

proceeding, Dr. Johnson testified particularly about the Staff and applicant's dose estimates; however, on cross-examination it became clear that Dr. Johnson was "unconversant with the Commission's regulations on the control of radiation emissions and the methodology for determining dose estimates." Id. at 1090. Applicants refer in their motion for summary disposition on Joint Contention II and Eddleman Contention 37B to the various rejections of Dr. Johnson's work by these well-recognized scientific and legal reviewers. Without offering any basis, much less a substantial basis, for their position, the Intervenor now baldly assert that Dr. Johnson is qualified to testify to a broad range of subjects, including NRC's standards for radiation exposure and NRC's radionuclide concentration models -- the subjects about which his expertise was substantially undermined in the Waterford proceeding.<sup>1/</sup>

Finally, Intervenor propose to have a psychiatrist, Dr. Morris Lipton, and a general practitioner, Dr. Barbara Wynn, testify about "the physical and psychic aspects of pain and

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<sup>1/</sup> Dr. Johnson also testified before a licensing board on the alleged under-estimation of radiological releases from the Clinch River Breeder Reactor ("CRBR") fuel cycle facilities. See United States Department of Energy Project Management Corp. et al. (Clinch River Breeder Reactor Plant), LBP-83-8, 17 N.R.C. 158 (1983), stay request denied, ALAB-721, 17 N.R.C. 539 (1983). In that proceeding, Dr. Johnson was found to have made an invalid comparison between the CRBR fuel cycle facilities and the Rocky Flats plutonium (weapons) production facility. Id. at 222. The Board also concluded that Dr. Johnson "had no specific training or experience that enabled him to make such comparisons." Id. at 222, 265.