

RA 31746

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

In the Matter of: : Docket No. 50-423-LA-3
: :
Northeast Nuclear Energy Company : :
: :
(Millstone Nuclear Power Station, : :
Unit No. 3) : ASLBP No. 00-771-01-LA

'00 MAY 25 A8:12

OFFICE OF
PUBLIC
AFFAIRS

CONNECTICUT COALITION AGAINST MILLSTONE AND
LONG ISLAND COALITION AGAINST MILLSTONE
SECIND SET OF INTERROGATORIES AND REQUEST FOR PRODUCTION
DIRECTED TO NUCLEAR REGULATORY COMMISSION STAFF

The Connecticut Coalition Against Millstone ("CCAM") and Long Island Coalition Against Millstone ("CAM") (collectively, "Intervenors") hereby request the Nuclear Regulatory Commission staff ("NRC") to answer this Second Set of Interrogatories, fully, in writing, under oath, and to produce the documents requested below, within the discovery deadline established in the Atomic Safety and Licensing Board Prehearing Conference Conference Order issued on February 9, 2000.

B1 Boron Dilution

(1) Please identify and describe any effort by NRC to determine the potential for dilution of soluble boron in the Millstone 3 pool, or to require such a determination by the applicant.

B2 Fuel Mispositioning

(1) Please identify and describe any effort by NRC to determine the potential for mispositioning of fuel assemblies in the Millstone 3 pool, or to require such a determination by the applicant.

B3 Calculations of K-EFF

(1) Please identify and describe any effort by NRC to calculate K-effective, or to require such calculations by the applicant, for various combinations of boron dilution and fuel mispositioning

Template = SECY-035

SECY-02

in the Millstone 3 pool.

Production

Please produce all relevant documents to substantiate your responses to Interrogatories B1, B2 and B3.

**CONNECTICUT COALITION AGAINST MILLSTONE
LONG ISLAND COALITION AGAINST MILLSTONE**

By:



Nancy Burton, Esq.
147 Cross Highway
Redding Ridge CT 06876
Tel. 203-938-3952

Dated at Redding, Connecticut
this 19th day of May, 2000.

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OFFICE OF THE SECRETARY
ADJUDICATIONS STAFF

CERTIFICATION

I hereby certify that copies of "Connecticut Coalition Against Millstone and Long Island Coalition Against Millstone Second Set of Interrogatories Directed to Nuclear Regulatory Commission Staff" in the above-captioned proceeding have been served on the following by deposit in the United States Mail, first class, and telefaxed to Ann P. Hodgdon, this 19th day of May, 2000.

David A. Repka, Esq.
Winston & Strom
1400 L Street NW
Washington DC 20005

Charles Bechhoefer
Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington DC 20555
(Attn: Rulemakings and
Adjudications Staff)
(original + two copies)

Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Adjudicatory File
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington DC 20555

Dr. Charles N. Kelber
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington DC 20555-0001

Office of Commission
Appellate Adjudication
U.S. Nuclear Regulatory Commission
Washington DC 20555

Ann P. Hodgdon
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington DC 20555
Telefax 301-415-3725


