inspectors

No comments within scope.

8. Intact Vessel Removal

Two commenters indicated that intact removal of the reactor vessel should be considered in the Supplement. One of the commenters actively advocated this alternative because of reduced worker dose, costs, and excellent isolation of the waste packages.

Response: *This Supplement considers specific decommissioning activities including intact removal of the reactor vessel. Decommissioning activities are discussed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

9. Spent Fuel

One commenter indicated that the delay in the schedule for removal of spent fuel should be reflected in the GEIS as far as decommissioning schedule, costs, and doses.

Response: *This Supplement addresses the impacts resulting from the variation in the timing of activities such as the removal of the spent fuel from the pool. This issue is addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

10. Waste Disposal

No comments within scope.

11. Waste Transport

One commenter asked what kind of transportation activities will be covered in the Supplement.

Response: *This Supplement considers impacts associated with the transportation of waste from the facility and transportation of equipment into the facility. The issue of transportation is addressed in Section 4.3.16, Transportation. This comment is within the scope of this Supplement.*

12. Offsite Cleanup

No comments within scope.

13. Site Characterization and Final Site Surveys

No comments within scope.

14. License Termination Plan - Timing of Submittal

No comments within scope.

15. License Termination Plan - Contents

No comments within scope.

16. License Termination Criteria

No comments within scope.

17. Life after License Termination

No comments within scope.

18. Reuse of Material

No comments within scope.

19. Transfer of Ownership

No comments within scope.

20. Financial Assurance

No comments within scope.

21. License Extensions

No comments within scope.

22. Safety of Decommissioning

No comments within scope.

6. Impacts that should be included or considered in the Supplement

A. Ecological Impacts

Three commenters (in four different comments) indicated that decommissioning has environmental impacts and that the GEIS should include an analysis of the environment and not just an analysis of impacts on humans.

Response: *The environmental impacts of decommissioning are addressed in this Supplement. Ecological issues are addressed in Chapter 4, Environmental Impacts. These comments are within the scope of this Supplement.*

One commenter recommended that the GEIS assess the degree to which the environmental parameters of the site may have changed during the operation of the facility.

Response: *This Supplement may include a consideration of the degree to which environmental parameters of the site may have changed during operation. Ecological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter recommended that the GEIS take into account the relevant environmental characteristics of the site and the impacts from the use of the decommissioning techniques.

Response: *Relevant characteristics of the commercial nuclear power facility sites are being considered in the development of this Supplement. The impacts from the use of decommissioning techniques are also considered. Site characteristics and decommissioning techniques are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

Appendix N

One commenter recommended that land use, water use, air quality, and animal and human life be included in the GEIS as environmental impacts.

Response: *Ecological impacts such as land use, water use, air quality, and the impact on animals and humans are considered in this Supplement. Ecological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

Two commenters recommended a mesh screen to prevent birds from landing and nesting on the site. Another recommended sterilizing the wildlife and containing them to allow them to die naturally in order to keep them from passing on genetic material.

Response: *The impacts of the decommissioning process on the terrestrial environment are considered in this Supplement. Mitigative actions will be considered if necessary. Ecological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

B. Groundwater

Three commenters expressed concern about contamination in ground or surface water. Commenters indicated that studies should be conducted related to leaking pipes or plumes of contamination in the groundwater. One commenter specified that protocols should be in place that would be adhered to, particularly for underwater drilling. A third commenter thought that appropriate methodologies should be included to determine groundwater contamination before decommissioning occurs.

Response: *The impact of potentially contaminated groundwater is considered in this Supplement. Water quality issues are addressed in Chapter 4, Environmental Impacts. These comments are within the scope of this Supplement.*

One commenter cautioned that impacts to groundwater specifically from rubblization should not be underestimated.

Response: *The radiological impacts of rubblization for the period beyond the license termination must meet the requirements in 10 CFR Part 20, Subpart E, before the license will be terminated. Impacts to groundwater during the decommissioning period and nonradiological impacts following the termination of the license are generically addressed in this Supplement. Water quality issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

Two commenters recommended that wells be monitored within five miles of the facility and that specific actions be taken if contamination is found.

Response: *Monitoring of effluents during decommissioning are addressed in this Supplement. Water quality issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter indicated that all plumes must be traced, blocked, pumped, and filtered. Another commenter recommended pumping groundwater through resin beds, sand filters, and charcoal filters.

Response: *An evaluation of the impact of potentially contaminated water is considered in this Supplement. Mitigative measures are discussed, as appropriate. Water quality issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of the GEIS.*

C. Surface Water

Two commenters indicated that sediment up to a mile downstream from the discharge "valves" should be removed and treated as hazardous waste.

Response: *The staff is uncertain as to the meaning of "discharge valve" but is responding to this question assuming the commenters meant the discharge structure. An evaluation of the impact of potentially contaminated sediment and its removal during the decommissioning process is considered within this Supplement. Mitigative measures are discussed as appropriate. Water quality issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter recommended routing site runoff to covered detention ponds equipped with filters, etc.

Response: *An evaluation of the impacts to surface water is considered in this Supplement. Mitigative measures are discussed as appropriate. Water quality issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

D. Radiological Concerns

One commenter requested that NRC include a definition of background radiation in the GEIS. It should be clear whether the background was measured before or after 1945.

Response: *This Supplement uses the NRC's definition of background radiation as given in 10 CFR 20.1003 as the basis for any discussion of radiological impacts. The background for a particular site would correspond to the background radiation levels determined at the time that the Final Environmental Impact Statement for the facility was issued. Radiological issues are*

Appendix N

addressed in Chapter 4, Environmental Impacts. This comment is within the scope of the GEIS.

E. Occupational Dose Impacts

One commenter indicated that the dose estimates for decommissioning activities should be revised and that an envelope should be used to account for attempts to use certain techniques that may not be the best way to solve the problem.

Response: *This Supplement addresses the occupational dose estimates for decommissioning. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter recommended that a good look be taken at the radiation exposure projections and that the projected exposure should be a good challenge for the industry.

Response: *This Supplement addresses the occupational dose estimates for decommissioning. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of the GEIS.*

One commenter recommended that a comparison be made of the dose estimates if the facility is decommissioned initially or if decommissioning does not start for 2 years.

Response: *The timing of activities and its impact on the anticipated radiological dose for a decommissioning facility are considered in this Supplement. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter encouraged caution in comparing risks among processes. The commenter recommended that all the aspects of different processes be considered and that the comparisons be compatible.

Response: *The comment is noted. The impacts of decommissioning activities are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter thought the scientific studies that have been performed since 1988 that show that radiation is more harmful to human health should also be included.

Response: *This Supplement will include a determination of the impacts on human health from the potential radiological dose. The discussion will be based on current scientific guidelines. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter indicated that the total dose should be a very high priority.

Response: *This Supplement includes an analysis of the dose impacts of decommissioning. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter suggested that exposure levels for workers are monitored every day and tallied every week or so and tracked against the limits given in the GEIS. A second commenter indicated that worker doses during decommissioning have been repeatedly underestimated because decommissioning is an experiment and there is a lack of experience and enforcement by the NRC. A third commenter specifically identified Connecticut Yankee as underestimating worker dose assessments and predictions.

Response: *This Supplement includes an analysis of impacts of radiation dose to workers due to decommissioning. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter recommended that the GEIS include estimates for worker inhalation of materials of high specific activity that have been vaporized and particulated by a particular decommissioning operation.

Response: *This Supplement includes an analysis of the impact of radiation dose to workers during decommissioning. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

F. Public Dose Impacts

One commenter thought the NRC did not deal with incidental contamination that affected a community, but focused instead on contamination from processes. The implication was that an analysis of incident contamination and its effect on the community should be included in the GEIS. Three other commenters specified the inadvertent release of hot particles and the routine decommissioning releases as jeopardizing health and safety of the public. One other commenter (in two comments) thought the health and safety problems needed to be taken more seriously.

Response: *The incidental contamination and inadvertent release of hot particles are unplanned releases and are handled on a site-specific basis and are not within the scope of this Supplement. An analysis of the routine decommissioning releases on the health and safety of the public are within the scope of this Supplement and are considered. Radiological issues are addressed in Chapter 4, Environmental Impacts.*

Appendix N

One commenter thought the dose to the public from shipment of material to other locations should be included in the consideration of dose from decommissioning a facility.

Response: *The dose to the public during transportation of radioactive material to disposal facilities are considered in this Supplement. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter indicated that the priority of the whole process was not the decommissioning of the sites, but rather the protection of public health and the environment.

Response: *The NRC's mission includes the protection of public health and safety, the common defense and security, and the protection of the environment. The NRC's mission influences the entire decommissioning process. Public safety and protection of the environment are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter expressed concern over the issue of hot particles and their impact on the community.

Response: *The inadvertent or accidental release of hot particles is handled on a site-specific basis. Analysis of contamination that is removed from the site into the public realm is considered to be an accident and would be treated as such in this Supplement. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

One commenter stated that NRC should not recalibrate and redefine background radiation levels so that they include regular plant operations, accidents, and weapons testing.

Response: *This Supplement uses the NRC's definition of background radiation as given in 10 CFR 20.1003 as a basis for any discussion of radiological impacts. Radiological issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of the GEIS.*

G. Transportation Dose Impacts

One commenter indicated that transportation doses should be considered and any site-specific issues. One commenter indicated that the changes in the transportation dose since 1988 (in the programs and methodologies that are used) warrant a revision in this area in the GEIS.

Response: *The transportation dose to the public and workers from the transport of wastes are within the scope of this Supplement. Transportation issues are addressed in Chapter 4, Environmental Impacts.*

H. Nonradiological Impacts

One commenter encouraged the incorporation of nonradiological contaminants into the GEIS. Four commenters expressed concern over nonradiological impacts of decommissioning. Two of the commenters specifically mentioned nonradiological impacts such as polychlorobiphenyls, heavy metals, and concrete. Another commenter inquired where the information would be obtained that related to nonradiological issues. Another commenter asked if nonradiological issues would be addressed in the license termination plan. (It was uncertain if this commenter thought this would also apply to the GEIS).

Response: *Nonradiological chemical hazards are regulated by the provisions of the Resource Conservation and Recovery Act (RCRA 1976). Most states have received authority from the U.S. Environmental Protection Agency (EPA) to regulate and enforce RCRA. The EPA controls hazardous waste storage, treatment, and disposal in those states that do not have this authority. Mixed waste (hazardous waste that contains radioactive material) is subject to regulation by the NRC under the Atomic Energy Act, as amended (AEA 1954), and by EPA under RCRA, as amended. Nonradiological chemical hazards are addressed in this Supplement as they relate to the radiological decommissioning of the facility. Nonradiological issues are addressed in Chapter 4, Environmental Impacts. Mixed waste (radiological contamination that is mixed with chemical contamination) are within the scope of this Supplement.*

1. Public Health Impacts (Nonradiological)

Two commenters discussed the spread of contamination into the community. One of the commenters recommended that the GEIS address health problems in the community as a result of contamination in the community.

Response: *This Supplement considers health impacts to the community as a result of radiation dose, noise, and transportation accidents. Public health issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

J. Socioeconomic Impacts

Two commenters indicated that community impacts are not adequately addressed in the GEIS and need to be looked at more carefully.

Response: *This Supplement considers socioeconomic impacts. Socioeconomic issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

K. Cultural Resource Impacts

One commenter inquired if the facilities are required to adhere to the National Park Service's requirement for Historic American Engineering Records and the Historic Architectural Building requirements.

Response: *Cultural resources are considered in this Supplement and are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

L. Cost Impacts

Two commenters recommended that the NRC take a look at the decommissioning projects or sites in detail to see if cost estimates do or do not match the final results. One of the commenters specifically addressed the variation in cost with time.

Response: *The cost of decommissioning is included in this Supplement. The variation in the cost estimates based on different start and end times of decommissioning are also considered. Cost issues are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of the Supplement.*

Two commenters thought that the storage of spent fuel should be considered as part of the decommissioning costs. One commenter also recommended that the removal of nonradioactive structures should be considered as part of the decommissioning costs.

Response: *The dismantlement of nonradioactive structures is not considered as part of the radiological decommissioning of the site unless it is necessary to remove a structure in order to complete the radiological decommissioning of the facility. However, the removal of structures that were necessary for the production of power are included in this Supplement for the sake of completeness even if the structures are not part of the radiological decommissioning of the site. Structure dismantlement issues are within the scope of this Supplement and are addressed in Chapter 4, Environmental Impacts. The management and funding for the storage of spent fuel is required by 10 CFR 50.54 and is regulated separately from the decommissioning costs. This comment is not within the scope of this Supplement.*

One commenter recommended placing the facility in SAFSTOR as a means to allow more time to gather money for decommissioning and to look at the availability of low-level waste sites.

Response: *The regulations for the accrual of funds for decommissioning are given in 10 CFR 50.75 and are not within the scope of this Supplement. However, the cost benefits of various decommissioning options are considered, and are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

M. Environmental Justice

Three commenters suggested that an analysis of the impacts of decommissioning on environmental justice be considered in the Supplement.

Response: *An analysis of environmental justice is included in this Supplement in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

N. Impacts of Fuel Storage

No comments within scope.

O. Cumulative Impacts

One commenter recommended that the whole picture be looked at with regards to the overall purpose and the environmental effects of the combined decommissioning options.

Response: *Cumulative impacts are within the scope of this Supplement and are considered in Chapter 4, Environmental Impacts.*

One commenter recommended that the GEIS include a description and analysis of cumulative impacts for each waste stream in the community, including transportation routes, NRC and DOE facilities, and proposed sites for waste management, storage, and disposition.

Response: *Cumulative impacts related to the decommissioning of the site are considered in this Supplement. Impacts related to transportation of the waste and to irretrievable commitment of land for waste storage are also considered in this Supplement. Cumulative impact, transportation, and retrieval resource impacts are addressed in Chapter 4, Environmental Impacts. Cumulative impacts from waste management, storage, and disposition facilities are not within the scope of this Supplement.*

7. Site-Specific Information versus Generic Information

Two commenters asked how impacts or site conditions will be addressed - if they would be handled generically in the GEIS or on a site-specific basis.

Response: *Ecological and environmental issues have been considered to determine if they are generic issues that should be included in this Supplement. Those issues determined not to be generic and that require a site-specific assessment are identified in this Supplement, in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

Two commenters asked how site-specific conditions such as groundwater pathways would be

Appendix N

considered in the Supplement. If they would be considered generically or on a site-specific basis.

Response: *Ecological and environmental issues have been considered to determine if they are a generic issue that should be included in this Supplement. Those issues determined not to be generic and that require a site-specific assessment are identified in this Supplement, in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

Eight commenters (in 16 different comments) asked about the situations and rules for triggering a site-specific environmental impact assessment. Specific examples of items that might trigger a site-specific analysis include contamination in pools and under reactor sites, coastal and flood plain issues, seismology, background radiation, pollution, reactor types, geology, operating experiences, land use, economy, synergistic effects of other toxins or industries in the area, decommissioning techniques, uniqueness of the site soil contamination, and river sediments.

Response: *This Supplement discusses the issue of site-specific versus generic environmental impacts in Chapter 4, Environmental Impacts. These comments are within the scope of this Supplement.*

Six commenters (nine comments) indicated that, in general, a site-specific impact statement or a set of guidelines that the utilities need to consider during decommissioning might be more appropriate than a GEIS because of the site-specific nature of decommissioning. One of the commenters thought that the question of what does and does not legitimately constitute site-specific factors in need of an EIS are economically driven instead of safety driven.

Response: *This Supplement will discuss the issue of site-specific versus generic environmental impacts in Chapter 4, Environmental Impacts. These comments are within the scope of this Supplement.*

8. Incorporation of Information from Previously Developed EISs

One commenter recommended that the Supplement address whether and how to incorporate findings from the EISs for plant construction and operation, analyses that have accrued during plant operations, and reports on referenced facilities.

Response: *Chapter 1, Introduction, in this Supplement discusses the interface between this Supplement for decommissioning and the EISs for plant construction, operation, and license renewal. This comment is within the scope of this Supplement.*

9. Methodology

A. Methodology - Process

One commenter recommended that decommissioning be treated as an activity separate from operations.

Response: *Environmental impacts from decommissioning activities are specifically addressed (and separately from impacts of operation) in this Supplement. Environmental impacts are considered in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

B. Determination of Boundary Conditions

One commenter asked how the boundary conditions for the GEIS would be determined. The commenter then proceeded to recommend several methods for determining boundary conditions for waste volumes.

Response: *This Supplement has been developed by collecting a reasonable range of information from the sites that are undergoing decommissioning and using that information to set boundaries for environmental impacts. Environmental Impacts are addressed in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

C. Changing the Parameters from the Initial Study

One commenter recommended that the existing GEIS be used as a baseline and that it should be supplemented in those areas where additional information is available. This would allow those licensees currently undergoing decommissioning to remain enveloped and those that are using the GEIS to evaluate a future decommissioning would have more up-to-date information.

Response: *The 1988 GEIS is being supplemented based on additional information and decommissioning experience and history. The analysis in Chapter 4, Environmental Impacts, and the corresponding appendices contain the data used for evaluating the environmental impacts. This comment is within the scope of this Supplement.*

10. Mitigation

One commenter recommended that the NRC adequately address mitigation in the GEIS or a site-specific analysis.

Response: *Mitigation is within the scope of this Supplement and is addressed in Chapter 1, Introduction, and Chapter 4, Environmental Impacts.*

11. Grandfathering

Three commenters asked about the impact of the new Supplement on facilities that have shut down and are in compliance with the 1988 GEIS.

Response: *The use of this Supplement by facilities that have previously shut down is addressed in this Supplement in Chapter 1, Introduction, and Chapter 4, Environmental Impacts.*

12. Regulations

A. Relationship to Other Regulations

One commenter thought the GEIS should address the relationship with other NRC regulations, such as site-release criteria.

Response: *The relationship between this Supplement and other NRC regulations or EISs is discussed in Chapter 1, Introduction. This comment is within the scope of this Supplement.*

One commenter recommended that NRC treat all problems and areas of concern as "site-specific problems" rather than as generic industry problems.

Response: *This Supplement identifies issues that require a site-specific analysis. Site-specific issues are addressed in Chapter 4, Environmental Impacts. This comment was within the scope of this Supplement.*

13. Scoping Meetings - Schedule, Substance, etc.

No comments within scope.

14. Comments Related to Specific Nuclear Power Plants

Three commenters addressed the use of rubbleization as an activity for decommissioning at Maine Yankee. One commenter agreed that the NRC needed to fulfill their responsibilities related to NEPA. A second commenter believed that a full environmental assessment should be made to determine if a site-specific EIS is necessary. A third commenter strongly opposed any delay in a specific plant initiative based on the Supplement to the GEIS.

Response: *Rubbblization is addressed by this Supplement. Specific areas or activities requiring site-specific analyses are also addressed. Rubblization and site-specific issues are considered in Chapter 4, Environmental Impacts. This comment is within the scope of this Supplement.*

N.1 References

10 CFR 20. Code of Federal Regulations, Title 10, *Energy*, Part 20, "Standards for protection against radiation."

10 CFR 50. Code of Federal Regulations, Title 10, *Energy*, Part 50, "Domestic licensing of production and utilization facilities."

10 CFR 51. Code of Federal Regulations, Title 10, *Energy*, Part 51, "Environmental protection regulations for domestic licensing and related regulatory functions."

65 FR 13797. "Notice of Intent to Prepare a Supplement to the Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities and to Hold Public Meetings for the Purpose of Scoping and to Solicit Public Input into the Process." Nuclear Regulatory Commission. *Federal Register*. March 14, 2000.

Atomic Energy Act of 1954, as amended, 42 USC 2011 et seq.

National Environmental Policy Act (NEPA) of 1969, as amended, 42 USC 4321 et seq.

Resource Conservation and Recovery Act (RCRA) of 1976, as amended by the Hazardous and Solid Waste Amendments Act of 1984, 42 USC 6901 et seq.

U.S. Nuclear Regulatory Commission (NRC). 1988. *Final Generic Environmental Impact Statement on Decommissioning of Nuclear Facilities*. NUREG-0586, NRC, Washington, D.C.

U.S. Nuclear Regulatory Commission (NRC). 2000a. Letter from NRC to "People who Requested a Copy of Meeting Transcript for GEIS Public Scoping Meeting on April 27, 2000 in Lisle, Illinois." Dated June 30, 2000.

U.S. Nuclear Regulatory Commission (NRC). 2000b. Letter from NRC to "People who Requested a Copy of Meeting Transcript for GEIS Public Scoping Meeting on May 17, 2000 in Boston, Massachusetts." Dated June 30, 2000.

U.S. Nuclear Regulatory Commission (NRC). 2000c. Letter from NRC to "People who Requested a Copy of Meeting Transcript for GEIS Public Scoping Meeting on June 13, 2000 in

Appendix N

Atlanta, Georgia.” Dated June 30, 2000.

U.S. Nuclear Regulatory Commission (NRC). 2000d. Letter from NRC to “People who Requested a Copy of Meeting Transcript for GEIS Public Scoping Meeting on June 21, 2000 in San Francisco, California.” Dated June 30, 2000.

Appendix O

Comments on the Draft Supplement and Staff Responses

Contents

| | |
|---|-------|
| Introduction | O-1 |
| O.1 Impacts | O-29 |
| O.1.1 Onsite/Offsite Land Use | O-29 |
| O.1.2 Surface and Groundwater Quality and Use | O-31 |
| O.1.3 Air Quality | O-39 |
| O.1.4 Ecology | O-44 |
| O.1.5 Threatened and Endangered Species | O-53 |
| O.1.6 Radiological | O-54 |
| O.1.7 Decommissioning Accidents | O-79 |
| O.1.8 Occupational (Nonradiological) Impacts | O-84 |
| O.1.9 Cost Impacts | O-88 |
| O.1.10 Socioeconomics | O-102 |
| O.1.11 Environmental Justice | O-109 |
| O.1.12 Cultural Resources | O-111 |
| O.1.13 Aesthetics | O-112 |
| O.1.14 Noise | O-113 |
| O.1.15 Transportation/Transportation Dose Impacts | O-114 |
| O.1.16 Conclusions | O-118 |
| O.2 NRC Experience, Role and Regulations | O-126 |
| O.2.1 NRC Experience with Decommissioning | O-126 |
| O.2.2 NRC Role | O-129 |
| O.2.3 Decommissioning Duration and Options | O-146 |
| O.2.3.1 Decommissioning Duration | O-146 |
| O.2.3.2 Decommissioning Options | O-148 |
| O.2.3.3 Entombment | O-151 |
| O.2.3.4 Rubblization | O-162 |
| O.2.4 Safety of Decommissioning | O-170 |
| O.2.4.1 Issues Related to Terrorist Events | O-170 |
| O.2.4.2 Safety of Decommissioning | O-174 |
| O.2.4.3 Risk-Informed Regulations | O-176 |
| O.3 Decommissioning Process | O-177 |
| O.4 Out-of-Scope Issues | O-183 |
| O.4.1 Reuse of Materials Offsite | O-183 |
| O.4.2 Partial Site Release | O-188 |
| O.4.3 Disposal of Low-Level Radioactive Waste | O-190 |
| O.4.4 Spent Fuel Maintenance, Storage, and Disposal | O-198 |

Appendix O

| | | |
|--------|--|-------|
| O.4.5 | License Extensions | O-206 |
| O.4.6 | Site Characterization and Final Site Surveys | O-207 |
| O.4.7 | License Termination Criteria | O-212 |
| O.4.8 | Beyond License Termination | O-216 |
| O.4.9 | Ownership | O-223 |
| O.4.10 | Financial Assurance | O-226 |
| O.5 | NEPA-Related Issues | O-233 |
| O.5.1 | Process for Developing the GEIS | O-233 |
| O.5.2 | Public Meetings and Public Participation | O-234 |
| O.5.3 | Request for Additional Comment Period | O-244 |
| O.5.4 | Determination of Scope | O-245 |
| O.5.5 | Definition and Discussion of SMALL, MODERATE and LARGE Impacts | O-252 |
| O.5.6 | Time Frame for Assessing Environmental Impacts | O-257 |
| O.5.7 | Reactors Included in the GEIS Analysis | O-258 |
| O.5.8 | Application of NEPA Process to Decommissioning | O-259 |
| O.5.9 | Opposition to Use of Generic Impacts | O-261 |
| O.6 | General | O-266 |
| O.6.1 | Clarifications and Recommendations Related Specifically to Supplement 1 | O-266 |
| O.6.2 | Clarification Questions | O-284 |
| O.6.3 | Statements for or Against Nuclear Power | O-287 |
| O.6.4 | Comments in Support of Decommissioning | O-289 |
| O.6.5 | General Comments | O-290 |

Table

| | | |
|-----|-------------------|-----|
| O.1 | Comment Log | O-3 |
|-----|-------------------|-----|

Appendix O

Comments on the Draft Supplement and Staff Responses

Introduction

On November 9, 2001 a notice of availability was published by the U.S. Nuclear Regulatory Commission in the Federal Register (66 FR 56721) announcing the publication of the *Generic Environmental Impact Statement on Decommissioning Nuclear Facilities, Draft Report for Comment* (NUREG-0586, Supplement 1). The draft Supplement was published for comment by Federal, State, and local government agencies as well as interested members of the public. As part of the process to solicit public comments on the draft Supplement, the staff:

- placed a copy of the draft Supplement into the NRC's electronic Public Document Room,
- sent copies of the draft Supplement to certain Federal, State, and local agencies,
- provided a copy of the draft Supplement to any member of the public that requested one free of charge,
- sent copies of the draft Supplement to identified public interest groups and concerned citizens in the vicinity of all 22 power reactors undergoing decommissioning,
- published a notice of availability of the draft Supplement in the Federal Register on November 9, 2001 (66 FR 56721), and
- announced and held public meetings in San Francisco, California on December 4, 2001, Chicago, Illinois on December 6, 2001, in Boston, Massachusetts on December 10, 2001, and in Atlanta, Georgia on December 12, 2001 to describe the results of the environmental review and answer related questions.

During the comment period, the staff received a total of 52 comment letters in addition to the comments received during the transcribed public meetings.

Appendix O

The staff has reviewed the public meeting transcripts and the 52 comment letters that are part of the docket file for the application, all of which are available in the NRC's Electronic Public Document Room (ADAMS) located at <http://www.nrc.gov/NRC/ADAMS/index.html>. Appendix O contains the excerpted comments and the staff's responses. Related issues are grouped together. The staff chose not to edit comments, and instead reprinted the comments in this appendix without modification. Emphasis added by the authors of the comments, such as capitalization, was retained. Appendix P contains excerpts of the public meeting transcripts, the written statements provided at the public meetings, and comment letters.

Each comment identified by the staff from the transcripts and comment letters was assigned a specific alpha-numeric comment number. The comment number is typed in the margin of the transcript or letter at the beginning of the comment. Table O-1 contains a cross-reference of the comment numbers, the speaker or author of the comment, the page where the comment can be found in Appendix P, and the section of this Appendix where the comment is addressed.

The speakers at the meetings are listed in speaking order in Table O-1. The comments from the transcript are identified by the letters "SF," "CH," "BO," or "AT," followed by a number that identifies each comment in approximate chronological order in which the comments were made. The letters "SF" indicate that the comments were made at the meeting in San Francisco, California, the letters "CH" indicate that the comments were made at the meeting in Chicago, Illinois, the letters "BO" indicate that the comments were made at the meeting in Boston, Massachusetts, and the letters "AT" indicate the comments were made in Atlanta, Georgia. The written statements (from the public meetings) and written comment letters are identified by the letters "CL," for "comment letter."

The staff made a determination on each comment that it was one of the following:

- (1) a comment that was actually a request for information, or a statement of opinion, which did not introduce new information.
- (2) a comment that raised an environmental issue that was not addressed in the supplement, but is within the scope of the environmental review.
- (3) a comment outside the scope of this environmental review (based on the determination of scope and purpose of this Supplement, see Section 1.3, Scope of the Supplement).

Comments without a supporting technical basis or without any new information are discussed in this Appendix, and not in other sections of this Supplement. Relevant references that address the issues within the regulatory authority of the NRC are provided where appropriate. Many of these references can be obtained from the NRC Electronic Public Document Room.

Within each section of this Appendix, similar comments are grouped together for ease of

reference, and are followed by the staff's response. Where the comment or question resulted in a change in the text of the draft Supplement, the corresponding response refers the reader to the appropriate section of the final Supplement where the change was made. Revisions to the text in this final Supplement report are designated by vertical lines beside the text.

Some numbers were initially assigned to portions of verbal or written statements that were later determined not to be comments or some comments were combined. These items were removed from the table. As a result, not all numbers in Table O-1 are sequential.

Table O.1. Comment Log

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|------------------------------------|-----------|----------------------------|--|
| SF-A/1 | Sokolsky, David | Meeting Transcript - San Francisco | 12/4/2001 | P-1 | O 6.2 |
| SF-A/2 | Sokolsky, David | Meeting Transcript - San Francisco | 12/4/2001 | P-7 | O.6.2 |
| SF-B/1 | Cabasso, Jackie | Meeting Transcript - San Francisco | 12/4/2001 | P-2 | O 6.2 |
| SF-B/2 | Cabasso, Jackie | Meeting Transcript - San Francisco | 12/4/2001 | P-2 | O.6.2 |
| SF-B/4 | Cabasso, Jackie | Meeting Transcript - San Francisco | 12/4/2001 | P-11 | O 2.3 1 |
| SF-B/5 | Cabasso, Jackie | Meeting Transcript - San Francisco | 12/4/2001 | P-11 | O 4.4 |
| SF-C/1 | Nesbitt, Dale | Meeting Transcript - San Francisco | 12/4/2001 | P-4 | O 5.5 |
| SF-C/2 | Nesbitt, Dale | Meeting Transcript - San Francisco | 12/4/2001 | P-6 | O 5.5 |
| SF-C/3 | Nesbitt, Dale | Meeting Transcript - San Francisco | 12/4/2001 | P-10 | O 2.4.1 |
| SF-C/4 | Nesbitt, Dale | Meeting Transcript - San Francisco | 12/4/2001 | P-10 | O 2.4.1 |
| SF-C/5 | Nesbitt, Dale | Meeting Transcript - San Francisco | 12/4/2001 | P-10 | O 4.4 |
| SF-C/6 | Nesbitt, Dale | Meeting Transcript - San Francisco | 12/4/2001 | P-10 | O.2.4.1 |
| SF-C/7 | Nesbitt, Dale | Meeting Transcript - San Francisco | 12/4/2001 | P-11 | O.1.6 |
| SF-D/1 | Olson, Patricia | Meeting Transcript - San Francisco | 12/4/2001 | P-9 | O 5.2 |
| SF-D/2 | Olson, Patricia | Meeting Transcript - San Francisco | 12/4/2001 | P-9 | O 4.1 |
| SF-D/3 | Olson, Patricia | Meeting Transcript - San Francisco | 12/4/2001 | P-9 | O 4.1 |
| CH-A/1 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-14 | O.6.2 |
| CH-A/2 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-14 | O.6.2 |
| CH-A/3 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-16 | O 3.0 |
| CH-A/4 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-21 | O.6.4 |
| CH-A/5 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-21 | O.2.3.2 |
| CH-A/6 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-21 | O 4.10 |
| CH-A/7 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-21 | O.2.4.2 |
| CH-A/8 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-21 | O.2.4.1 |
| CH-A/9 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-22 | O 2.4.1 |
| CH-A/10 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-22 | O 1.16 |
| CH-A/11 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-22 | O 2.3.4 |
| CH-A/12 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-22 | O 2.3.1 |
| CH-A/13 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-22 | O 6.1 |
| CH-A/14 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-22 | O 2.3.1 |
| CH-A/15 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-25 | O 4.10 |
| CH-A/16 | Musiker, Debbie | Meeting Transcript - Chicago | 12/6/2001 | P-29 | O 6.2 |
| CH-B/1 | Gaynor, Paul | Meeting Transcript - Chicago | 12/6/2001 | P-15 | O.1.4 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-----------------------|-------------------|------------------------------|------------|-------------------------------------|--|
| CH-B/3 | Gaynor, Paul | Meeting Transcript - Chicago | 12/6/2001 | P-23 | O.5.1 |
| CH-B/4 | Gaynor, Paul | Meeting Transcript - Chicago | 12/6/2001 | P-23 | O.5.1 |
| CH-C/1 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-17 | O.2.3.3 |
| CH-C/2 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-18 | O.2.3.3 |
| CH-C/3 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-18 | O.5.4 |
| CH-C/4 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-18 | O.2.3.3 |
| CH-C/5 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-18 | O.2.3.3 |
| CH-C/6 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-19 | O.1.6 |
| CH-C/7 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-19 | O.2.3.3 |
| CH-C/8 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-19 | O.2.3.3 |
| CH-C/9 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-19 | O.2.3.3 |
| CH-C/10 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-19 | O.2.2 |
| CH-C/11 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-20 | O.2.3.3 |
| CH-C/12 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-20 | O.2.2 |
| CH-C/14 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-27 | O.2.3.3 |
| CH-C/15 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-28 | O.2.3 |
| CH-C/16 | Klebe, Michael | Meeting Transcript - Chicago | 12/6/2001 | P-29 | O.2.3 |
| CH-D/1 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-23 | O.6.5 |
| CH-D/2 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-23 | O.1.8 |
| CH-D/5 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-23 | O.6.1 |
| CH-D/6 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-23 | O.1.9 |
| CH-D/7 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-24 | O.1.8 |
| CH-D/8 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-24 | O.1.7 |
| CH-D/9 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-24 | O.6.5 |
| CH-D/10 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-24 | O.6.5 |
| CH-D/11 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-24 | O.1.6 |
| CH-D/12 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-24 | O.5.1 |
| CH-D/13 | Goodman, Lynne | Meeting Transcript - Chicago | 12/6/2001 | P-30 | O.5.3 |
| BO-A/1 | Dierker, Carl | Meeting Transcript - Boston | 12/10/2001 | P-30 | O.2.3.2 |
| BO-A/2 | Dierker, Carl | Meeting Transcript - Boston | 12/10/2001 | P-31 | O.2.3.2 |
| BO-A/3 | Dierker, Carl | Meeting Transcript - Boston | 12/10/2001 | P-31 | O.2.3.2 |
| BO-A/4 ^(a) | Dierker, Carl | Meeting Transcript - Boston | 12/10/2001 | P-31 | O.5.7 |
| BO-A/6 | Dierker, Carl | Meeting Transcript - Boston | 12/10/2001 | P-32 | O.5.5 |
| BO-B/1 | Williams, Carl | Meeting Transcript - Boston | 12/10/2001 | P-32 | O.5.4 |
| BO-B/2 | Williams, Carl | Meeting Transcript - Boston | 12/10/2001 | P-33 | O.5.4 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|------------------------------|------------|----------------------------|--|
| AT-A/1 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-38 | O.6.2 |
| AT-A/2 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-44 | O.5.2 |
| AT-A/3 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-44 | O.5.2 |
| AT-A/5 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-44 | O.5.2 |
| AT-A/6 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-45 | O.5.3 |
| AT-A/7 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-45 | O.5.2 |
| AT-A/8 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-45 | O.6.3 |
| AT-A/9 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-45 | O.2.2 |
| AT-A/10 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-45 | O.2.4.2 |
| AT-A/11 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-46 | O.2.4.2 |
| AT-A/12 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-46 | O.2.4.1 |
| AT-A/13 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-46 | O.5.3 |
| AT-A/14 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-46 | O.2.4.1 |
| AT-A/15 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-46 | O.4.4 |
| AT-A/16 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-46 | O.4.4 |
| AT-A/17 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-47 | O.5.9 |
| AT-A/18 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-47 | O.5.5 |
| AT-A/19 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-47 | O.5.10 |
| AT-A/20 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-47 | O.5.2 |
| AT-A/21 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-47 | O.1.16 |
| AT-A/22 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-47 | O.2.2 |
| AT-A/23 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-47 | O.5.6 |
| AT-A/24 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-48 | O.4.6 |
| AT-A/25 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-48 | O.4.4 |
| AT-A/26 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-48 | O.4.5 |
| AT-A/27 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-48 | O.1.6 |
| AT-A/29 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-48 | O.1.9 |
| AT-A/30 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-49 | O.1.10 |
| AT-A/31 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-49 | O.1.9 |
| AT-A/32 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-49 | O.5.9 |
| AT-A/33 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-49 | O.1.6 |
| AT-A/34 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-49 | O.1.16 |
| AT-A/35 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-50 | O.1.16 |
| AT-A/36 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-50 | O.1.2 |
| AT-A/37 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-50 | O.2.3.4 |
| AT-A/38 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-50 | O.4.1.1 |
| AT-A/39 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-50 | O.4.8 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|------------------------------|------------|-------------------------------------|--|
| AT-A/40 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-51 | O.1.10 |
| AT-A/41 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-51 | O.5.9 |
| AT-A/42 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-51 | O 2.3 2 |
| AT-A/43 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-51 | O 4.3 |
| AT-A/44 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-51 | O.6.5 |
| AT-A/45 | Barczak, Sara | Meeting Transcript - Atlanta | 12/12/2001 | P-51 | O.5 9 |
| AT-B/1 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-38 | O.1.6 |
| AT-B/2 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-39 | O 4.7 |
| AT-B/3 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-39 | O 4 7 |
| AT-B/4 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-40 | O 4.8 |
| AT-B/5 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-55 | O.5 8 |
| AT-B/6 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-55 | O 4 7 |
| AT-B/7 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-55 | O.5.2 |
| AT-B/8 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-55 | O.4.5 |
| AT-B/9 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-55 | O.6 5 |
| AT-B/10 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-55 | O.2.1 |
| AT-B/11 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-56 | O.2.4.1 |
| AT-B/12 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-56 | O.2 4.3 |
| AT-B/13 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-56 | O.5 2 |
| AT-B/14 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-56 | O.1.10 |
| AT-B/15 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-57 | O.4.7 |
| AT-B/16 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-57 | O 2.3 2 |
| AT-B/17 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-57 | O 2.3 3 |
| AT-B/18 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-57 | O.6.4 |
| AT-B/19 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-73 | O.5.2 |
| AT-B/20 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-73 | O.5 2 |
| AT-B/21 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-73 | O 2 2 |
| AT-B/22 | Zeller, Janet | Meeting Transcript - Atlanta | 12/12/2001 | P-73 | O.2.1 |
| AT-C/1 | Martin, Ed | Meeting Transcript - Atlanta | 12/12/2001 | P-41 | O.5.9 |
| AT-C/2 | Martin, Ed | Meeting Transcript - Atlanta | 12/12/2001 | P-41 | O.1.9 |
| AT-C/3 | Martin, Ed | Meeting Transcript - Atlanta | 12/12/2001 | P-42 | O.2.3.4 |
| AT-C/4 | Martin, Ed | Meeting Transcript - Atlanta | 12/12/2001 | P-41 | O.1 9 |
| AT-C/5 | Martin, Ed | Meeting Transcript - Atlanta | 12/12/2001 | P-41 | O.4.7 |
| AT-C/6 | Martin, Ed | Meeting Transcript - Atlanta | 12/12/2001 | P-41 | O.1.9 |
| AT-D/1 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O.1.9 |
| AT-D/2 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O.2.4 2 |
| AT-D/3 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O.5.9 |
| AT-D/4 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O 4 4 |
| AT-D/5 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O.3 0 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|----------------------|------------------------------|------------|----------------------------|--|
| AT-D/6 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O.1.15 |
| AT-D/7 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O.4.3 |
| AT-D/8 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O.6.5 |
| AT-D/9 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-52 | O.2.3.3 |
| AT-D/10 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-53 | O.6.3 |
| AT-D/11 | Kushner, Adele | Meeting Transcript - Atlanta | 12/12/2001 | P-53 | O.2.4.2 |
| AT-E/1 | Genoa, Paul | Meeting Transcript - Atlanta | 12/12/2001 | P-53 | O.2.3.4 |
| AT-E/2 | Genoa, Paul | Meeting Transcript - Atlanta | 12/12/2001 | P-72 | O.2.2 |
| AT-F/1 | Zeller, Lou | Meeting Transcript - Atlanta | 12/12/2002 | P-58 | O.2.2 |
| AT-F/2 | Zeller, Lou | Meeting Transcript - Atlanta | 12/12/2002 | P-58 | O.2.4.1 |
| AT-F/3 | Zeller, Lou | Meeting Transcript - Atlanta | 12/12/2002 | P-58 | O.4.4 |
| AT-F/4 | Zeller, Lou | Meeting Transcript - Atlanta | 12/12/2002 | P-58 | O.2.4.1 |
| AT-F/5 | Zeller, Lou | Meeting Transcript - Atlanta | 12/12/2002 | P-58 | O.2.2 |
| AT-F/6 | Zeller, Lou | Meeting Transcript - Atlanta | 12/12/2002 | P-59 | O.1.6 |
| AT-F/7 | Zeller, Lou | Meeting Transcript - Atlanta | 12/12/2002 | P-60 | O.1.15 |
| AT-G/1 | Carroll, Glen | Meeting Transcript - Atlanta | 12/12/2001 | P-60 | O.2.3.3 |
| AT-G/2 | Carroll, Glen | Meeting Transcript - Atlanta | 12/12/2001 | P-61 | O.4.3 |
| AT-G/3 | Carroll, Glen | Meeting Transcript - Atlanta | 12/12/2001 | P-61 | O.4.1 |
| AT-G/4 | Carroll, Glen | Meeting Transcript - Atlanta | 12/12/2001 | P-61 | O.3.0 |
| AT-G/5 | Carroll, Glen | Meeting Transcript - Atlanta | 12/12/2001 | P-61 | O.2.3.3 |
| AT-G/7 | Carroll, Glen | Meeting Transcript - Atlanta | 12/12/2001 | P-71 | O.1.9 |
| AT-H/1 | Ferguson, Tom | Meeting Transcript - Atlanta | 12/12/2001 | P-62 | O.5.2 |
| CL-01/1 | Scherer, A Edward | Letter | 12/27/2001 | P-75 | O.6.5 |
| CL-01/2 | Scherer, A Edward | Letter | 12/27/2001 | P-75 | O.5.6 |
| CL-01/3 | Scherer, A Edward | Letter | 12/27/2001 | P-75 | O.6.1 |
| CL-01/4 | Scherer, A Edward | Letter | 12/27/2001 | P-75 | O.1.2 |
| CL-01/5 | Scherer, A Edward | Letter | 12/27/2001 | P-75 | O.6.1 |
| CL-01/6 | Scherer, A Edward | Letter | 12/27/2001 | P-76 | O.1.11 |
| CL-01/7 | Scherer, A Edward | Letter | 12/27/2001 | P-76 | O.1.13 |
| CL-01/8 | Scherer, A Edward | Letter | 12/27/2001 | P-76 | O.4.1.1 |
| CL-02/1 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-79 | O.1.9 |
| CL-02/2 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-79 | O.4.10 |
| CL-02/3 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.1.9 |
| CL-02/4 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.6.5 |
| CL-02/5 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.4.4 |
| CL-02/6 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.4.3 |
| CL-02/7 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.1.9 |
| CL-02/8 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.6.5 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|----------------------|--------|------------|-------------------------------------|--|
| CL-02/9 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O 4.9 |
| CL-02/10 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O 2.2 |
| CL-02/11 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.2.2 |
| CL-02/12 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.4.10 |
| CL-02/13 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.4.4 |
| CL-02/14 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.6.5 |
| CL-02/15 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O 2.2 |
| CL-02/16 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-80 | O.6.5 |
| CL-02/17 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-81 | O.1.9 |
| CL-02/18 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-84 | O 2.1 |
| CL-02/19 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-84 | O.1.9 |
| CL-02/20 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-86 | O.1.9 |
| CL-02/21 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-86 | O 4.4 |
| CL-02/22 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-87 | O.1.9 |
| CL-02/23 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-87 | O 4.4 |
| CL-02/24 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-87 | O 4.4 |
| CL-02/25 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-88 | O 4.4 |
| CL-02/26 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-88 | O 4.4 |
| CL-02/27 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-88 | O.1.9 |
| CL-02/28 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-89 | O.1.9 |
| CL-02/29 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-89 | O 4.3 |
| CL-02/30 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-90 | O 4.3 |
| CL-02/31 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-90 | O.4.10 |
| CL-02/32 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-92 | O 4.9 |
| CL-02/33 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-92 | O.4.10 |
| CL-02/34 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-92 | O.1.10 |
| CL-02/35 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-93 | O 4.9 |
| CL-02/36 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-94 | O.1.9 |
| CL-02/37 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-95 | O 2.2 |
| CL-02/38 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-95 | O 2.2 |
| CL-02/39 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-95 | O 4.10 |
| CL-02/40 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-95 | O.6.1 |
| CL-02/41 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-96 | O 4.10 |
| CL-02/42 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-96 | O.4.10 |
| CL-02/43 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-96 | O.5.8 |
| CL-02/44 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-97 | O.5.5 |
| CL-02/45 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-97 | O.1.4 |
| CL-02/46 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-98 | O.1.13 |
| CL-02/47 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-98 | O 1.1 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|------------------------|--------|------------|-------------------------------------|--|
| CL-02/48 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-98 | O.1.2 |
| CL-02/49 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-99 | O.1.2 |
| CL-02/50 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-99 | O.1.3 |
| CL-02/51 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-100 | O.1.4 |
| CL-02/52 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-101 | O.1.16 |
| CL-02/53 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-101 | O.1.4 |
| CL-02/54 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-101 | O.1.8 |
| CL-02/55 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-101 | O.1.10 |
| CL-02/56 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-102 | O.1.16 |
| CL-02/57 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-102 | O.1.9 |
| CL-02/58 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-102 | O.1.10 |
| CL-02/59 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-103 | O.1.10 |
| CL-02/60 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-103 | O.1.11 |
| CL-02/61 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-103 | O.1.12 |
| CL-02/62 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-103 | O.1.12 |
| CL-02/63 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-103 | O.1.16 |
| CL-02/64 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-104 | O.1.13 |
| CL-02/65 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-104 | O.1.15 |
| CL-02/66 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-104 | O.1.9 |
| CL-02/67 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-105 | O.5.7 |
| CL-02/68 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-105 | O.1.10 |
| CL-02/69 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-105 | O.1.10 |
| CL-02/70 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-105 | O.1.11 |
| CL-02/71 | Epstein, Eric Joseph | Letter | 12/28/2001 | P-106 | O.1.15 |
| CL-03/1 | Scott, Collier Shannon | Letter | 12/31/2001 | P-108 | O.4.1.1 |
| CL-03/2 | Scott, Collier Shannon | Letter | 12/31/2001 | P-108 | O.4.1.1 |
| CL-03/3 | Scott, Collier Shannon | Letter | 12/31/2001 | P-108 | O.4.1.1 |
| CL-03/4 | Scott, Collier Shannon | Letter | 12/31/2001 | P-108 | O.4.1.1 |
| CL-03/5 | Scott, Collier Shannon | Letter | 12/31/2001 | P-109 | O.1.10 |
| CL-03/6 | Scott, Collier Shannon | Letter | 12/31/2001 | P-109 | O.4.1.1 |
| CL-03/7 | Scott, Collier Shannon | Letter | 12/31/2001 | P-109 | O.1.10 |
| CL-03/8 | Scott, Collier Shannon | Letter | 12/31/2001 | P-109 | O.4.1.1 |
| CL-03/9 | Scott, Collier Shannon | Letter | 12/31/2001 | P-110 | O.4.1.1 |
| CL-04/1 | Williamson, Thomas | Letter | 12/27/2001 | P-111 | O.6.5 |
| CL-04/2 | Williamson, Thomas | Letter | 12/27/2001 | P-111 | O.5.4 |
| CL-04/3 | Williamson, Thomas | Letter | 12/27/2001 | P-111 | O.1.3 |
| CL-04/4 | Williamson, Thomas | Letter | 12/27/2001 | P-111 | O.1.4 |
| CL-04/5 | Williamson, Thomas | Letter | 12/27/2001 | P-111 | O.1.4 |
| CL-04/6 | Williamson, Thomas | Letter | 12/27/2001 | P-112 | O.1.5 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|----------------------|--------------------|--------|------------|-------------------------------------|--|
| CL-04/7 | Williamson, Thomas | Letter | 12/27/2001 | P-112 | O.1.6 |
| CL-04/8 | Williamson, Thomas | Letter | 12/27/2001 | P-112 | O.1.11 |
| CL-04/9 | Williamson, Thomas | Letter | 12/27/2001 | P-112 | O.1.12 |
| CL-04/10 | Williamson, Thomas | Letter | 12/27/2001 | P-112 | O.1.15 |
| CL-04/11 | Williamson, Thomas | Letter | 12/27/2001 | P-112 | O 6.1 |
| CL-04/12 | Williamson, Thomas | Letter | 12/27/2001 | P-112 | O.1.6 |
| CL-04/13 | Williamson, Thomas | Letter | 12/27/2001 | P-112 | O.1.6 |
| CL-04/14 | Williamson, Thomas | Letter | 12/27/2001 | P-113 | O.1.10 |
| CL-04/15 | Williamson, Thomas | Letter | 12/27/2001 | P-113 | O.1.15 |
| CL-04/16 | Williamson, Thomas | Letter | 12/27/2001 | P-113 | O.1.6 |
| CL-04/17 | Williamson, Thomas | Letter | 12/27/2001 | P-113 | O 6.1 |
| CL-04/18 | Williamson, Thomas | Letter | 12/27/2001 | P-113 | O.1.4 |
| CL-04/19 | Williamson, Thomas | Letter | 12/27/2001 | P-113 | O 6.1 |
| CL-05/1 | Davis, James | Letter | 12/28/2001 | P-114 | O 6.5 |
| CL-05/2 | Davis, James | Letter | 12/28/2001 | P-115 | O.1.6 |
| CL-05/3 | Davis, James | Letter | 12/28/2001 | P-115 | O 5.5 |
| CL-05/4 | Davis, James | Letter | 12/28/2001 | P-115 | O 6.1 |
| CL-05/5 | Davis, James | Letter | 12/28/2001 | P-115 | O 6.1 |
| CL-05/6 | Davis, James | Letter | 12/28/2001 | P-115 | O 6.1 |
| CL-05/7 | Davis, James | Letter | 12/28/2001 | P-115 | O 6.1 |
| CL-05/8 | Davis, James | Letter | 12/28/2001 | P-115 | O.1.6 |
| CL-05/9 | Davis, James | Letter | 12/28/2001 | P-115 | O 6.1 |
| CL-05/10 | Davis, James | Letter | 12/28/2001 | P-116 | O 2.3.3 |
| CL-05/11 | Davis, James | Letter | 12/28/2001 | P-116 | O.1.3 |
| CL-05/12 | Davis, James | Letter | 12/28/2001 | P-116 | O 6.1 |
| CL-05/13 | Davis, James | Letter | 12/28/2001 | P-116 | O.1.15 |
| CL-05/14 | Davis, James | Letter | 12/28/2001 | P-116 | O.1.4 |
| CL-05/15 | Davis, James | Letter | 12/28/2001 | P-116 | O.1.4 |
| CL-05/16 | Davis, James | Letter | 12/28/2001 | P-116 | O 6.1 |
| CL-05/17 | Davis, James | Letter | 12/28/2001 | P-116 | O.1.11 |
| CL-05/18 | Davis, James | Letter | 12/28/2001 | P-116 | O 6.1 |
| CL-05/19 | Davis, James | Letter | 12/28/2001 | P-116 | O.1.15 |
| CL-06/1 | Routh, Stephen | Letter | 12/21/2001 | P-117 | O.1.6 |
| CL-06/2 | Routh, Stephen | Letter | 12/21/2001 | P-117 | O 5.4 |
| CL-06/3 | Routh, Stephen | Letter | 12/21/2001 | P-117 | O 1.7 |
| CL-07 ^(a) | Sokolsky, David | Letter | 12/21/2001 | | |
| CL-08/1 | Barczak, Sara | Letter | 12/27/2001 | P-119 | O 5.2 |
| CL-08/2 | Barczak, Sara | Letter | 12/27/2001 | P-119 | O 5.2 |
| CL-08/3 | Barczak, Sara | Letter | 12/27/2001 | P-119 | O 2.4.1 |

(a) CL-07 Letter submitted by Mr. David Sokolsky—superceded by CL-15 dated 12/21/2001—duplicate comments.

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------------------|-------------------|--------|------------|----------------------------|--|
| CL-08/4 | Barczak, Sara | Letter | 12/27/2001 | P-119 | O.5.9 |
| CL-08/5 | Barczak, Sara | Letter | 12/27/2001 | P-119 | O.5.5 |
| CL-08/6 | Barczak, Sara | Letter | 12/27/2001 | P-119 | O.5.6 |
| CL-08/7 | Barczak, Sara | Letter | 12/27/2001 | P-119 | O.4.4 |
| CL-08/8 | Barczak, Sara | Letter | 12/27/2001 | P-119 | O.4.5 |
| CL-08/9 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.2.1 |
| CL-08/10 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.4.10 |
| CL-08/11 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.1.9 |
| CL-08/12 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.4.10 |
| CL-08/13 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.4.10 |
| CL-08/14 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.1.9 |
| CL-08/15 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.1.10 |
| CL-08/16 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.4.10 |
| CL-08/17 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.5.9 |
| CL-08/18 | Barczak, Sara | Letter | 12/27/2001 | P-120 | O.1.16 |
| CL-08/19 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.1.2 |
| CL-08/20 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.2.3.4 |
| CL-08/21 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.1.15 |
| CL-08/22 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.2.3.4 |
| CL-08/23 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.4.1.1 |
| CL-08/24 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.4.8 |
| CL-08/25 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.1.6 |
| CL-08/26 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.1.16 |
| CL-08/27 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.4.4 |
| CL-08/28 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.4.9 |
| CL-08/29 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.4.10 |
| CL-08/30 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.2.2 |
| CL-08/31 | Barczak, Sara | Letter | 12/27/2001 | P-121 | O.4.8 |
| CL-08/32 | Barczak, Sara | Letter | 12/27/2001 | P-122 | O.6.3 |
| CL-08/33 | Barczak, Sara | Letter | 12/27/2001 | P-122 | O.1.6 |
| CL-08/35 | Barczak, Sara | Letter | 12/27/2001 | P-122 | O.5.9 |
| CL-08/36 ^(a) | Barczak, Sara | Letter | 12/27/2001 | P-122 | |
| CL-09/1 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-123 | O.6.5 |
| CL-09/2 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/3 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/4 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |

(a) CL-08/36 is a comment submitted by Ms. Sara Barczak in a written statement that was read into the transcript at the Atlanta public meeting. The written statement was submitted to the NRC on December 27, 2001 along with comment letter CL-08. All the comments were duplicates of those in the transcript, except for comment CL-08/36, which has been added for completeness.

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|--------|------------|----------------------------|--|
| CL-09/5 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/6 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/7 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/8 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/9 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/10 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/11 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-124 | O.6.1 |
| CL-09/12 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/13 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/14 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/15 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/16 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/17 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.2 |
| CL-09/18 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/19 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.3 |
| CL-09/20 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.3 |
| CL-09/21 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.3 |
| CL-09/22 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.3 |
| CL-09/23 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.7 |
| CL-09/24 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.7 |
| CL-09/25 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.8 |
| CL-09/26 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.1.8 |
| CL-09/27 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/28 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/29 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/30 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/31 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-125 | O.6.1 |
| CL-09/32 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.6.1 |
| CL-09/33 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.1.8 |
| CL-09/34 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.6.1 |
| CL-09/35 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.6.1 |
| CL-09/36 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.6.1 |
| CL-09/37 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.1.6 |
| CL-09/38 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.1.6 |
| CL-09/39 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.1.6 |
| CL-09/40 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-126 | O.1.6 |
| CL-09/41 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.6 |
| CL-09/42 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.6 |
| CL-09/43 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.6.1 |
| CL-09/44 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.6 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|--------|------------|----------------------------|--|
| CL-09/45 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.6 |
| CL-09/46 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.6 |
| CL-09/47 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.6 |
| CL-09/48 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.8 |
| CL-09/49 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O 6.1 |
| CL-09/50 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O 6.1 |
| CL-09/51 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.7 |
| CL-09/52 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.7 |
| CL-09/53 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.7 |
| CL-09/54 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.7 |
| CL-09/55 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.1.7 |
| CL-09/56 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-127 | O.6.1 |
| CL-09/57 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-128 | O.6.1 |
| CL-09/58 | O'Connor, Jr, WT | Letter | 12/28/2001 | P-128 | O.6.5 |
| CL-10/1 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.2.3.2 |
| CL-10/2 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.2.2 |
| CL-10/3 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O 3.0 |
| CL-10/4 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.1.15 |
| CL-10/5 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.1.7 |
| CL-10/6 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.5.9 |
| CL-10/7 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.2.3.2 |
| CL-10/8 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.2.3.3 |
| CL-10/9 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.2.3.2 |
| CL-10/10 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.2.3.2 |
| CL-10/11 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.1.6 |
| CL-10/12 | Kushner, Adele | Letter | 12/29/2001 | P-129 | O.5.2 |
| CL-11/1 | Musiker, Debbie | Letter | 12/31/2001 | P-130 | O.6.4 |
| CL-11/2 | Musiker, Debbie | Letter | 12/31/2001 | P-130 | O.1.16 |
| CL-11/3 | Musiker, Debbie | Letter | 12/31/2001 | P-130 | O.1.6 |
| CL-11/4 | Musiker, Debbie | Letter | 12/31/2001 | P-130 | O.1.4 |
| CL-11/5 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.1.4 |
| CL-11/6 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.3.0 |
| CL-11/7 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.1.16 |
| CL-11/8 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.1.4 |
| CL-11/9 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.2.3.1 |
| CL-11/10 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.4.10 |
| CL-11/11 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.1.6 |
| CL-11/12 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O 2.4.1 |
| CL-11/13 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.2.4.1 |
| CL-11/14 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O 2.2 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|---------------------|--------|------------|----------------------------|--|
| CL-11/15 | Musiker, Debbie | Letter | 12/31/2001 | P-131 | O.2.2 |
| CL-12/1 | Martin, Ed | Letter | 12/31/2001 | P-133 | O.5.2 |
| CL-12/2 | Martin, Ed | Letter | 12/31/2001 | P-133 | O.5.2 |
| CL-12/3 | Martin, Ed | Letter | 12/31/2001 | P-133 | O.5.2 |
| CL-13/1 | Shadis, Raymond | Letter | 12/31/2001 | P-134 | O.2.4.3 |
| CL-13/2 | Shadis, Raymond | Letter | 12/31/2001 | P-134 | O.1.6 |
| CL-13/3 | Shadis, Raymond | Letter | 12/31/2001 | P-134 | O.1.7 |
| CL-13/4 | Shadis, Raymond | Letter | 12/31/2001 | P-134 | O.1.7 |
| CL-13/5 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.10 |
| CL-13/6 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.10 |
| CL-13/7 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.9 |
| CL-13/8 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.10 |
| CL-13/9 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.10 |
| CL-13/10 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.10 |
| CL-13/11 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.10 |
| CL-13/12 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.10 |
| CL-13/13 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.10 |
| CL-13/14 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.6 |
| CL-13/15 | Shadis, Raymond | Letter | 12/31/2001 | P-135 | O.1.9 |
| CL-13/16 | Shadis, Raymond | Letter | 12/31/2001 | P-136 | O.1.14 |
| CL-13/17 | Shadis, Raymond | Letter | 12/31/2001 | P-136 | O.1.15 |
| CL-13/18 | Shadis, Raymond | Letter | 12/31/2001 | P-136 | O.4.4 |
| CL-13/19 | Shadis, Raymond | Letter | 12/31/2001 | P-136 | O.4.3 |
| CL-14/1 | Oncavage, Mark P. | Letter | 12/31/2001 | P-137 | O.1.16 |
| CL-14/2 | Oncavage, Mark P. | Letter | 12/31/2001 | P-137 | O.1.16 |
| CL-14/3 | Oncavage, Mark P. | Letter | 12/31/2001 | P-138 | O.1.16 |
| CL-14/4 | Oncavage, Mark P. | Letter | 12/31/2001 | P-138 | O.2..3.4 |
| CL-14/5 | Oncavage, Mark P. | Letter | 12/31/2001 | P-138 | O.1.9 |
| CL-14/6 | Oncavage, Mark P. | Letter | 12/31/2001 | P-138 | O.2.4.1 |
| CL-14/7 | Oncavage, Mark P. | Letter | 12/31/2001 | P-138 | O.5.2 |
| CL-15/1 | Sokolsky, David | Letter | 1/2/2002 | P-140 | O.6.2 |
| CL-15/2 | Sokolsky, David | Letter | 1/2/2002 | P-140 | O.6.1 |
| CL-15/3 | Sokolsky, David | Letter | 1/2/2002 | P-140 | O.6.1 |
| CL-15/4 | Sokolsky, David | Letter | 1/2/2002 | P-140 | O.6.1 |
| CL-15/6 | Sokolsky, David | Letter | 1/2/2002 | P-140 | O.1.6 |
| CL-16/1 | Miller, Anne Norton | Letter | 12/21/2001 | P-141 | O.6.5 |
| CL-16/2 | Miller, Anne Norton | Letter | 12/21/2001 | P-141 | O.6.1 |
| CL-16/3 | Miller, Anne Norton | Letter | 12/21/2001 | P-141 | O.5.5 |
| CL-16/4 | Miller, Anne Norton | Letter | 12/21/2001 | P-141 | O.6.1 |

Table O.1.1 (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|---------------------|--------|------------|----------------------------|--|
| CL-16/5 | Miller, Anne Norton | Letter | 12/21/2001 | P-141 | O.1.2 |
| CL-16/6 | Miller, Anne Norton | Letter | 12/21/2001 | P-142 | O.6.1 |
| CL-16/7 | Miller, Anne Norton | Letter | 12/21/2001 | P-142 | O.4.6 |
| CL-16/8 | Miller, Anne Norton | Letter | 12/21/2001 | P-142 | O.6.1 |
| CL-16/9 | Miller, Anne Norton | Letter | 12/21/2001 | P-142 | O.2.4.1 |
| CL-16/10 | Miller, Anne Norton | Letter | 12/21/2001 | P-142 | O.2.3.3 |
| CL-16/11 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.5.6 |
| CL-16/12 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.5.4 |
| CL-16/13 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.1.2 |
| CL-16/14 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.1.7 |
| CL-16/15 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.5.5 |
| CL-16/16 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.6.1 |
| CL-16/17 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.3.0 |
| CL-16/18 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.1.6 |
| CL-16/19 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.1.2 |
| CL-16/20 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.1.6 |
| CL-16/21 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.6.1 |
| CL-16/22 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.6.1 |
| CL-16/23 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.1.1 |
| CL-16/24 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.1.1 |
| CL-16/25 | Miller, Anne Norton | Letter | 12/21/2001 | P-143 | O.1.1 |
| CL-16/26 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.1 |
| CL-16/27 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.1 |
| CL-16/28 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/29 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/30 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/31 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/32 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/33 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/34 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/35 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/36 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/37 | Miller, Anne Norton | Letter | 12/21/2001 | P-144 | O.1.2 |
| CL-16/38 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.2 |
| CL-16/39 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.3 |
| CL-16/40 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.3 |
| CL-16/41 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.3 |
| CL-16/42 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.3 |
| CL-16/43 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.3 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|---------------------|--------|------------|----------------------------|--|
| CL-16/44 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.3 |
| CL-16/45 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.4 |
| CL-16/46 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.4 |
| CL-16/47 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.4 |
| CL-16/48 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.4 |
| CL-16/49 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.4 |
| CL-16/50 | Miller, Anne Norton | Letter | 12/21/2001 | P-145 | O.1.4 |
| CL-16/51 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/52 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/53 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/54 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/55 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/56 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/57 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/58 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/59 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/60 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.4 |
| CL-16/61 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.5 |
| CL-16/62 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.5 |
| CL-16/63 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.6 |
| CL-16/64 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.6 |
| CL-16/65 | Miller, Anne Norton | Letter | 12/21/2001 | P-146 | O.1.6 |
| CL-16/66 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.1.6 |
| CL-16/67 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.2.3.4 |
| CL-16/68 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.6.1 |
| CL-16/69 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.1.12 |
| CL-16/70 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.1.15 |
| CL-16/71 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.6.1 |
| CL-16/72 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.6.1 |
| CL-16/73 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.6.1 |
| CL-16/74 | Miller, Anne Norton | Letter | 12/21/2001 | P-147 | O.6.1 |
| CL-17/1 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-148 | O.2.3.3 |
| CL-17/2 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O.5.4 |
| CL-17/3 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O.4.8 |
| CL-17/4 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O.2.3.3 |
| CL-17/5 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O.2.2 |
| CL-17/6 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O.4.8 |
| CL-17/7 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O.2.3.3 |
| CL-17/8 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O.2.2 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------------|--------|------------|----------------------------|--|
| CL-17/9 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O 4.3 |
| CL-17/10 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O 6.5 |
| CL-17/11 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O 6.5 |
| CL-17/12 | Ortciger, Thomas W. | Letter | 1/7/2002 | P-149 | O 2.2 |
| CL-18/1 | Delezenski, Jerry | Letter | 11/20/2001 | P-150 | O 6.1 |
| CL-18/2 | Delezenski, Jerry | Letter | 11/20/2001 | P-150 | O 1.9 |
| CL-18/3 | Delezenski, Jerry | Letter | 11/20/2001 | P-150 | O 6.5 |
| CL-19/1 | Byrne, Stephen A. | Letter | 12/20/2001 | P-151 | O 2.3 3 |
| CL-19/2 | Byrne, Stephen A. | Letter | 12/20/2001 | P-151 | O 2.3.3 |
| CL-20/1 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-152 | O 6.5 |
| CL-20/2 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-152 | O 6.3 |
| CL-20/3 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-152 | O 6.5 |
| CL-20/4 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-152 | O 2.2 |
| CL-20/5 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-152 | O 1.1.6 |
| CL-20/6 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-152 | O 5.5 |
| CL-20/7 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-153 | O 1.6 |
| CL-20/8 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-153 | O 1.6 |
| CL-20/9 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-153 | O 1.4 |
| CL-20/10 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-153 | O 1.4 |
| CL-20/11 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-154 | O 6.5 |
| CL-20/12 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-154 | O 4.7 |
| CL-20/13 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-154 | O 4.8 |
| CL-20/14 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-154 | O 3.0 |
| CL-20/15 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-154 | O 1.2 |
| CL-20/17 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-154 | O 4.6 |
| CL-20/18 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-154 | O 1.2 |
| CL-20/19 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-154 | O 1.2 |
| CL-20/20 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 2.3 4 |
| CL-20/21 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 4.3 |
| CL-20/22 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 3.0 |
| CL-20/23 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 3.0 |
| CL-20/24 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 1.8 |
| CL-20/25 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 4.4 |
| CL-20/26 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 4.4 |
| CL-20/27 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 4.4 |
| CL-20/28 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 1.2 |
| CL-20/29 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 1.2 |
| CL-20/30 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O 1.1.6 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------------|--------|------------|-------------------------------------|--|
| CL-20/31 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O.1.3 |
| CL-20/32 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O.3.0 |
| CL-20/33 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-155 | O.1.6 |
| CL-20/34 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.1.6 |
| CL-20/35 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.4.3 |
| CL-20/36 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.1.4 |
| CL-20/37 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.1.6 |
| CL-20/38 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.1.4 |
| CL-20/40 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.1.4 |
| CL-20/41 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.4.9 |
| CL-20/42 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.4.8 |
| CL-20/43 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.5.4 |
| CL-20/44 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-156 | O.2.2 |
| CL-20/45 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.2.2 |
| CL-20/47 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.9 |
| CL-20/48 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.9 |
| CL-20/49 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.9 |
| CL-20/50 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.10 |
| CL-20/51 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.10 |
| CL-20/52 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.6 |
| CL-20/53 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.2.2 |
| CL-20/54 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.6 |
| CL-20/55 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.6 |
| CL-20/56 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-157 | O.1.6 |
| CL-20/57 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.3.0 |
| CL-20/58 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.3.0 |
| CL-20/59 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.3.0 |
| CL-20/60 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.3.0 |
| CL-20/61 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.2.3.2 |
| CL-20/62 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.2.3.2 |
| CL-20/63 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.2.3.2 |
| CL-20/64 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.6.5 |
| CL-20/65 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.2.2 |
| CL-20/66 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.2.2 |
| CL-20/67 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.2.2 |
| CL-20/68 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.1.2 |
| CL-20/69 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.3.0 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page In Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------------|--------|------------|----------------------------|--|
| CL-20/70 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.1.6 |
| CL-20/71 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.4.3 |
| CL-20/72 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.3.0 |
| CL-20/73 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-158 | O.4.2 |
| CL-20/74 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.2.4.1 |
| CL-20/75 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.3.0 |
| CL-20/76 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.1.2 |
| CL-20/77 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.4.3 |
| CL-20/78 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.4.3 |
| CL-20/79 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.2.4.1 |
| CL-20/80 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.2.4.1 |
| CL-20/81 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.4.4 |
| CL-20/82 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.6.5 |
| CL-20/83 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.5.4 |
| CL-20/84 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-159 | O.4.4 |
| CL-20/85 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.15 |
| CL-20/86 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.15 |
| CL-20/87 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.5.4 |
| CL-20/88 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.4.8 |
| CL-20/89 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/90 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/91 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/92 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/93 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/94 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/95 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.2.2 |
| CL-20/96 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/97 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/98 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/99 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.6 |
| CL-20/100 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-160 | O.1.7 |
| CL-20/101 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.1.7 |
| CL-20/102 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.1.7 |
| CL-20/103 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.1.6 |
| CL-20/104 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.1.6 |
| CL-20/105 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.1.6 |
| CL-20/106 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.1.6 |
| CL-20/107 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.2.2 |
| CL-20/108 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.6.5 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------------|--------|------------|----------------------------|--|
| CL-20/109 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.4.1.1 |
| CL-20/110 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O 4.1.1 |
| CL-20/111 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O 4.1.1 |
| CL-20/112 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.4.1.1 |
| CL-20/113 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.5.2 |
| CL-20/114 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-161 | O.4.3 |
| CL-20/115 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-162 | O 6 3 |
| CL-20/116 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-162 | O 4.5 |
| CL-20/117 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-162 | O 6.5 |
| CL-20/118 | Blockey-O'Brien, Pamela | Letter | 12/26/2001 | P-162 | O 6.5 |
| CL-21/1 | Guynup, Sharon | Letter | 1/19/2002 | P-163 | O 2.2 |
| CL-22/1 | sublimation@webtv.net | Letter | 1/19/2002 | P-164 | O.6.5 |
| CL-23/1 | Long, A. J. (Fred) | Letter | 1/20/2002 | P-165 | O.4.1.1 |
| CL-24/1 | Gniffiths, Rachel | Letter | 1/20/2002 | P-166 | O 2.2 |
| CL-24/2 | Gniffiths, Rachel | Letter | 1/20/2002 | P-166 | O.5.9 |
| CL-24/3 | Gniffiths, Rachel | Letter | 1/20/2002 | P-166 | O.1.16 |
| CL-24/4 | Gniffiths, Rachel | Letter | 1/20/2002 | P-166 | O 2.3.4 |
| CL-24/5 | Gniffiths, Rachel | Letter | 1/20/2002 | P-166 | O.4.1.1 |
| CL-24/6 | Gniffiths, Rachel | Letter | 1/20/2002 | P-166 | O.2 2 |
| CL-25/1 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.2 2 |
| CL-25/2 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.1.16 |
| CL-25/3 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.4.9 |
| CL-25/4 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.4.4 |
| CL-25/5 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.5.9 |
| CL-25/6 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.1.16 |
| CL-25/7 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.4.8 |
| CL-25/8 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.1 6 |
| CL-25/9 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.5 8 |
| CL-25/10 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.2.2 |
| CL-25/11 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.4.1.1 |
| CL-25/12 | Russell, Edward T. | Letter | 1/20/2002 | P-167 | O.6 5 |
| CL-26/1 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.1.16 |
| CL-26/2 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.2.3.4 |
| CL-26/3 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.4 2 |
| CL-26/4 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.2.3.3 |
| CL-26/5 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.4 8 |
| CL-26/6 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.4.7 |
| CL-26/7 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.1 6 |
| CL-26/8 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O 1 6 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-----------------------|--------|------------|----------------------------|--|
| CL-26/9 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.1.6 |
| CL-26/10 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.5.8 |
| CL-26/11 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.5.2 |
| CL-26/12 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.5.5 |
| CL-26/13 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.2.2 |
| CL-26/14 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.5.2 |
| CL-26/15 | Matthews, Dave | Letter | 1/21/2002 | P-168 | O.4.1.1 |
| CL-27/1 | Schumann, Klaus | Letter | 1/21/2002 | P-169 | O.5.9 |
| CL-27/2 | Schumann, Klaus | Letter | 1/21/2002 | P-169 | O.5.2 |
| CL-27/3 | Schumann, Klaus | Letter | 1/21/2002 | P-169 | O.2.4 |
| CL-28/1 | Larson, Dennis | Letter | 1/21/2002 | P-170 | O.5.10 |
| CL-29/1 | Kellerman, Martin | Letter | 1/21/2002 | P-171 | O.4.8 |
| CL-29/2 | Kellerman, Martin | Letter | 1/21/2002 | P-171 | O.2.3.4 |
| CL-29/3 | Kellerman, Martin | Letter | 1/21/2002 | P-171 | O.4.1.1 |
| CL-30/1 | Heider, Kenneth J. | Letter | 12/26/2001 | P-172 | O.6.5 |
| CL-30/2 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/3 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/4 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.2.3.4 |
| CL-30/5 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/6 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/7 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/8 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/9 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/10 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/11 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/12 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-30/13 | Heider, Kenneth J. | Letter | 12/26/2001 | P-173 | O.6.1 |
| CL-31/1 | Gallagher, Michael P. | Letter | 12/28/2001 | P-174 | O.6.5 |
| CL-31/2 | Gallagher, Michael P. | Letter | 12/28/2001 | P-174 | O.6.5 |
| CL-31/3 | Gallagher, Michael P. | Letter | 12/28/2001 | P-174 | O.2.3.3 |
| CL-31/4 | Gallagher, Michael P. | Letter | 12/28/2001 | P-174 | O.2.3.4 |
| CL-31/5 | Gallagher, Michael P. | Letter | 12/28/2001 | P-174 | O.2.3.2 |
| CL-31/6 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.6.1 |
| CL-31/7 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.1.9 |
| CL-31/8 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.1.2 |
| CL-31/9 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.1.3 |
| CL-31/10 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.1.6 |
| CL-31/11 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.1.6 |
| CL-31/12 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.1.9 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-----------------------|--------|------------|----------------------------|--|
| CL-31/13 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.1.9 |
| CL-31/14 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.6.1 |
| CL-31/15 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.1.7 |
| CL-31/16 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O 6.1 |
| CL-31/17 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O 6.1 |
| CL-31/18 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O 2.3 3 |
| CL-31/19 | Gallagher, Michael P. | Letter | 12/28/2001 | P-175 | O.6.1 |
| CL-32/1 | Clark, Susan | Letter | 1/24/2002 | P-176 | O 2.2 |
| CL-32/2 | Clark, Susan | Letter | 1/24/2002 | P-176 | O.2.3 3 |
| CL-32/3 | Clark, Susan | Letter | 1/24/2002 | P-176 | O.1.6 |
| CL-33/1 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O 2.2 |
| CL-33/2 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O 6.3 |
| CL-33/3 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.1.6 |
| CL-33/4 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.1.6 |
| CL-33/5 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O 2.2 |
| CL-33/6 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O 2.2 |
| CL-33/7 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O 2.3 4 |
| CL-33/8 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O 4.2 |
| CL-33/9 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.4.8 |
| CL-33/10 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.1.6 |
| CL-33/11 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.1.6 |
| CL-33/12 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.1.6 |
| CL-33/13 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.5 8 |
| CL-33/14 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.1.16 |
| CL-33/15 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.5.2 |
| CL-33/16 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.5.5 |
| CL-33/17 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.2.2 |
| CL-33/18 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.5 2 |
| CL-33/19 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.5.4 |
| CL-33/20 | Nagel, Margaret | Letter | 1/24/2002 | P-177 | O.4.7 |
| CL-34/1 | Casten, Liane | Letter | 1/24/2002 | P-178 | O.6.5 |
| CL-34/2 | Casten, Liane | Letter | 1/24/2002 | P-178 | O.1 6 |
| CL-34/3 | Casten, Liane | Letter | 1/24/2002 | P-178 | O.6 3 |
| CL-34/4 | Casten, Liane | Letter | 1/24/2002 | P-178 | O.4.8 |
| CL-34/5 | Casten, Liane | Letter | 1/24/2002 | P-178 | O.6.5 |
| CL-35/1 | Kim, Mary | Letter | 1/25/2002 | P-179 | O.5.2 |
| CL-36/1 | Miller, Suzanne | Letter | 1/25/2002 | P-180 | O.5 2 |
| CL-36/2 | Miller, Suzanne | Letter | 1/25/2002 | P-180 | O.2 2 |
| CL-36/3 | Miller, Suzanne | Letter | 1/25/2002 | P-180 | O 5.9 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page In Appendix P | Section of Appendix O where comment is addressed |
|-------------|--------------------|--------|-----------|-------------------------------------|--|
| CL-36/4 | Miller, Suzanne | Letter | 1/25/2002 | P-180 | O.2.2 |
| CL-36/5 | Miller, Suzanne | Letter | 1/25/2002 | P-180 | O.4.8 |
| CL-36/6 | Miller, Suzanne | Letter | 1/25/2002 | P-180 | O.2.4.2 |
| CL-36/7 | Miller, Suzanne | Letter | 1/25/2002 | P-180 | O.4.1.1 |
| CL-36/8 | Miller, Suzanne | Letter | 1/25/2002 | P-180 | O.6.3 |
| CL-37/1 | Nordlund, James M. | Letter | 1/25/2002 | P-181 | O.4.1.1 |
| CL-38/1 | Woelker, Roger | Letter | 1/27/2002 | P-182 | O.2.3.4 |
| CL-38/2 | Woelker, Roger | Letter | 1/27/2002 | P-182 | O.5.9 |
| CL-38/3 | Woelker, Roger | Letter | 1/27/2002 | P-182 | O.2.3.4 |
| CL-38/4 | Woelker, Roger | Letter | 1/27/2002 | P-182 | O.5.5 |
| CL-38/5 | Woelker, Roger | Letter | 1/27/2002 | P-182 | O.1.6 |
| CL-38/6 | Woelker, Roger | Letter | 1/27/2002 | P-182 | O.4.3 |
| CL-38/7 | Woelker, Roger | Letter | 1/27/2002 | P-182 | O.4.1.1 |
| CL-39/1 | Moore, Anne | Letter | 1/28/2002 | P-183 | O.6.5 |
| CL-39/2 | Moore, Anne | Letter | 1/28/2002 | P-183 | O.4.2 |
| CL-39/3 | Moore, Anne | Letter | 1/28/2002 | P-183 | O.4.1.1 |
| CL-39/4 | Moore, Anne | Letter | 1/28/2002 | P-183 | O.4.8 |
| CL-39/5 | Moore, Anne | Letter | 1/28/2002 | P-183 | O.2.2 |
| CL-39/6 | Moore, Anne | Letter | 1/28/2002 | P-183 | O.1.6 |
| CL-40/1 | Runkle, John | Letter | 1/28/2002 | P-184 | O.1.16 |
| CL-40/2 | Runkle, John | Letter | 1/28/2002 | P-184 | O.1.6 |
| CL-40/3 | Runkle, John | Letter | 1/28/2002 | P-184 | O.4.8 |
| CL-40/4 | Runkle, John | Letter | 1/28/2002 | P-184 | O.4.1.1 |
| CL-41/1 | Schlau, Benjamin | Letter | 1/29/2002 | P-185 | O.6.5 |
| CL-41/2 | Schlau, Benjamin | Letter | 1/29/2002 | P-185 | O.4.5 |
| CL-42/1 | Ferguson, Tom | Letter | 1/29/2002 | P-186 | O.2.3.3 |
| CL-42/2 | Ferguson, Tom | Letter | 1/29/2002 | P-186 | O.4.4 |
| CL-42/3 | Ferguson, Tom | Letter | 1/29/2002 | P-186 | O.2.4.1 |
| CL-42/4 | Ferguson, Tom | Letter | 1/29/2002 | P-186 | O.6.3 |
| CL-42/5 | Ferguson, Tom | Letter | 1/29/2002 | P-186 | O.6.3 |
| CL-43/1 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.2.3.4 |
| CL-43/2 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.4.2 |
| CL-43/3 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.2.3.3 |
| CL-43/4 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.4.8 |
| CL-43/5 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.1.6 |
| CL-43/6 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.1.6 |
| CL-43/7 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.5.8 |
| CL-43/8 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.1.16 |
| CL-43/9 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.5.2 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|----------------------|--------|-----------|-------------------------------------|--|
| CL-43/10 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.5.5 |
| CL-43/11 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O 2.2 |
| CL-43/12 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.5 2 |
| CL-43/13 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.4.7 |
| CL-43/14 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.4.7 |
| CL-43/15 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.5.9 |
| CL-43/16 | Reed, Mary S. | Letter | 1/29/2002 | P-187 | O.5.2 |
| CL-44/1 | Borchamann, Patricia | Letter | 1/29/2002 | P-188 | O.1.16 |
| CL-44/2 | Borchamann, Patricia | Letter | 1/29/2002 | P-188 | O.1.16 |
| CL-44/3 | Borchamann, Patricia | Letter | 1/29/2002 | P-188 | O.1.16 |
| CL-44/5 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O.2.3.4 |
| CL-44/6 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O 4.2 |
| CL-44/7 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O.1.6 |
| CL-44/8 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O 5.9 |
| CL-44/9 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O 2 2 |
| CL-44/10 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O 5.5 |
| CL-44/11 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O 2.2 |
| CL-44/12 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O 4.7 |
| CL-44/13 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O.4.7 |
| CL-44/14 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O 2 2 |
| CL-44/15 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O.5 2 |
| CL-44/16 | Borchamann, Patricia | Letter | 1/29/2002 | P-189 | O.1.9 |
| CL-45/1 | McKeown, Diana S. | Letter | 1/30/2002 | P-190 | O.5.2 |
| CL-45/2 | McKeown, Diana S. | Letter | 1/30/2002 | P-190 | O.1.6 |
| CL-45/3 | McKeown, Diana S. | Letter | 1/30/2002 | P-190 | O.1.16 |
| CL-46/1 | Ferguson, Tom | Letter | 1/30/2002 | P-191 | O.5 2 |
| CL-46/2 | Ferguson, Tom | Letter | 1/30/2002 | P-191 | O.5.2 |
| CL-46/3 | Ferguson, Tom | Letter | 1/30/2002 | P-191 | O 4.4 |
| CL-46/4 | Ferguson, Tom | Letter | 1/30/2002 | P-191 | O.1.7 |
| CL-46/5 | Ferguson, Tom | Letter | 1/30/2002 | P-191 | O 6.3 |
| CL-46/6 | Ferguson, Tom | Letter | 1/30/2002 | P-191 | O.6.3 |
| CL-47/1 | Ritter, David | Letter | 1/30/2002 | P-192 | O 6.5 |
| CL-47/2 | Ritter, David | Letter | 1/30/2002 | P-192 | O 6.5 |
| CL-47/3 | Ritter, David | Letter | 1/30/2002 | P-192 | O.6.4 |
| CL-47/4 | Ritter, David | Letter | 1/30/2002 | P-192 | O.5.2 |
| CL-47/5 | Ritter, David | Letter | 1/30/2002 | P-192 | O 6.4 |
| CL-47/6 | Ritter, David | Letter | 1/30/2002 | P-192 | O.2.4 2 |
| CL-47/7 | Ritter, David | Letter | 1/30/2002 | P-192 | O 4 3 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|--------|-----------|----------------------------|--|
| CL-47/8 | Ritter, David | Letter | 1/30/2002 | P-192 | O 2.2 |
| CL-47/9 | Ritter, David | Letter | 1/30/2002 | P-192 | O.2.3 4 |
| CL-47/10 | Ritter, David | Letter | 1/30/2002 | P-193 | O.5.9 |
| CL-47/11 | Ritter, David | Letter | 1/30/2002 | P-193 | O.5.9 |
| CL-47/12 | Ritter, David | Letter | 1/30/2002 | P-193 | O.5.2 |
| CL-47/13 | Ritter, David | Letter | 1/30/2002 | P-193 | O.5.5 |
| CL-47/14 | Ritter, David | Letter | 1/30/2002 | P-193 | O.2.3 4 |
| CL-47/15 | Ritter, David | Letter | 1/30/2002 | P-193 | O.2.3 4 |
| CL-47/16 | Ritter, David | Letter | 1/30/2002 | P-193 | O.4.1.1 |
| CL-47/17 | Ritter, David | Letter | 1/30/2002 | P-193 | O.1.9 |
| CL-47/18 | Ritter, David | Letter | 1/30/2002 | P-194 | O.5.4 |
| CL-48/1 | Gunter, Paul | Letter | 1/30/2002 | P-195 | O.5.2 |
| CL-48/2 | Gunter, Paul | Letter | 1/30/2002 | P-195 | O.2.2 |
| CL-48/3 | Gunter, Paul | Letter | 1/30/2002 | P-195 | O.1.16 |
| CL-48/4 | Gunter, Paul | Letter | 1/30/2002 | P-195 | O.5.2 |
| CL-48/5 | Gunter, Paul | Letter | 1/30/2002 | P-195 | O.2.1 |
| CL-48/6 | Gunter, Paul | Letter | 1/30/2002 | P-195 | O.5.9 |
| CL-48/7 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.6.4 |
| CL-48/8 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.6.4 |
| CL-48/9 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.1.9 |
| CL-48/10 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.4.3 |
| CL-48/11 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.5.4 |
| CL-48/12 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.5.4 |
| CL-48/13 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.5.4 |
| CL-48/14 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.1.6 |
| CL-48/15 | Gunter, Paul | Letter | 1/30/2002 | P-196 | O.4.6 |
| CL-48/16 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.4.6 |
| CL-48/17 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.4.1.1 |
| CL-48/18 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.1.9 |
| CL-48/19 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.2.1 |
| CL-48/20 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.1.9 |
| CL-48/21 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.1.9 |
| CL-48/22 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.4.10 |
| CL-48/23 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.4.10 |
| CL-48/24 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.1.9 |
| CL-48/25 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.5.9 |
| CL-48/26 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.5.5 |
| CL-48/27 | Gunter, Paul | Letter | 1/30/2002 | P-197 | O.5.2 |
| CL-48/28 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3 2 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|--------|-----------|-------------------------------------|--|
| CL-48/29 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.4 |
| CL-48/30 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.4 |
| CL-48/31 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.4 |
| CL-48/32 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.3 |
| CL-48/33 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.4 |
| CL-48/34 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.4 |
| CL-48/35 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.4 |
| CL-48/36 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.4 |
| CL-48/37 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.4.2 |
| CL-48/38 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.2.3.3 |
| CL-48/39 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.1.6 |
| CL-48/40 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.1.6 |
| CL-48/41 | Gunter, Paul | Letter | 1/30/2002 | P-198 | O.1.6 |
| CL-48/42 | Gunter, Paul | Letter | 1/30/2002 | P-199 | O.5.8 |
| CL-48/43 | Gunter, Paul | Letter | 1/30/2002 | P-199 | O.5.9 |
| CL-48/44 | Gunter, Paul | Letter | 1/30/2002 | P-199 | O.5.2 |
| CL-48/45 | Gunter, Paul | Letter | 1/30/2002 | P-199 | O.5.5 |
| CL-48/46 | Gunter, Paul | Letter | 1/30/2002 | P-199 | O.2.2 |
| CL-48/47 | Gunter, Paul | Letter | 1/30/2002 | P-199 | O.5.2 |
| CL-48/48 | Gunter, Paul | Letter | 1/30/2002 | P-199 | O.4.7 |
| CL-48/49 | Gunter, Paul | Letter | 1/30/2002 | P-199 | O.4.1.1 |
| CL-49/1 | Greene, Eileen | Letter | 1/31/2002 | P-200 | O.1.6 |
| CL-49/2 | Greene, Eileen | Letter | 1/31/2002 | P-200 | O.1.6 |
| CL-50/1 | Katz, Deb | Letter | 1/31/2002 | P-201 | O.2.2 |
| CL-50/2 | Katz, Deb | Letter | 1/31/2002 | P-201 | O.2.2 |
| CL-50/3 | Katz, Deb | Letter | 1/31/2002 | P-201 | O.5.8 |
| CL-50/4 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.5.4 |
| CL-50/5 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.2.2 |
| CL-50/6 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.2.2 |
| CL-50/7 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.3.0 |
| CL-50/8 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.5.2 |
| CL-50/9 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.5.2 |
| CL-50/10 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.1.6 |
| CL-50/11 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.4.6 |
| CL-50/12 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.2.1 |
| CL-50/13 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.4.6 |
| CL-50/14 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.4.6 |
| CL-50/15 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.3.0 |
| CL-50/16 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.1.6 |

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|--------|-----------|----------------------------|--|
| CL-50/17 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.1.6 |
| CL-50/18 | Katz, Deb | Letter | 1/31/2002 | P-202 | O.3.0 |
| CL-50/19 | Katz, Deb | Letter | 1/31/2002 | P-202 | O 4.2 |
| CL-50/20 | Katz, Deb | Letter | 1/31/2002 | P-203 | O.1.6 |
| CL-50/21 | Katz, Deb | Letter | 1/31/2002 | P-203 | O.2.3.4 |
| CL-50/22 | Katz, Deb | Letter | 1/31/2002 | P-203 | O 2.2 |
| CL-50/23 | Katz, Deb | Letter | 1/31/2002 | P-203 | O 4.4 |
| CL-50/24 | Katz, Deb | Letter | 1/31/2002 | P-203 | O.5.2 |
| CL-50/25 | Katz, Deb | Letter | 1/31/2002 | P-203 | O.1.7 |
| CL-50/26 | Katz, Deb | Letter | 1/31/2002 | P-203 | O 4.6 |
| CL-50/27 | Katz, Deb | Letter | 1/31/2002 | P-203 | O 5.2 |
| CL-50/28 | Katz, Deb | Letter | 1/31/2002 | P-203 | O 2.4.1 |
| CL-51/1 | Drey, Kay | Letter | 1/30/2002 | P-204 | O 1.16 |
| CL-51/2 | Drey, Kay | Letter | 1/30/2002 | P-204 | O 4.6 |
| CL-51/3 | Drey, Kay | Letter | 1/30/2002 | P-204 | O 4.6 |
| CL-51/4 | Drey, Kay | Letter | 1/30/2002 | P-204 | O 4.6 |
| CL-51/5 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.5.1 |
| CL-51/6 | Drey, Kay | Letter | 1/30/2002 | P-205 | O 6.1 |
| CL-51/7 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.2.3.4 |
| CL-51/8 | Drey, Kay | Letter | 1/30/2002 | P-205 | O 2.3.4 |
| CL-51/9 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.1.3 |
| CL-51/10 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.1.6 |
| CL-51/11 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.1.8 |
| CL-51/12 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.2.3.4 |
| CL-51/13 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.1.6 |
| CL-51/14 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.2.3.4 |
| CL-51/15 | Drey, Kay | Letter | 1/30/2002 | P-205 | O 1.2 |
| CL-51/16 | Drey, Kay | Letter | 1/30/2002 | P-205 | O 4.8 |
| CL-51/17 | Drey, Kay | Letter | 1/30/2002 | P-205 | O 4.8 |
| CL-51/18 | Drey, Kay | Letter | 1/30/2002 | P-205 | O 4.8 |
| CL-51/19 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.4.10 |
| CL-51/20 | Drey, Kay | Letter | 1/30/2002 | P-205 | O.2.2 |
| CL-51/21 | Drey, Kay | Letter | 1/30/2002 | P-206 | O.2.4.1 |
| CL-51/22 | Drey, Kay | Letter | 1/30/2002 | P-206 | O.4.3 |
| CL-51/23 | Drey, Kay | Letter | 1/30/2002 | P-206 | O 4.8 |
| CL-51/24 | Drey, Kay | Letter | 1/30/2002 | P-206 | O.2.2 |
| CL-51/25 | Drey, Kay | Letter | 1/30/2002 | P-206 | O 4.8 |
| CL-51/26 | Drey, Kay | Letter | 1/30/2002 | P-206 | O 2.2 |
| CL-51/27 | Drey, Kay | Letter | 1/30/2002 | P-206 | O 6.5 |

Appendix O

Table O.1. (contd)

| Comment No. | Speaker or Author | Source | Date | Comment Page in Appendix P | Section of Appendix O where comment is addressed |
|-------------|-------------------|--------|-----------|----------------------------|--|
| CL-51/28 | Drey, Kay | Letter | 1/30/2002 | P-206 | O.2.2 |
| CL-52/1 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.6.5 |
| CL-52/2 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.5.4 |
| CL-52/3 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.5.4 |
| CL-52/4 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.2.2 |
| CL-52/5 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.2.2 |
| CL-52/6 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.5.2 |
| CL-52/7 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.5.2 |
| CL-52/8 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.5.9 |
| CL-52/9 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.5.4 |
| CL-52/10 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.5.4 |
| CL-52/11 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.4.8 |
| CL-52/12 | Johnsrud, Judith | Letter | 2/21/2002 | P-207 | O.1.6 |
| CL-52/13 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.1.6 |
| CL-52/14 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.4.7 |
| CL-52/15 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.4.1.1 |
| CL-52/16 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.4.1.1 |
| CL-52/17 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.4.1.1 |
| CL-52/18 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.4.1.1 |
| CL-52/19 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.1.6 |
| CL-52/20 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.1.6 |
| CL-52/21 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.1.6 |
| CL-52/22 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.2.4.3 |
| CL-52/23 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.2.2 |
| CL-52/24 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.2.2 |
| CL-52/25 | Johnsrud, Judith | Letter | 2/21/2002 | P-208 | O.6.5 |
| CL-53/1 | Becker, Rochelle | Letter | 2/2/2002 | P-209 | O.5.2 |
| CL-53/2 | Becker, Rochelle | Letter | 2/2/2002 | P-209 | O.2.4.1 |
| CL-53/3 | Becker, Rochelle | Letter | 2/2/2002 | P-209 | O.5.9 |
| CL-53/4 | Becker, Rochelle | Letter | 2/2/2002 | P-209 | O.4.4 |
| CL-53/5 | Becker, Rochelle | Letter | 2/2/2002 | P-209 | O.5.2 |
| CL-53/6 | Becker, Rochelle | Letter | 2/2/2002 | P-209 | O.5.2 |