

UNITED STATES OF AMERICA
BEFORE THE NUCLEAR REGULATORY COMMISSION

In the Matter of

Vermont Yankee Nuclear
Power Corporation

(Vermont Yankee Nuclear
Power Station)

Docket No. 50-271-OLA

AFFIDAVIT OF ROBERT D. POLLARD

I, Robert D. Pollard, do make oath and say:

1) My name is Robert D. Pollard. Since February 1976, I have been employed as a nuclear safety engineer by the Union of Concerned Scientists. My business address is 1616 P Street, N.W., Washington, D.C. 20036. Previously, I was employed by the United States Nuclear Regulatory Commission as a Licensing Project Manager for commercial nuclear power plants.

2) In May 1959, I enlisted in the United States Navy and was selected to serve as an electronics technician in the nuclear power program. After completing the required training, I 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, I served as the senior reactor operator, supervising the reactor control division aboard the U.S.S. Sargo, a nuclear-powered submarine. In May 1963, I was honorably discharged from the U.S. Navy and attended Syracuse University, where I received the degree of Bachelor of Science magna cum laude in electrical engineering in June 1969.

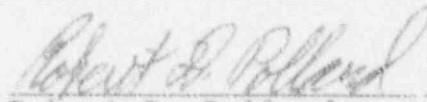
3) In July 1969, I was hired by the United States Atomic Energy Commission (AEC) and continued as a technical expert with the AEC and its successor, the United States Nuclear Regulatory Commission (NRC) until February 1976. After joining the AEC, I completed a year of graduate studies in advanced electrical and nuclear engineering at the Graduate School of the University of New Mexico in Albuquerque. I subsequently advanced to the positions of Reactor Engineer (Instrumentation) and Project Manager with AEC/NRC. As a Reactor Engineer, I was primarily responsible for performing detailed technical reviews analyzing and evaluating the adequacy of the design reactor protection systems, control systems and emergency electrical power systems in proposed nuclear facilities. In September 1974, I was promoted to the position of Project Manager and became responsible for safety reviews of applications for licenses to construct and operate several commercial power plants.

4) In the course of my six and a half years with the AEC and NRC, I performed technical reviews, analyses and evaluations of designs of systems and components necessary for safe operation of reactor facilities under normal, abnormal and emergency conditions for the purpose of determining whether such systems complied with NRC rules and provided an acceptable level of safety for the public.

5) For the past fifteen years, I, along with other members of the Union of Concerned Scientists' professional staff, have conducted numerous studies pertaining to the safety and reliability of nuclear power plants, both on a generic and plant-specific basis. I have provided technical analysis for UCS's participation in rulemaking proceedings before the Nuclear Regulatory Commission and for UCS's litigation against the NRC for failure to fulfill its responsibilities under the Atomic Energy Act. I testified before the President's Commission on the Accident at Three Mile Island which investigated the 1979 accident. I participated as an expert witness in the NRC adjudicatory proceeding on the restart of Three Mile Island Unit 1. I have also testified on matters pertaining to reactor safety before numerous committees of the United States Congress and various other state and local legislative and administrative bodies. Thus, my 23 years of professional experience on the technical staffs of the AEC, NRC, and UCS have given me first-hand knowledge of NRC regulations and how they are developed, administered, and interpreted.

6) I have reviewed all of the documents referenced in New England Coalition on Nuclear Pollution's Comments in Opposition to Proposed Finding of No Significant Hazards Consideration (February 22, 1993). I am also familiar with NRC regulations and regulatory guidance governing the design and operability of diesel generators.

7) The factual statements made in the attached New England Coalition on Nuclear Pollution's Comments in Opposition to Proposed Finding of No Significant Hazards Consideration are true and correct to the best of my knowledge and belief.


Robert D. Pollard

Subscribed and sworn to before me this 24 day of February, 1993.


Notary Public

My Commission expires 3/4/94.