

RAS 7747

RELATED CORRESPONDENCE

May 11, 2004

DOCKETED 05/12/2004

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
DUKE ENERGY CORPORATION) Docket Nos. 50-413-OLA, 50-414-OLA
(Catawba Nuclear Station, Units 1 and 2))

NRC STAFF SECOND SUPPLEMENTAL RESPONSE TO
BREDL'S FIRST DISCOVERY REQUEST

On April 14, 2004, the staff of the Nuclear Regulatory Commission (Staff), filed a response to Blue Ridge Environmental Defense League's First Set of Discovery directed to the NRC Staff (BREDL's First Discovery Request), filed March 31, 2004. The NRC Staff (Staff) filed its objections to BREDL's Request on April 12, 2004. The Staff hereby reiterates and renews each of its objections to BREDL's Request set forth in the Staff's Objection. Without waiving any previously made objections to BREDL's first discovery request, the Staff hereby files this supplemental response to BREDL's First Discovery Request.

GENERAL DOCUMENT PRODUCTION REQUESTS

GENERAL REQUEST NO. 2: All documents in your possession, custody or control relevant to each BREDL admitted contention, and to the extent possible, segregated by contention and separated from already produced documents.

STAFF RESPONSE: The staff provides the following additional documents in response to General Request No. 2. The following documents are publicly available at the locations listed. By providing documents in response to this request or any other portion of BREDL's Request, the Staff is not conceding that any of the answers or documents provided are material to the admitted contentions.

The Staff reserves the right to object to the introduction of any of these documents at hearing on the grounds that they are immaterial, irrelevant or outside the scope of the proceeding.

1. Regulatory Guide 1.4, "Assumptions Used for Evaluating the Potential Radiological Consequences of a Loss of Coolant Accident for Pressurized Water Reactors." (ML003739614)
2. Regulatory Guide 1.77 "Assumptions Used for Evaluating a Control Rod Ejection Accident for Pressurized Water Reactors." (ML003740279)
3. Regulatory Guide 1.183, "Alternative Radiological Source Terms for Evaluating Design Basis Accidents at Nuclear Power Reactors." (ML003716792)
4. NUREG-0800, Standard Review Plan, Chapter 15.3.3 / 15.3.4, "Reactor Coolant Pump Motor Seizure and Reactor Coolant Pump Shaft Break." nrc.gov/reading-rm/doc-collections/nuregs/staff.
5. NUREG-0800, Standard Review Plan, Chapter 15.4.8, "Spectrum of Rod Ejection Accidents (PWR)." nrc.gov/reading-rm/doc-collections/nuregs/staff.
6. NUREG-0800, Standard Review Plan, Chapter 15.6.5, "Loss-of-Coolant Accidents Resulting from Spectrum of Postulated Piping Breaks Within the Reactor Coolant Pressure Boundary." nrc.gov/reading-rm/doc-collections/nuregs/staff.
7. SECY-94-300, "Proposed Issuance of Final NUREG-1465, "Accident Source Terms for Light-Water Nuclear Power Plants," 12/15/1994. Public Document Room.
8. SECY-94-302, "Source Term-Related Technical and Licensing Issues Pertaining to Evolutionary and Passive Light-Water-Reactor Designs," 12/19/1994. Public Document Room.
9. SECY-98-154, "Results of the Revised (NUREG-1465) Source Term Rebaselining for Operating Reactors," 6/30/1998. www.nrc.gov/reading-rm/doc-collections/commission/secys/1998.

10. Federal Guidance Report No. 11, "Limiting Values of Radionuclide Intake and Air Concentration and Dose Conversion Factors for Inhalation, Submersion, and Ingestion," EPA-520/1-88-020. Available from the EPA.
11. "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents," EPA-400-R-92-001. Available from the EPA.

Respectfully submitted,

/RA/

Susan L. Uttal
Counsel for NRC Staff

Dated in Rockville, Maryland
This 11th day of May 2004.

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CORRECTED CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF SECOND SUPPLEMENTAL RESPONSE TO BREDL'S FIRST DISCOVERY REQUEST" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class; or as indicated by an asterisk (*), by deposit in the Nuclear Regulatory Commission's internal mail system; and by e-mail as indicated by a double asterisk (**), this 12th day of May, 2004.

Ann Marshall Young, Chair * **
Administrative Judge
Atomic Safety and Licensing Board
Panel
Mail Stop: T-3F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
(E-mail: AMY@nrc.gov)

Anthony J. Baratta * **
Administrative Judge
Atomic Safety and Licensing Board
Panel
Mail Stop: T-3F23
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001
(E-mail: AJB5@nrc.gov)

Thomas S. Elleman **
Administrative Judge
Atomic Safety and Licensing Board
Panel
5207 Creedmoor Rd. #101
Raleigh, NC 27612
(E-mail: elleman@eos.ncsu.edu)

Office of the Secretary * **
ATTN: Docketing and Service
U.S. Nuclear Regulatory Commission
Mail Stop: O-16C1
Washington, D.C. 20555
(E-mail: HEARINGDOCKET@nrc.gov)

Office of Commission Appellate
Adjudication*
Mail Stop: O-16C1
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Board
Panel
Adjudicatory File*
U.S. Nuclear Regulatory Commission
Mail Stop: O-16C1
Washington, DC 20555

Diane Curran, Esq. **
Harmon, Curran, Spielberg
& Eisenberg, L.L.P.
1726 M Street, N.W., Suite 600
Washington, DC 20036
(E-mail: dcurran@harmoncurran.com)

Lisa F. Vaughn, Esq. **
Legal Department
Mail Code - PB05E
Duke Energy Corporation
426 S. Church Street (EC11X)
Charlotte, NC 28201-1006
(E-mail: IfVaughn@duke-energy.com)

David A. Repka, Esq. **
Anne W. Cottingham, Esq. **
Mark Wetterhahn, Esq. **
Winston & Strawn LLP
1400 L Street, N.W.
Washington, D.C. 20005-3502
(E-mail: drepka@winston.com
acotting@winston.com)

/RA/

Antonio Fernández
Counsel for NRC Staff