

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of :
CINCINNATI GAS & ELECTRIC CO, ET AL. : DOCKET NO. 50-358
(William H. Zimmer Nuclear Station) :

INTERVENOR MIAMI VALLEY POWER PROJECT'S
FIRST SET OF INTERROGATORIES TO NRC STAFF

Intervenor Miami Valley Power Project (MVPP) hereby propounds the following interrogatories to NRC Staff to be answered fully in writing under oath, within fourteen (14) days after service hereof in accordance with the following instructions:

1. "Describe in detail" shall mean give all data, calculations and assumptions used in formulating the answer.
2. These interrogatories request all knowledge or information in the possession of NRC Staff and/or NRC Staff's agents, representatives, and unless privileged, attorneys.

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1. Have fires ever occurred within cable trays at any nuclear power plant which has ever operated in the United States?

2. If the answer to interrogatory 1 is in the affirmative, identify each such occurrence by plant and date. Attach to your answers investigation reports of each of these fires.

3. What precautions have been taken at ZPS-1 to insure that similar fires will not occur there?

4. With regard to each fire identify in your answer to interrogatory 2, describe how the fire protection at ZPS-1 differs from that at the plant in question.

5. Was James Creswell, an NRC inspector, ever involved in any inspections of Zimmer cable tray fire insulation? If so, describe in detail the results of his inspections and provide all relevant documents.

Respectfully submitted,



Leah Kosik
Attorney for MVPP

August 24, 1979

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