

# HARMON & WEISS

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OF COUNSEL  
L. THOMAS GALLOWAY

September 16, 1982

Roy Lessy, Esquire  
7735 Olde Georgetowne Road  
Bethesda, Maryland

Thomas G. Dignan, Esquire  
Ropes and Gray  
225 Franklin Street  
Boston, Massachusetts 02210

Gentlemen:

NECNP has assembled five experts to examine and testify concerning the adequacy of security provisions at Seabrook. They include Robert D. Pollard of the Union of Concerned Scientists and Paul C. Leavitt, former Chief of Police of the Town of Hampton, New Hampshire, whose qualifications were presented to you and the Board in a letter of July 9, 1982. In addition, Patrick R. Lowrey and Herbert M. Dixon of Draco Lion International, Inc., and Robert Mark, current Chief of the Hampton Police Department are assisting us on this issue.

As their resumes indicate, these five witnesses possess the "practical knowledge or its equivalent" necessary for qualification to examine the Seabrook security plan. Pacific Gas and Electric Company (Diablo Canyon Nuclear Power Plant, Units 1 and 2), 8 NRC 567, 569 (1978). Mr. Pollard's experience was discussed in our filing of April 12, 1982, and is described in the summary of his qualifications. His highly technical familiarity with the design of nuclear reactors, acquired over many years of experience with the NRC in such positions as a Reactor Engineer and Project Manager, have given him the expertise necessary to identify ways in which the reactor will be vulnerable to sabotage.

As Chief of the Hampton Police Department, Mr. Mark has first hand knowledge of the responsibilities and capabilities of the Hampton Police Department to respond to a sabotage incident at the Seabrook reactor. Mr. Leavitt has also served as Chief of Police for the Town of Hampton.

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Messrs. Lessy and Dignan  
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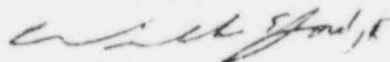
In addition, he has had considerable experience with the designing and evaluation of security plans, having reviewed or developed at least fifty during his career. In addition, as police chief he handled cases of sabotage to the municipal fire protection and lighting systems. Mr. Leavitt has dealt with the security problems of local businesses on a daily basis for many years, concerning the designing and evaluation of plans and the handling of both internal and external sabotage.

As described in their resumes, Mr. Dixon and Mr. Lowrey have extensive experience in the design and analysis of security equipment and plans, including plans for nuclear power plants. Mr. Dixon, who possesses special expertise in security hardware, has evaluated the performance and reliability of security equipment for both the nuclear industry and the government over the past nine years. Mr. Dixon has also participated in a joint study of nuclear plant security by the NRC, the Department of Defense, and the Department of Energy. Mr. Lowrey, who specializes in security program design development, implementation, and management, has ten years' experience in the evaluation of security force training for both industry and government.

Both Mr. Lowrey and Mr. Dixon have overseas commitments until early October. Therefore, we propose that sometime around October 15, we and NECNP's experts visit Seabrook to examine the plan and the site. We can then draw up specific contentions shortly thereafter.

Please let me know soon whether you will agree to this approach and what other information, if any, you would like us to provide.

Sincerely,



William S. Jordan, III

Enclosures

cc: Seabrook Service List

ROBERT D. POLLARD  
QUALIFICATIONS

Mr. Pollard is presently employed as a nuclear safety expert with the Union of Concerned Scientists, a non-profit coalition of scientists, engineers and other professionals supported by over 80,000 public sponsors.

Mr. Pollard's formal education in nuclear design began in May, 1959, when he was selected to serve as an electronics technician in the nuclear power program of the U.S. Navy. After completing the required training, he became an instructor responsible for teaching naval personnel both the theoretical and practical aspects of operation, maintenance and repair for nuclear propulsion plants. From February, 1964 to April, 1965, he served as senior reactor operator, supervising the reactor control division of the U.S.S. Sargo, a nuclear-powered submarine.

After his honorable discharge in 1965, Mr. Pollard attended Syracuse University, where he received the degree of Bachelor of Science magna cum laude in Electrical Engineering in June, 1969.

In July, 1969, Mr. Pollard was hired by the Atomic Energy Commission (AEC), and continued as a technical expert with the AEC and its successor the United States Nuclear Regulatory Commission (NRC) until February, 1976. After joining the AEC, he studied advanced electrical and nuclear engineering at the Graduate School of the University of New Mexico in Albuquerque. He subsequently advanced to the positions of Reactor Engineer (Instrumentation) and Project Manager with AEC/NRC.

As a Reactor Engineer, Mr. Pollard was primarily responsible for performing detailed technical reviews analyzing and evaluating the adequacy of the design of reactor protection systems, control systems and emergency electrical power systems in proposed nuclear facilities. In September 1974, he was promoted to the position of Project Manager and became responsible for planning and coordinating all aspects of the design and safety reviews of applications for licenses to construct and operate several commercial nuclear power plants. He served as Project Manager for the review of a number of nuclear power plants including: Indian Point, Unit 3, Comanche Peak, Units 1 and 2, and Catawba, Units 1 and 2. While with NRC, Mr. Pollard also served on the standards group, participating in developing standards and safety guides, and as a member of IEEE Committees.

PAUL C. LEAVITT  
QUALIFICATIONS

Mr. Leavitt is the founder and Chief of the Department of Public Safety in the Town of Waterville, New Hampshire, the largest mountain resort community in the state of New Hampshire. Between 1955 and 1969, Mr. Leavitt served on the Hampton, New Hampshire, Police Department. Four of these years were spent as the commanding officer of the Detective Division; during the last five years, Mr. Leavitt was Chief of the Department. During his career, Mr. Leavitt has designed and evaluated at least fifty security plans for local businesses ranging from small grocery stores to large recreational operations. While he was Chief of Police, he handled two sabotage incidents in the area, involving the municipal fire protection and lighting systems.

Mr. Leavitt's educational experience includes the FBI National Academy, where he studied administration and criminal investigation; the State of New Hampshire Police Academy, where he studied general law enforcement; Northeastern University, where he studied criminal investigation, management, and police administration; and St. Anselms College, Manchester, New Hampshire, where he studied criminal investigation and criminal control procedures, as well as criminal records and criminal law.

ROBERT EDWARD MARK  
19-B Thorwald Avenue  
Hampton, New Hampshire 03842  
(603) 926-5104

EXPERIENCE:

2/80-Present      Chief of Police: Responsible for planning, directing, controlling, and staffing all activities of the department. Exercise all lawful powers of the office and issue such lawful orders as are necessary to assure the effective functioning of the department. May delegate to a member of the department certain duties related to planning and training. Position is the Chief Executive Officer of the department and the final department authority in all matters of policy, operations, and discipline.

9/79-2/80      Acting Chief

3/76-2/80      Deputy Chief: Responsible for assisting in the administration of departmental operations. Assigning personnel deployment, directing personnel operations, monitoring performance and assisting in personnel selection. Responsible for maintaining all departmental equipment and supervising the training of all personnel. Additionally, charged with the operational management of the department during the absence of the Chief of Police.

10/76-4/77      Acting Chief: Appointed Acting-Interim Chief. Responsible for the administration and operation of all Police activities within the Town of Hampton, including budget preparation, public relations and personnel management.

5/71-2/76      Patrol Sergeant: Charged with the supervision of patrol shifts, consisting of between four and sixteen patrol officers. Responsible for the general inspection of all department equipment, and the welfare and security of all persons being booked and detained during my tour of duty.

1/70-4/71      Patrol Officer: Responsible for executing routine patrol duties within the Town of Hampton.

7/69-12/69      State Trooper: State of New Hampshire, Department of Safety Division of State Police. Responsible for executing routine duties of a State Trooper, concerned with the protection of life and property and upholding the laws of the State of New Hampshire.

4/68-6/69      Patrol Officer: Town of Hampton, New Hampshire. Responsible for regular patrol duties, both mobile and foot patrol. Concerned with the protection of life and property and upholding the laws of the State of New Hampshire.

MILITARY SERVICE:

6/64-4/68      United State Air Force: Received Honorable Discharge on 4/1/68. Rank at date of discharge was Sergeant. Assigned to Senior Security Police position at Pease Air Force Base, Newington, N.H. Responsible for the preparation of an accurate desk log of all

MILITARY SERVICE  
(Contd.)

routine and emergency incidents that occurred during tour of duty. Responsible for dispatching patrols to all incidents occurring on base. Submitted reports on all offenses or incidents. Familiarized with all office instructions, regulations and directives pertaining to the field of Law Enforcement.

EDUCATION:

9/60-10/74

Police-Related Training:

Medico-Legal Forensic Seminar  
October 1974

State of New Hampshire - Breathalyzer School  
May 1972

New Hampshire State Police Academy  
July/August 1969

BEDAC Drug Seminar  
December 1968

New Hampshire State Police Academy  
October/November 1968

Rockingham County Law Enforcement School  
May/November 1968

Hampton Police Training School  
May 1968

Riot Control School, Pease Air Force Base  
September 1967

Combat Defense School, Pease Air Force Base  
December 1965

USAF Police Training School  
September 1964

St. Anselm's College, Manchester, New Hampshire  
1968 to present (A.A. in Criminal Justice,  
working towards B.A. degree in same).

Other Schools:

Miami Military Academy, Miami, Florida  
September 1960 to May 1962

Craftsbury School, Craftsbury Common, Vermont  
January 1960 to May 1960

Yorktown Heights High School, Yorktown Heights, New York  
September 1953 to May 1960

PERSONAL DATA:

Date of Birth: June 17, 1943; Bronx, New York  
Health: Excellent  
Married; 1 Child

REFERENCES:

Furnished upon request.



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## STAFF RESUME

DR. HERBERT M. DIXON, CPP

### PROFESSIONAL EXPERIENCE

Prior to joining DLI, INC. Dr. Dixon served as Director, Department of Security Equipment Programs, Northrop-Page Communications Engineers, Vienna, Virginia. He was responsible for the management of the security equipment requirements, security survey, security system definition, component test and evaluation, and security system installation elements of the corporation. He oversaw all aspects of security system implementation aimed at protecting nuclear and other energy sources, border areas, airports, business facilities, and other high value assets. In addition, he assisted in defining communications requirements for national security systems.

Office, Under Secretary of Defense for Research and Engineering:

Previously, he was Chairman, U.S. Department of Defense Physical Security Equipment Action Group, Office Under Secretary of Defense for Research and Engineering, the Pentagon, Washington, D.C. He managed research, engineering, international procurement, installation and maintenance programs dealing with physical security electronic sensors, communications systems and other security hardware.

Served as a member of the Department of Defense, Nuclear Regulatory Commission, and Department of Energy Committee on Nuclear Safety and Security; served on the Interdepartmental Counterterrorism R&D Committee, chaired by U.S. Department of State; member of Explosive Tagging and Identification Committee, chaired by the U.S. Treasury Department; and served as technical advisor to the Interdepartmental Committee on Security and Safety Equipment, chaired by the General Administration (GSA); also was a member of the Theater Nuclear Forces Survivability, Safety, and Security Working Group, chaired by the Assistant to the Secretary of Defense for Atomic Energy.

He served as the Secretary of Defense representative in negotiations with the Federal Republic of Germany and the United Kingdom in safety and security programs aimed at protecting nuclear and chemical weapon storage facilities.

Prior to this, Dr. Dixon was Military Assistant (Army) to the Assistant to the Secretary of Defense for Atomic Energy. He was responsible for nuclear matters pertaining to Army weapon systems and storage sites; personnel reliability, electronic sensors available and under development; and budgeting data concerning these efforts.

Office of Chairman of the Joints Chiefs of Staff:

While with the Office of the Joint Chiefs of Staff, the Pentagon, Washington, D.C., he was responsible for developing requirements for the safety and security of nuclear release communications devices which ensured Presidential control of the SAFEGUARD antiballistic missile defense system. He developed requirements to ensure electro-magnetic compatibility and security of interface equipment required to permit operation of strategic offensive and defensive systems in the same environment.

He served as Plans Officer for North American Air Defense which included Contingency Planning for mass evacuation of the U.S. population in selected areas, planned for transporting, storing and protecting of nuclear and chemical weapons and other hazardous substances located in the continental U.S. Selected to serve on the security staff of the Secretary of State during the inauguration of the President of the United States.

Office of the Assistant Secretary of the Army for Research and Engineering:

As Deputy for Air and Missile Defense to the Assistant Secretary of the Army (Research and Development), the Pentagon, Washington, D.C., he provided oversight of the development of the PATRIOT, STINGER, HAWK and ROLAND air defense systems to include techniques and approaches for accomplishing security and survivability of these systems.

Department of the Army: Various Command and staff positions:

As Commanding Officer of a Hawk Air Defense Missile Battalion, his duties included the safety and security of its combat equipment, the personnel assigned to the organization, and the firing range facilities required for operational testing of unit efficiency.

Appointed to the position of Chief, Nuclear Weapons Maintenance Instruction Program for NIKE Hercules. This 46-week course of instruction included 320 hours in electricity and electronics and 1520 hours in radars, communications equipment maintenance and nuclear warhead assembly.



Dr. Dixon has also served in the U.S. Army in Vietnam and was responsible for coordinating the design of the defenses of Saigon against terrorist attack and countermortar detection scheme. He developed the strategy for armor warfare in II Corps Vietnam, and developed the strategy for Operation "Pony Express" in the IV Corp area.

#### EDUCATION

B.B.A. University of Texas  
M.A. Public Affairs, Nova University, Florida  
M.S. Political Science, Pennsylvania  
Doctorate, Management and Public Administration, Nova University  
U.S. Army Command and Staff College, Kansas  
U.S. Army War College, Pennsylvania  
U.S. Army Air Defense Missile Radar Design Course, Texas  
U.S. Army Air Defense Missile Maintenance Management, Texas  
U.S. Army Chemical, Biological, and Nuclear School, Germany  
U.S. Army Mapping and Survey School, Germany

#### PROFESSIONAL CERTIFICATION

CERTIFIED PROTECTION PROFESSIONAL (CPP) Certificate  
Number 893 by the American Society for Industrial Security

#### PROFESSIONAL ASSOCIATIONS

American Society for Industrial Security  
American Defense Preparedness Association  
The Retired Officers Association  
Association of the United States Army  
The Association for the Advancement of Safety and Security  
Sensors Technology (The CRICKET Society)

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## STAFF RESUME

PATRICK R. LOWREY

### **PROFESSIONAL EXPERIENCE:**

Mr. Lowrey has over 20 years progressive experience in law enforcement and physical security in Europe, Asia, South America, and the United States. As a member of the private sector for approximately 3 years, he has managed a number of loss prevention projects for American and foreign multi-national corporations. These diverse efforts focused on increasing physical protection of corporate assets while reducing security costs and at the same time improving profit margins. During this period, he lectured for the National Bureau of Standards, the International Association of Chiefs of Police, and the Defense Nuclear Agency on physical security matters including counter-terrorism. As an Army officer, he held the senior staff position in the Pentagon for Army-wide law enforcement and physical security.

Mr. Lowrey has participated in the assessment of physical security at sensitive facilities throughout the world. He has managed the design of "turnkey" security systems at sites in both public and private American sectors. He is considered an expert in the state-of-the-art of physical security hardware technology. He chaired a study of the threat of international terrorism to the Army's facilities, resulting in a special focus by the Army to this key issue.

As the senior Army official responsible for physical security of Army assets, Mr. Lowrey directed the promulgation and compliance of the Army regulation 190 series relating to policy and procedures for physical security, including conventional arms and ammunition and nuclear and chemical weapons storage sites. As Chief of Army Law Enforcement and Chairman of the Physical Security Review Board (DAPSRB), he managed the Army's FYDP (Five-Year Defense Program) for the worldwide deployment of 24,000 military police and security guards.

He managed the program and budget for Army deployment of J-SIIDS (Joint Service Intrusion Detection System) through the development of policy guidance and participation in the HQDA program prioritization process. He conducted the quarterly review and analysis of all obligated physical security program funds for presentation to the Army secretariat and OSD with recommendations and justifications for use. Mr. Lowrey appeared before the Congress as an expert witness regarding the losses of arms and ammunition throughout the Army.

Mr. Lowrey, for 2 years, directed basic and advanced individual training (police and physical security) for over 18,000 Army and Marine Corps recruits. He administered a training organization with a staff and faculty of 300.

Subsequently, as Director of Training Development for the Military Police School, he initiated and managed the revision of the Army's Field Manual 19-30, "Physical Security," which details the doctrine for physical security in both peacetime and combat environments. This manual bridges the gap between users' (tactical commanders) requirements and RDT&E efforts in tactical and non-tactical sensor system add-ons to J-SIIDS. At both the Military Police School and the Pentagon, Mr. Lowrey was personally involved in articulating users' requirements for future add-ons, such as FIDS (Facility Intrusion Detection Systems) and REMBASS (Remotely Monitored Battlefield Sensor System). Mr. Lowrey conducted hundreds of discussions with field commanders relative to their special concerns and problems associated with J-SIIDS implementation.

Of his many staff and line positions, Mr. Lowrey held several key Army positions involving security operations. In Viet Nam, he commanded a 900-man combined police and security battalion with responsibility for the capitol city and surrounding province. In Philadelphia, Pennsylvania, he directed simultaneous security operations for three diverse and geographically separated installations, including an arsenal, a logistics depot, and an electronics procurement agency. In Korea, he commanded a 250-man security company that provided rail transport security for all U.S. Army materiel transported throughout the Korean peninsula. This was a one of a kind organization in the Army during this period.

**EDUCATION:** MA, Public Administration, Pennsylvania State University  
BA, Government and Politics, University of Maryland  
US Army War College, National Security Affairs  
US Army Command and General Staff College, Senior Staff  
Management  
US Army Military Police School, Law Enforcement and Security  
Management