

AFFIDAVIT

I, Susan L. Hiatt, OCRE Representative, duly sworn depose and say that:

A. the statements below are true to the best of my knowledge and belief;

B. OCRE will need approximately six (6) months to adequately respond to the Staff's motion for summary disposition of Issue #13 for the following reasons:

1. the experience of the recent hearing on quality assurance has demonstrated to OCRE the necessity of presenting a direct case. Since then OCRE has been trying diligently to locate persons having the required expertise to serve as witnesses and/or consultants on this and other issues. Such persons are very difficult to find. Apparently there are few persons having the expertise who are not associated with the nuclear industry or who do not charge exorbitant prices for their services. OCRE has located one person who has expressed his willingness to examine the documents OCRE has obtained through discovery from Staff and Applicants, but he is extremely busy and can only devote spare moments to this task. OCRE therefore speculates that it would take at least four (4) months for this person to examine all of the materials OCRE now possesses on Issue #13.

2. the turbine missile issue is of such technical complexity that OCRE must obtain technical expertise to assist it in evaluating the materials it already has and to assist in preparing appropriate discovery questions to further develop

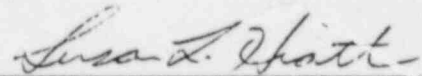
the record on this issue.

3. OCRE is, through a related soon-to-be-filed court action, seeking additional information necessary for its case on the turbine missile issue. Any further action on this issue should be deferred pending the court's ruling in said action, which may take at least six (6) months.

4. OCRE also speculates that, if available, expert witnesses may demand fees far in excess of OCRE's financial resources. OCRE will therefore need time to raise the funds necessary to secure the appearance of such witnesses. This may take at least six (6) months.

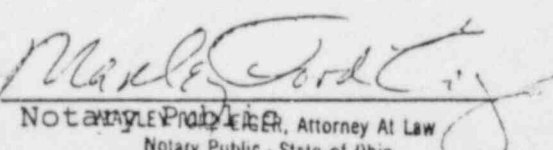
5. if, as OCRE hopes, further discovery is allowed on this issue, such discovery, including the time necessary to draft interrogatories, obtain answers from other parties, and, if necessary, file the appropriate motions to compel, would require approximately four (4) months, based on past experience.

6. since OCRE has other issues in this proceeding, and has limited resources, in terms of finances and personnel, it is just and proper to allow OCRE the time necessary to properly present its case on an issue important to the safety of the general public.

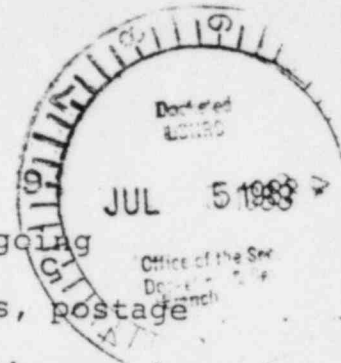


Susan L. Hiatt
OCRE Representative

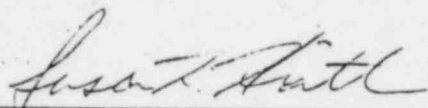
Sworn to and subscribed before me this 29th day of
June, 1983.


Notary Public, Attorney At Law
Notary Public - State of Ohio
My Commission has no expiration date,
Section 147.03 R. C.

CERTIFICATE OF SERVICE



This is to certify that copies of the foregoing
were served by deposit in the U.S. Mail, first class, postage
prepaid, this 29th day of June, 1983 to those on the service
list below.


Susan L. Hiatt

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