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October 14, 1983

Judge Thomas S. Moore, Chairman
Judge John H. Buck
Judge W. Reed Johnson
Atomic Safety and Licensing Appeal Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Docket No. 50-275
Docket No. 50-323

Dear Judges Moore, Buck and Johnson:

In accordance with the Appeal Board's Order of October 7, 1983, enclosed is the prefiled direct testimony of witnesses from the Independent Design Verification Program (IDVP), the qualifications of such witnesses and the exhibit list of the IDVP.

The prefiled direct testimony consists of:

- (1) Testimony on Behalf of the Independent Design Verification Program of Dr. William E. Cooper, Dr. Robert L. Cloud, Mr. John E. Krechting and Mr. Roger F. Reedy Regarding Contentions 1, 2 and 5-8;
- (2) Testimony on Behalf of the Independent Design Verification Program of Dr. Robert L. Cloud, Professor J. M. Biggs, Professor M. J. Holley, Jr. and Mr. Ronald Wray Regarding Contentions 3, 4.m. and 4.n.; and
- (3) Testimony on Behalf of the Independent Design Verification Program of Mr. John E. Krechting and Dr. William E. Cooper Regarding Contentions 4.a.-l. and o.-u.

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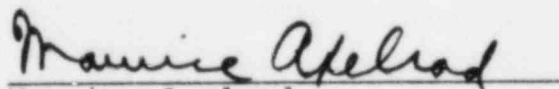
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The IDVP will present three panels, each of which will consist of the witnesses named in the titles of the foregoing testimony. As requested by the Board, we have identified clearly the witness or witnesses sponsoring each part of the testimony. However, in light of the collegial manner in which the work of the IDVP was conducted, it can be expected that, depending upon the questions that may be raised on cross-examination, members of panels will be able to contribute responses even with respect to portions of the testimony which they did not sponsor.

As required by the Board's Order, enclosed are affidavits as to qualifications of each of the foregoing witnesses, except Mr. Reedy. Mr. Reedy's unsworn qualifications are enclosed, and his affidavit will be supplied during the week of October 23, when he returns to his office.

The attached exhibit list identifies a sponsoring witness for each exhibit. Again in light of the collegial nature of the IDVP's efforts, other members of the panels will also be able to respond to questions concerning such exhibits or their participation therein.

Very truly yours,


Maurice Axelrad
David B. Raskin

Attorneys for the Independent
Design Verification Program

MA/aps
Enclosures
cc: Service List