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November 17, 1975

50 - 247

Carmine J. Clemente, Esq.
New York State Atomic Energy
Council
Department of Commerce
99 Washington Avenue
Albany, New York 12245

Dear John:

In accordance with 10 C.F.R. § 2.740b (1975),
I enclose Consolidated Edison's written interrogatories
to the New York State Atomic Energy Council.

Sincerely yours,

Harry H. Voigt

Enclosure

cc w/enc: John B. Farmakides, Esq.
Dr. John H. Buck
Dr. Lawrence R. Quarles
Atomic Safety and Licensing Appeal
Panel
Joseph Gallo, Esq.
Hon. George V. Begany
Hendrick Hudson Free Library
David S. Fleischaker, Esq.
Secretary, USNRC (21)

Att

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)	
)	
CONSOLIDATED EDISON COMPANY)	Docket Nos. 50-3
OF NEW YORK, INC.)	50-247
(Indian Point Station,)	50-286
Units 1, 2 and 3))	
(Show Cause - Seismic))	

CON EDISON'S WRITTEN
INTERROGATORIES SUBMITTED
TO NEW YORK STATE
ATOMIC ENERGY COUNCIL

November 17, 1975

1. List each of the witnesses that you expect will present direct testimony on the issue of the Cape Ann earthquake as phrased in the Appeal Board's Prehearing Conference Order of October 17, 1975.

2. For each such witness, list his:

- a) educational background
- b) employment experience
- c) all publications authored or co-authored
- d) instances in which the witness has testified earlier on this or a closely related issue.

3. State for each such witness the tectonic province, including the boundaries thereof, in which he will contend the Indian Point site should be located.

4. State for each such witness the basis for his opinion on the issue referred to in question 3, supra.

5. For the tectonic province identified in question 3, supra, list all earthquakes contended to have had an intensity of IV or greater on the Modified Mercalli Scale, including for each:

- a) the intensity
- b) the exact location
- c) year, month, day, hour, and minute of occurrence

- d) the author, title, date, and full citation of each published study, report, or other document referring to each earthquake relied upon to support such contention.

6. For each witness listed in response to question 1, list all tectonic provinces contiguous with that identified in question 3, supra, and

- a) Define the boundaries for each such contiguous tectonic province.
- b) List for such contiguous province the greatest earthquake of historical record.
- c) For each such earthquake, state:
 - i) the intensity
 - ii) the exact location
 - iii) year, month, day, hour, and minute of occurrence
 - iv) the author, title, date, and full citation of each published study, report, or other document referring to each earthquake.

7. List each of the witnesses that you expect will present direct testimony on the issue of the correct ground acceleration value produced by the Safe Shutdown Earthquake for Units 2 and 3 at the Indian Point site.

8. For each such witness, list his:

- a) educational background
- b) employment experience
- c) all publications authored or co-authored
- d) instances in which the witness has testified earlier on this or a closely related issue.

9. State separately for each such witness his contention concerning the correct set of intensity v. acceleration data that should be used to compute the ground acceleration value for the Indian Point site.

10. List each of the witnesses that you expect will present direct testimony on the issue of the capability of the Ramapo Fault as phrased in the Appeal Board's Prehearing Conference Order of October 17, 1975.

11. For each such witness, list his:

- a) educational background
- b) employment experience
- c) all publications authored or co-authored
- d) instances in which the witness has testified earlier on this or a closely related issue.

12. For each such witness, list by witness all treatises, articles, references, books, maps and other publications

that he will rely upon in preparing his direct testimony on the issue of the capability of the Ramapo Fault.

13. List for each such witness any field work done on the issue of the capability of the Ramapo Fault that he will rely upon in preparing his direct testimony, including:

- a) the duration of the field work
- b) the location
- c) the general description and objectives
- d) the person in charge of such field work.

14. Will the direct testimony of any witness on the issue of the capability of the Ramapo Fault include any earthquake not included on Figures (Tables) 1 and 2 of the Statement: Geological Survey - New York State Museum and Science Service regarding Licensing of Indian Point Reactor #3 and Discussion of the Final Safety Analysis Report Sections 2.7 (Geology) and 2.8 (Seismology)?

15. If so, for each such earthquake list:

- a) the year, month, day, hour, and minute of occurrence
- b) the exact location
- c) the depth
- d) the intensity

- e) the author, title, date, and full citation of each published study, report, or other document referring to each such earthquake relied upon to support such contention.

16. Is it your contention that the Ramapo Fault has exhibited movement at or near the ground surface at least once within the past 35,000 years?

17. If so, identify:

- a) the year, month, day, hour, and minute at which each such movement occurred
- b) the exact location of each such movement
- c) the depth of each such movement
- d) the precise nature and extent of each such movement
- e) the author, title, date, and full citation of each published study, report, or other document referring to each such movement relied upon to support such contention.

18. Is it your contention that the Ramapo Fault has exhibited movement of a recurring nature within the past 500,000 years?

19. If so, identify:

- a) the geologic time span of this movement
- b) the exact location of each such movement
- c) the depth of such movement
- d) the precise nature and extent of each such movement
- e) the author, title, date, and full citation of each published study, report or other document referring to each such movement relied upon to support such contention.

20. Is it your contention that the Ramapo Fault has exhibited macro-seismicity instrumentally determined with records of sufficient precision to demonstrate a direct relationship with the fault?

21. If so, state:

- a) your contention as to the minimum intensity earthquake constituting a macro-event
- b) the exact location of each such event which you contend exhibits a direct relationship with the fault

- c) the intensity of each such event
- d) the location, type, and operators of the instruments fixing the location of each such event
- e) the depth of each event
- f) the year, month, day, and hour of each such event
- g) the author, title, date, and full citation of each published study, report, or other document referring to each such event relied upon to support such contention.

22. Is it your contention that the Ramapo Fault exhibits a structural relationship to a capable fault as defined in 10 C.F.R. Part 100, App. A, III(g)(1) and (2) such that movement on this fault could be reasonably expected to be accompanied by movement on the Ramapo Fault?

23. If so, identify for that capable fault:

- a) its name
- b) its exact location
- c) its trend
- d) its length
- e) the identity of its discoverer

- f) the author, title, date and full citation of each published study, report, or other document referring to that fault relied upon to support such contention.

24. Identify for each capable fault referred to in questions 22 and 23, supra, that definition of capability contained in 10 C.F.R. Part 100, App. A, III(g)(1) or (2) relied on to establish capability.

25. Define the structural relationship that exists between the Ramapo Fault and that fault referred to in questions 22 and 23, supra.


Patrick K. O'Hare

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Attorneys for Consolidated Edison
Company of New York, Inc.

November 17, 1975

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
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CONSOLIDATED EDISON COMPANY)	Docket Nos. 50-3
OF NEW YORK, INC.)	50-247
(Indian Point Station Units)	50-286
1, 2, and 3))	
(Show Cause - Seismic))	

CERTIFICATE OF SERVICE

I hereby certify that I have this 17th day of November, 1975, served the following document entitled "Con Edison's Written Interrogatories Submitted to New York State Atomic Energy Council" dated November 17, 1975 by mailing a copy thereof, first class postage prepaid and properly addressed to the persons listed below:

John B. Farmakides, Esq.
Chairman, Atomic Safety and
Licensing Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D. C. 20555

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Secretary
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Commission
Washington, D. C. 20555
Attention: Chief, Docketing
and Service Section


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