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9/14/79

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

9/14/79

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
FLORIDA POWER AND LIGHT COMPANY  
(Turkey Point Nuclear Generating  
Unit Nos. 3 and 4)

)  
) Docket Nos. ~~50-250~~  
) 50-251  
) (Proposed Amendments to Facility  
) Operating Licenses to Permit  
) Steam Generator Repair)

NRC STAFF INTERROGATORIES TO, AND REQUEST  
FOR THE PRODUCTION OF DOCUMENTS FROM,  
INTERVENOR MARK P. ONCAVAGE

The Nuclear Regulatory Commission (NRC) Staff hereby requests that Intervenor Mark P. Oncavage (Intervenor), pursuant to 10 CFR §2.740(b), answer separately and fully, in writing under oath or affirmation, the following interrogatories within 14 days after service hereof.

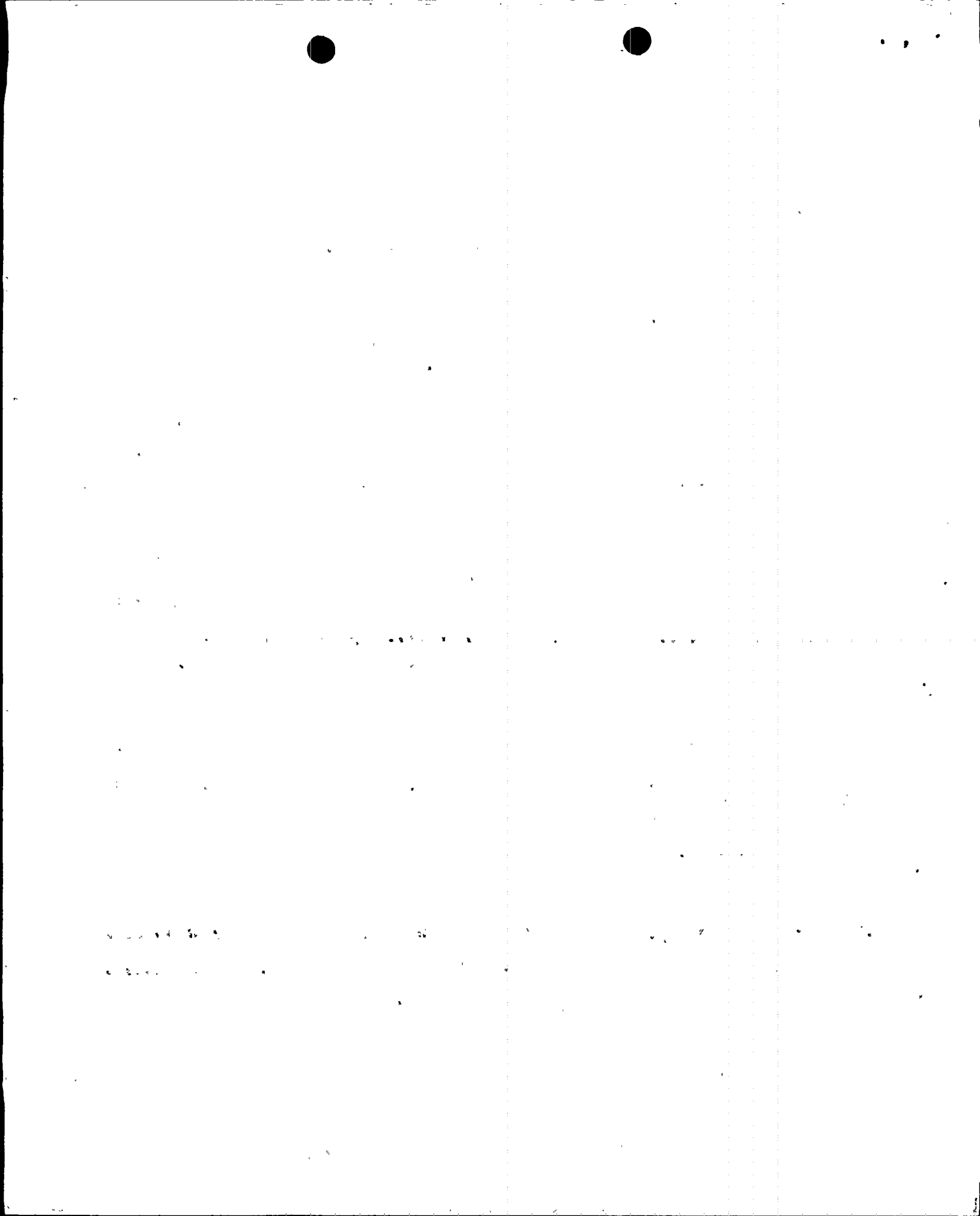
For each response to the interrogatories listed below, identify the person or persons who prepared, or substantially contributed to the preparation of, the response.

The interrogatories attached are to be considered the Intervenor's continuing obligation. Accordingly, if, after he has answered these interrogatories, additional information comes to his attention with respect to one or more of the answers, the answers should be amended in a timely manner to provide such additional information.

The NRC Staff further requests that the Intervenor, pursuant to 10 CFR §2.741, provide copies of, or make available for Staff inspection and copying, the documents designated by him in response to certain of the accompanying interrogatories within 30 days after service thereof.

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Contention 1

1-1 a. State whether you intend to call any person or persons as witnesses in this proceeding in support of Contention 1.

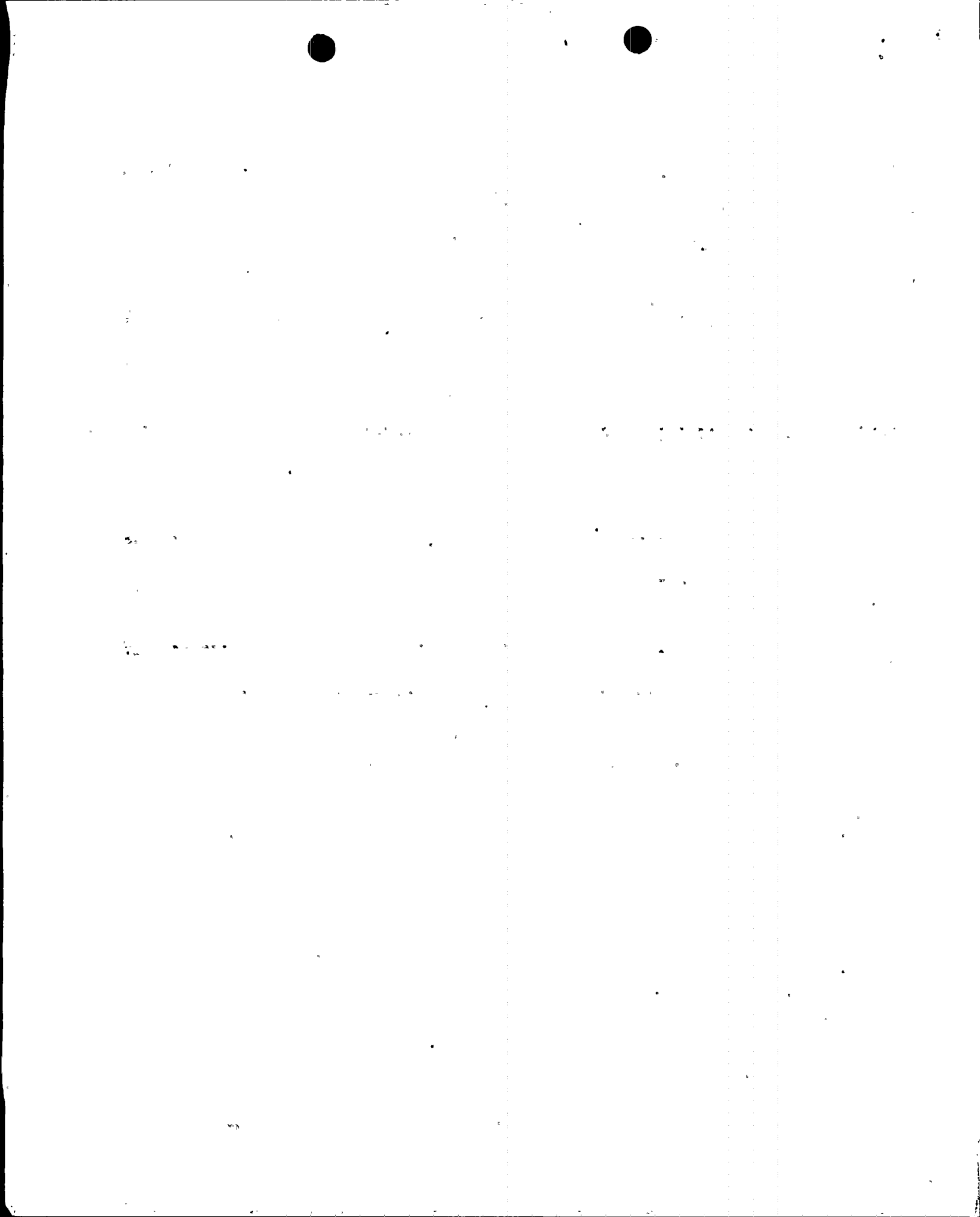
b. Provide the names, addresses, educational background, and professional qualifications of any persons named above.

1-2 Provide summaries of the views, positions, or proposed testimony on contention 1 of all persons named in response to Interrogatory No. 1-1 that you intend to present during this proceeding.

1-3 Identify by author, title, date of publication and publisher, all books, documents, and papers that you intend to employ or rely upon in presenting your direct case on Contention 1 and provide copies of, or make available for Staff inspection and copying, these items.

1-4 Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with Contention 1.

1-5 If the representations made in Contention 1 are based in whole or in part on any documents prepared by the Applicant or NRC Staff which you contend are deficient, specify which documents, and the particular portions thereof, you regard as deficient and explain why they are deficient.



- 1-6 What specific requirements of NEPA does Intervenor suggest in contention 1 require preparation of an environmental impact statement (EIS) in the instant action?
- 1-7 What specific requirements of 10 CFR Part 50 does Intervenor suggest require preparation of an EIS?
- 1-8 What specific requirements of 10 CFR Part 51 does Intervenor suggest require preparation of an EIS?
- 1-9 What does the phrase "with particular reference to 10 CFR 50.90" mean as utilized in Contention 1?
- 1-10 Does Intervenor contend that an EIS must be prepared in this action. If so, please articulate the factual bases for such contention.
- 1-11 Explain the meaning of subpart (a) to Contention 1.



1. The first part of the document  
 discusses the general principles of  
 the system. It covers the basic  
 concepts and the overall structure.

2. The second part of the document  
 describes the implementation details.  
 It provides a detailed overview of  
 the system's architecture and the  
 various components involved.

3. The third part of the document  
 discusses the performance and  
 efficiency of the system. It  
 compares the system's performance  
 against other similar systems.

4. The fourth part of the document  
 discusses the security and  
 privacy aspects of the system. It  
 outlines the measures taken to  
 protect the system from external  
 threats.

5. The fifth part of the document  
 discusses the future work and  
 the challenges ahead. It identifies  
 the areas that need further  
 research and development.

6. The sixth part of the document  
 discusses the conclusion and  
 the overall findings of the study.  
 It summarizes the key points and  
 provides a final assessment of the  
 system.

7. The seventh part of the document  
 discusses the references and  
 the sources used in the study.  
 It lists the books, articles, and  
 other documents that were consulted.

8. The eighth part of the document  
 discusses the appendix and the  
 additional information. It provides  
 a detailed overview of the system's  
 components and their interactions.

9. The ninth part of the document  
 discusses the bibliography and the  
 sources used in the study. It lists  
 the books, articles, and other  
 documents that were consulted.

10. The tenth part of the document  
 discusses the index and the  
 location of the various sections.  
 It provides a detailed overview of  
 the system's components and their  
 interactions.

11. The eleventh part of the document  
 discusses the glossary and the  
 definitions of the various terms.  
 It provides a detailed overview of  
 the system's components and their  
 interactions.

12. The twelfth part of the document  
 discusses the acknowledgments and  
 the people who helped in the study.  
 It provides a detailed overview of  
 the system's components and their  
 interactions.

13. The thirteenth part of the document  
 discusses the disclaimer and the  
 limitations of the study. It provides  
 a detailed overview of the system's  
 components and their interactions.

14. The fourteenth part of the document  
 discusses the copyright and the  
 permissions. It provides a detailed  
 overview of the system's components  
 and their interactions.

15. The fifteenth part of the document  
 discusses the contact information and  
 the ways to reach the author. It  
 provides a detailed overview of the  
 system's components and their  
 interactions.

16. The sixteenth part of the document  
 discusses the table of contents and  
 the location of the various sections.  
 It provides a detailed overview of  
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17. The seventeenth part of the document  
 discusses the list of figures and  
 the location of the various figures.  
 It provides a detailed overview of  
 the system's components and their  
 interactions.

18. The eighteenth part of the document  
 discusses the list of tables and  
 the location of the various tables.  
 It provides a detailed overview of  
 the system's components and their  
 interactions.

Contention 2

2-1 a. State whether you intend to call any person or persons as witnesses in this proceeding in support of Contention 2.

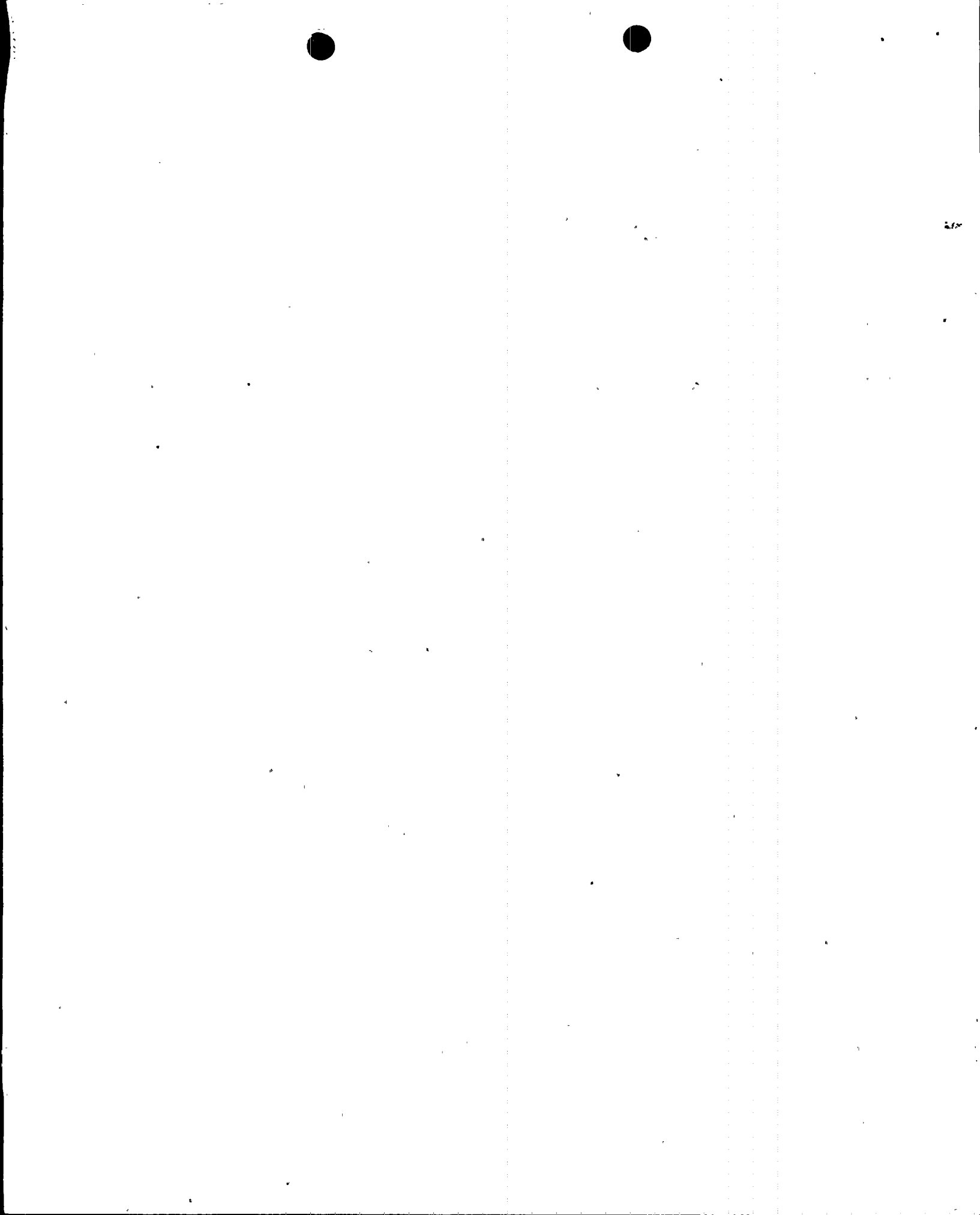
b. Provide the names, addresses, educational background, and professional qualifications of any persons named above.

2-2 Provide summaries of the views, positions, or proposed testimony on Contention 2 of all persons named in response to Interrogatory No. 2-1 that you intend to present during this proceeding.

2-3 Identify by author, title, date of publication and publisher, all books, documents, and papers that you intend to employ or rely upon in presenting your direct case on Contention 2 and provide copies of, or make available copies of, for Staff inspection and copying, these items.

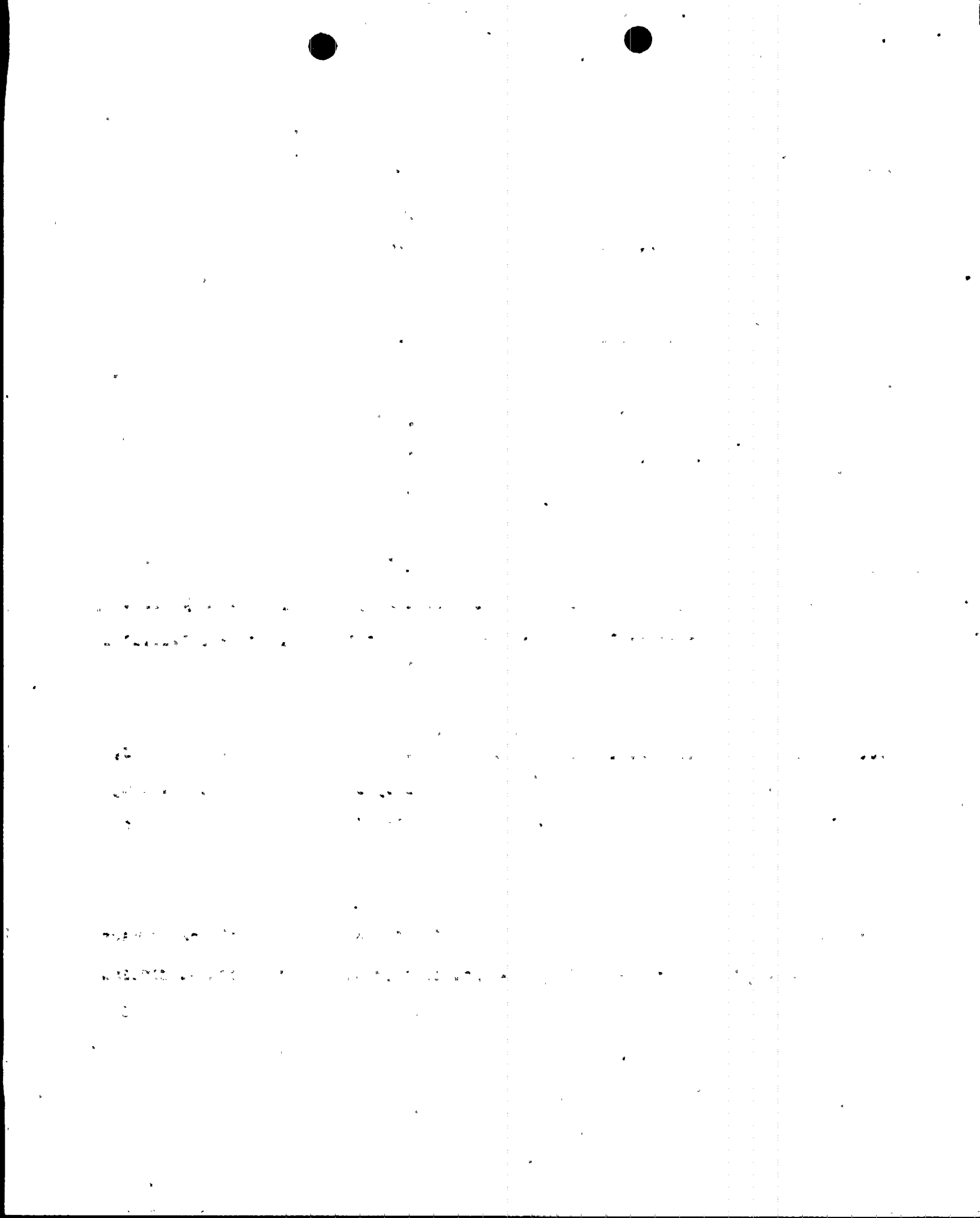
2-4 Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with Contention 2.

2-5 If the representations made in Contention 2 are based in whole or in part on any documents prepared by the Applicant or NRC Staff which you contend are deficient, specify which documents, and the particular portions thereof, you regard as deficient and explain why they are deficient.





- 2-6 What specific provisions of 10 CFR Part 20 are alluded to in Contention 2?
- 2-7 What specific provisions of NEPA are alluded to in Contention 2?
- 2-8 What specific provisions of the FWPCA are alluded to in Contention 2?
- 2-9 Does Intervenor contend that the proposed "repairs" will not comply with the above-referenced provisions? If so, please articulate the precise activities complained of and the bases for such contention.



Contention 3

3-1 a. State whether you intend to call any person or persons as witnesses in this proceeding in support of Contention 3.

b. Provide the names, addresses, educational background, and professional qualifications of any persons named above.

3-2 Provide summaries of the views, positions, or proposed testimony on Contention 3 of all persons named in response to Interrogatory No. 3-1, that you intend to present during this proceeding.

3-3 Identify by author, title, date of publication and publisher, all books, documents, and papers that you intend to employ or rely upon in presenting your direct case on Contention 3 and provide copies of, or make available for Staff inspection and copying, these items.

3-4 Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with Contention 3.

3-5 If the representations made in Contention 3 are based in whole or in part on any documents prepared by the Applicant or NRC Staff which you contend are deficient, specify which documents, and the particular portions thereof, you regard as deficient and explain why they are deficient.



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3-6 What specific requirements of 10 CFR Part 20 are alluded to in Contention 3?

3-7 What specific requirements of 10 CFR Part 50 are alluded to in Contention 3?

3-8 What specific requirements of 10 CFR Part 51 are alluded to in Contention 3?

3-9 What specific requirements of 10 CFR Part 100 are alluded to in Contention 3?

3-10 What specific requirements of NEPA are alluded to in Contention 3?

3-11 What specific requirements of FWPCA are alluded to in Contention 3?

3-12 Specify what "handling, processing, storing or discharging of primary coolant" is alluded to in Contention 3.

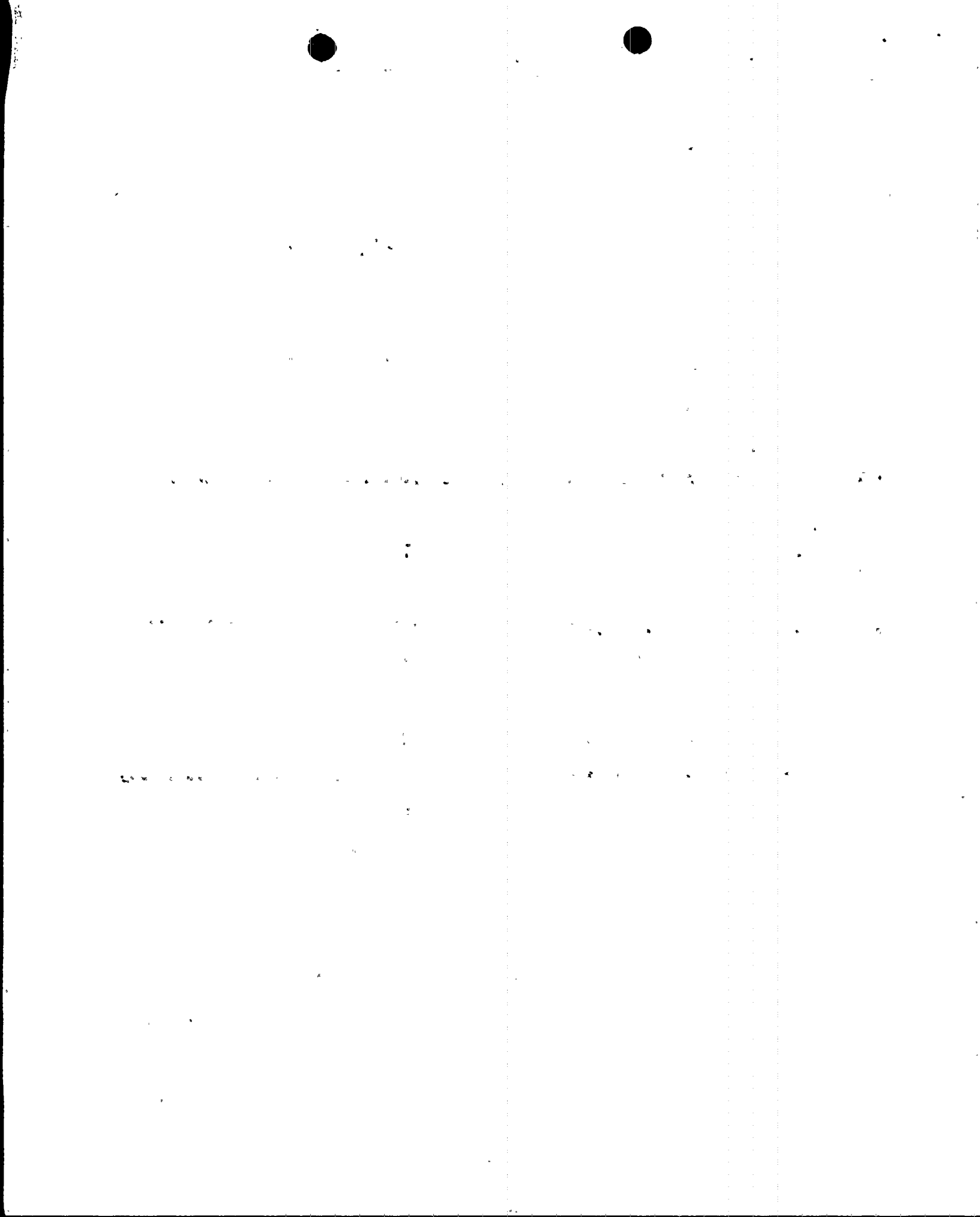
3-13 Does Intervenor contend that the "handling, processing, storing or discharging of primary coolant", as explained in response to interrogatory 3-12, will not conform to the several provisions specified in response to interrogatories 3-7 through 3-11 above? If so, please articulate the bases for such contention.



*[The text in this section is extremely faint and illegible. It appears to be a list or table of data, possibly organized into columns. Some faint characters and numbers are visible, but they cannot be transcribed accurately.]*

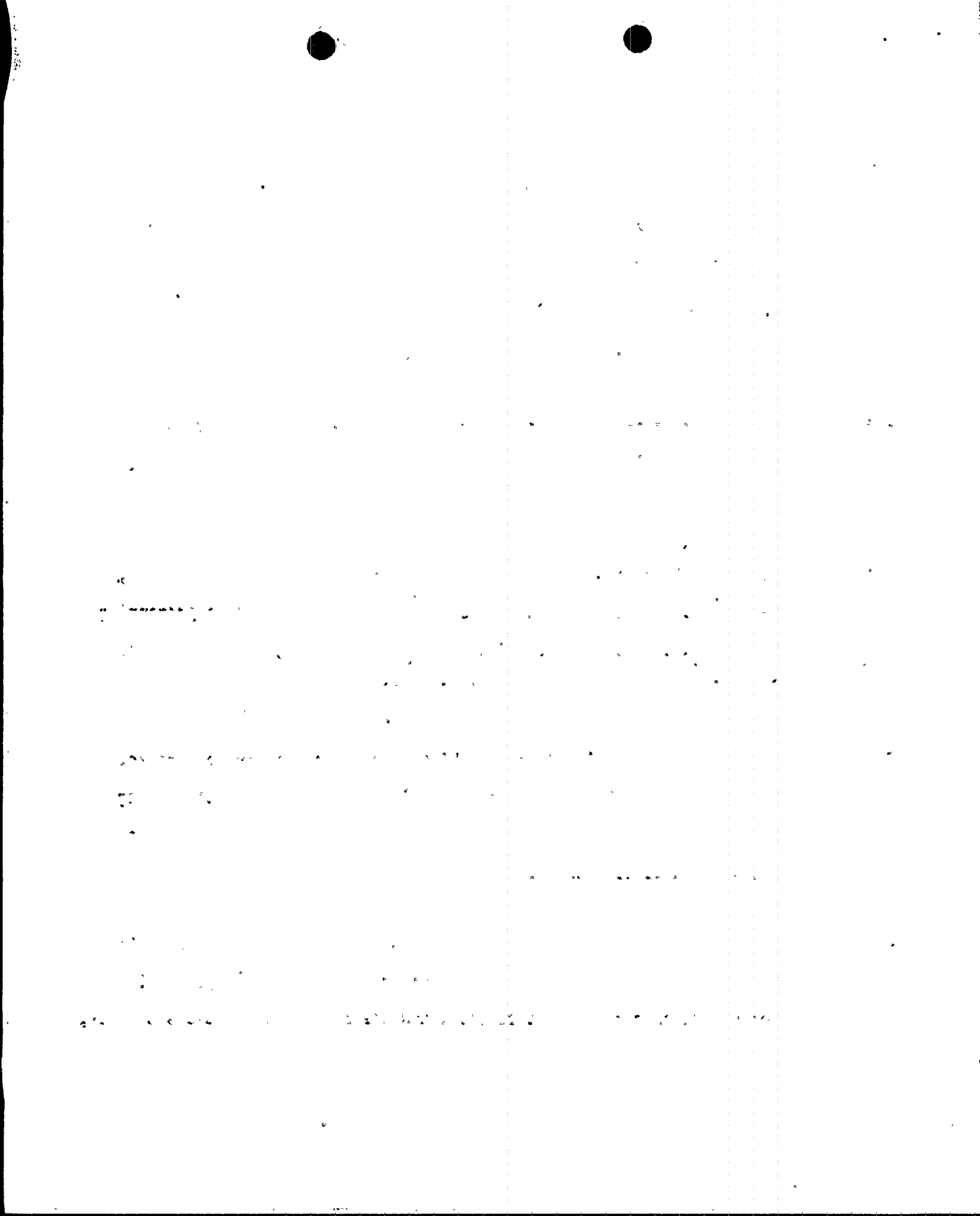
Contention 4

- 4-1 a. State whether you intend to call any person or persons as witnesses in this proceeding in support of Contention 4.
- b. Provide the names, addresses, educational background, and professional qualifications of any persons named above.
- 4-2 Provide summaries of the views, positions, or proposed testimony on Contention 4 of all persons named in response in Interrogatory No. 4-1 that you intend to present during this proceeding.
- 4-3 Identify by author, title, date of publication and publisher, all books, documents, and papers that you intend to employ or rely upon in presenting your direct case on Contention 4 and provide copies of, or make available for Staff inspection and copying, these items.
- 4-4 Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with Contention 4.
- 4-5 If the representations made in Contentions 4 are based in whole or in part on any documents prepared by the Applicant or NRC Staff which you contend are deficient, specify which documents, and the particular portions thereof, you regard as deficient and explain why they are deficient.





- 4-6 What specific requirements of 10 CFR Part 20 are alluded to in Contention 4?
- 4-7 What specific requirements of 10 CFR Part 50 are alluded to in Contention 4?
- 4-8 What specific requirements of 10 CFR Part 51 are alluded to in Contention 4?
- 4-9 What specific requirements of NEPA are alluded to in Contention 4?
- 4-10 What specific requirements of FWPCA are alluded to in Contention 4?
- 4-11 Specify what "discharge of untreated laundry waste water" is alluded to in Contention 4 and the perceived source thereof?
- 4-12 Does Intervenor contend that the "discharge of untreated laundry waste water", as explained in response to interrogatory 4-11, will not comply with the several provisions specified in response to interrogatories 4-7 through 4-10 above? If so, please articulate the bases for such contention.



Contention 5

5-1 a. State whether you intend to call any person or persons as witnesses in this proceeding in support of Contention 5.

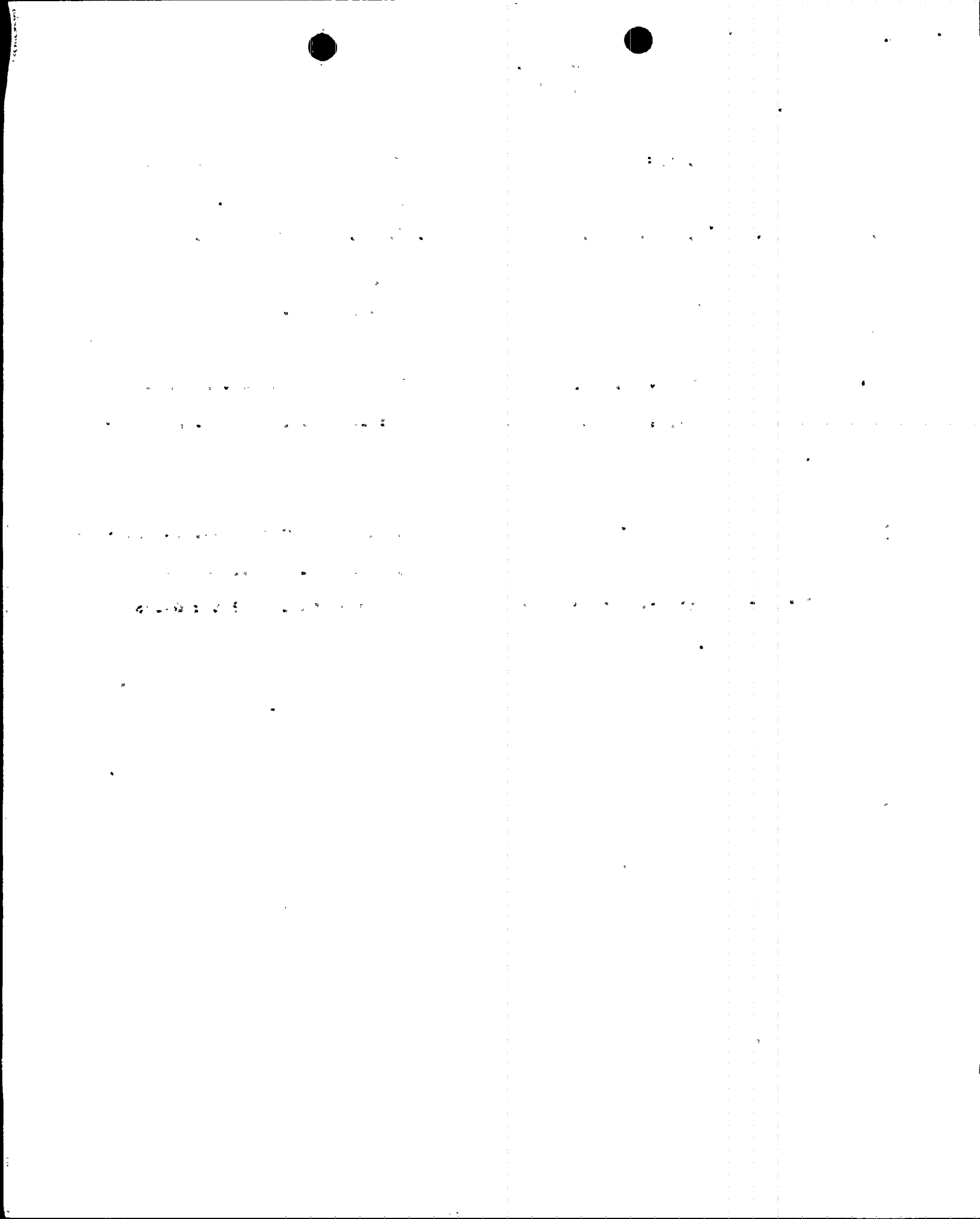
b. Provide the names, addresses, educational background, and professional qualifications of any persons named above.

5-2 Provide summaries of the views, positions, or proposed testimony on Contention 5 of all persons named in response to Interrogatory No. 5-1 that you intend to present during this proceeding.

5-3 Identify by author, title, date of publication and publisher, all books, documents, and papers that you intend to employ or rely upon in presenting your direct case on Contention 5 and provide copies of, or make available for Staff inspection and copying, these items.

5-4 Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with Contention 5.

5-5 If the representations made in Contention 5 are based in whole or in part on any documents prepared by the Applicant or NRC Staff which you contend are deficient, specify which documents, and the particular portions thereof you regard as deficient and explain why they are deficient.



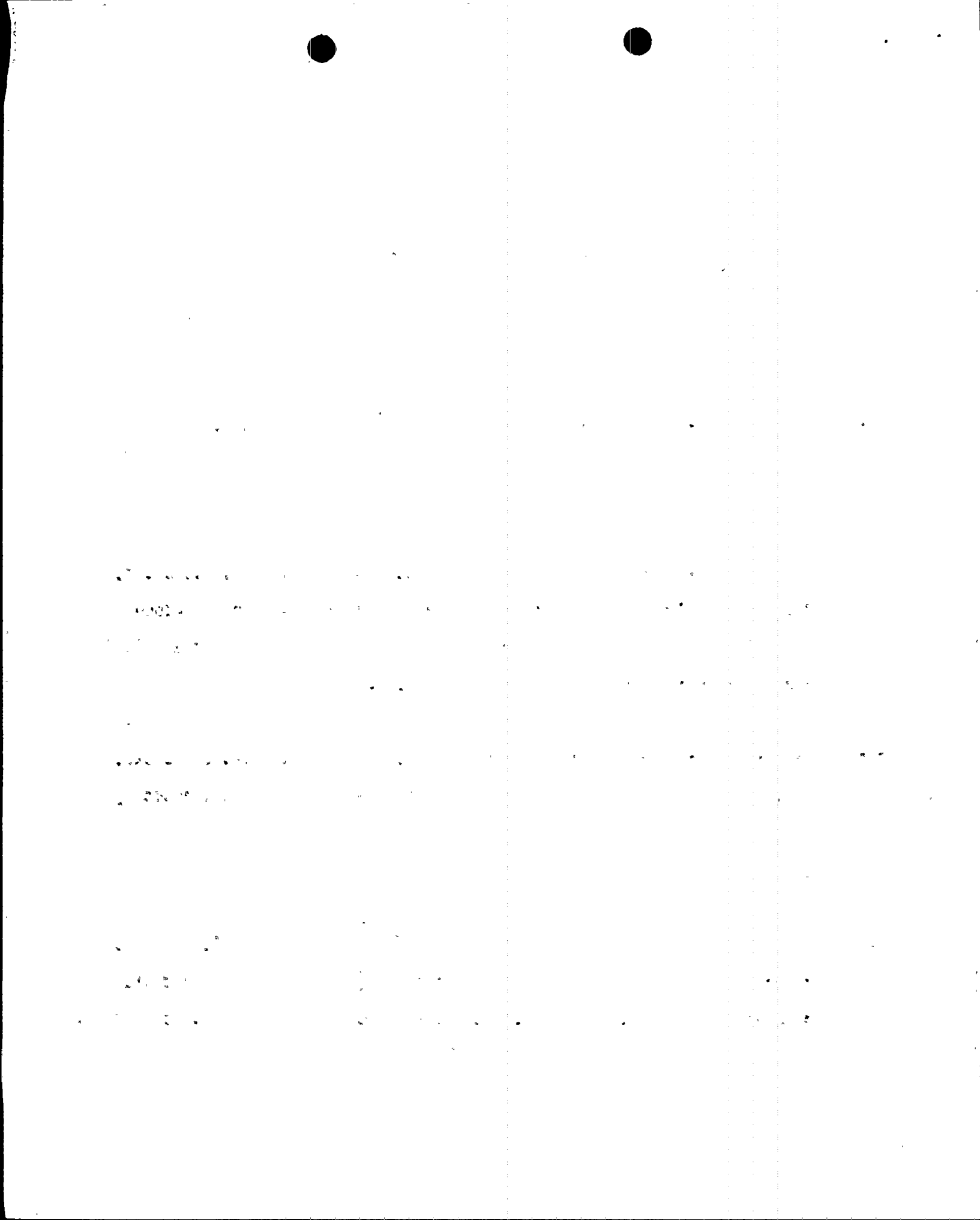
5-6 What specific requirements of 10 CFR Part 20 are alluded to in Contention 5?

5-7 What specific requirements of 10 CFR Part 51 are alluded to in Contention 5?

5-8 What specific requirements of NEPA are alluded to in Contention 5?

5-9 What is the basis for the supposition in Contention 5 that transient workers with unknown radiation histories will be utilized in the proposed action?

5-10 Does Intervenor contend that the postulated utilization of transient workers will not comply with the several provisions specified in response to interrogatories 5-6 through 5-8? If so, please articulate the bases for such contention.



Contention 6

6-1 a. State whether you intend to call any person or persons as witnesses, in this proceeding in support of Contention 6.

b. Provide the names, addresses, educational background, and professional qualifications of any persons named above.

6-2 Provide summaries of the views, positions, or proposed testimony on Contention 6 of all persons named in response to Interrogatory No. 6-1 that you intend to present during this proceeding.

6-3 Identify by author, title, date of publication and publisher, all books, documents, and papers that you intend to employ or rely upon in presenting your direct case on Contention 6 and provide copies of, or make available for Staff inspection and copying, these items.

6-4 Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with Contention 6.

6-5 If the representations made in Contention 6 are based in whole or in part on any documents prepared by the Applicant or NRC Staff which you contend are deficient, specify which documents, and the particular portions thereof you regard as deficient and explain why they are deficient.



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6-6 What specific requirements of 10 CFR Part 50 alluded to in Contention 6?

6-7 What specific requirements of 10 CFR Part 51 alluded to in Contention 6?

6-8 What specific requirements of NEPA are alluded to in Contention 6?

6-9 What specific requirements of FWPCA are alluded to in Contention 6?

6-10 What specific "laws protecting Biscayne Bay [etc.]" are alluded to in Contention 6?

6-11 What is the basis for the supposition that the proposed action will lead to the creation of a "long-term nuclear waste storage facility" as that phrase is used in Contention 6?

6-12 What "particular attention" does Intervenor assert in Contention 6 should be drawn to the "proposed floorless steam generator disposal building"?

6-13 Does Intervenor contend that the postulated "waste storage facility" and/or "steam generator disposal facility" will not comply with the several provisions specified in response to interrogatories 6-7 through 6-10. If so, please articulate the bases for such contention.

Respectfully submitted,

*Steven C. Goldberg*

Steven C. Goldberg  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 14th day of September, 1979.



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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

FLORIDA POWER AND LIGHT COMPANY )

(Turkey Point Nuclear Generating )  
Unit Nos. 3 and 4 )

) Docket Nos. 50-250  
) 50-251

) (Proposed Amendments to Facility Operating License to Permit  
) Operating Licenses to Permit Steam Generator Repair)

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, INTERVENOR MARK P. ONCAVAGE" 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, through deposit in the Nuclear Regulatory Commission's internal mail system, this 14th day of September, 1979:

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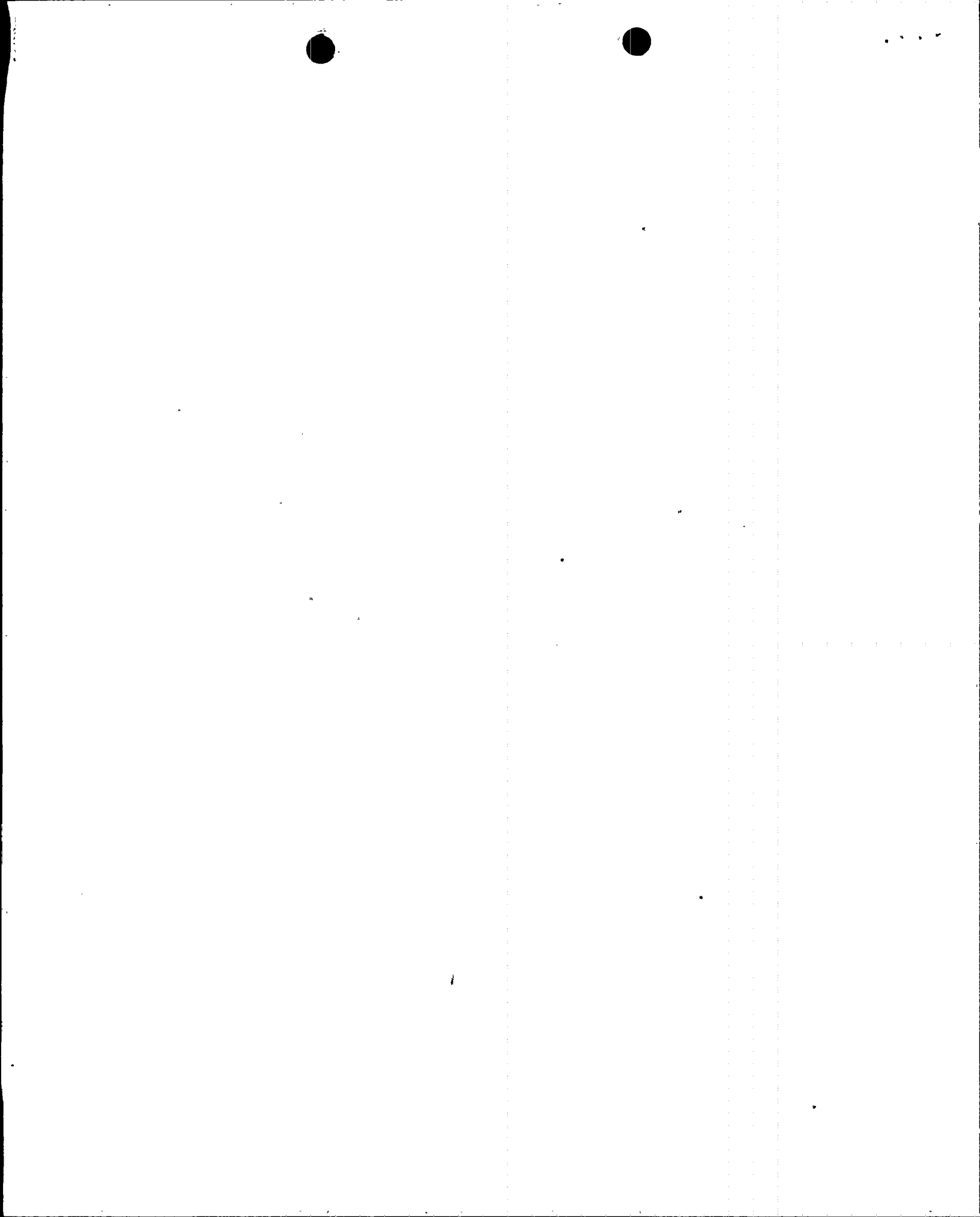
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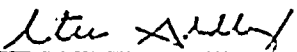
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