

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
INTERROGATORIES TO APPLICANT REGARDING
CONTENTION 17

Intervenor Miami Valley Power Project (MVPP) hereby propounds the following interrogatories to Applicant 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 Applicant and/or Applicant's agents, representatives, and unless priveleged, attorneys.



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1. At the Zimmer Nuclear Power Station (hereinafter "ZPS-1"), how many layers of Kaowool, and what thickness of Kaowool, cover the cable trays. If the number of layers and thickness varies, list every combination of thickness and number of layers of Kaowool used to cover the cable trays at ZPS-1.
2. At ZPS-1, what is the average percent fill of EPR insulated, Hypalon jacketed control cables?
3. At ZPS-1, what is the minimum and maximum fill of EPR insulated, Hypalon jacketed control cables?
4. Once they are energized, will any of the cables at ZPS-1 produce heat?
5. If the answer to the previous interrogatory is in the affirmative, describe in detail the maximum amount of heat which will, under normal operating conditions, be generated by cables at ZPS-1.
6. If the answer to interrogatory 4 is in the affirmative, describe in detail the maximum amount of heat which can be produced under any conceivable set of circumstances by cables at ZPS-1.
7. How were the conditions described in your answers to interrogatories 5 and 6 taken into consideration in tests regarding the fire safety of cable trays at ZPS-1?

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8. Describe in detail the contact that flames had with Kaowool in each fire protection test regarding the cable trays at ZPS-1. In answering this interrogatory, indicate whether the flames surrounded, had some contact with, or had no contact with the Kaowool.

9. How did the sealing of the cable trays as described on page 9 of the report submitted by Construction Technology Laboratories on their Fire Protective Cable Tray Fire Test which concerned ZPS-1 differ from the manner in which cable trays are actually sealed at the ZPS-1 site?

10. During any of the fire testing of cable trays for ZPS-1, were any of the cable tray supports located outside of the fire zone? If so, describe in detail the construction and location of each such support with regard to the fire zone.

11. Identify all studies which concern the flow of heated air within the cable trays at ZPS-1. Attach copies of such studies to your answers to these interrogatories.

12. Identify the location and use of all cables which do not meet IEEE 383 specifications.

13. Were any cables of the type described in your answer to interrogatory 12 used in any fire protection test regarding the cable trays at ZPS-1?

14. If the answer to interrogatory 13 is in the negative, explain why they were not so tested.

15. Identify and attach to your answer to these interrogatories copies of all studies which concern the manner in which Kaowool affects the build-up of heat in cable trays.

16. Supply the manufacturer's specifications for every type of cable which is channeled through a cable tray at ZPS-1.

Respectfully submitted

August 24, 1979



Leah Kosik
Attorney for MVPP

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CERTIFICATE OF SERVICE

I hereby certify that copies of the following have been sent to all parties on the service list by ordinary U.S. mail on the 24th day of August, 1979:

1. Confirmation of witness, Robert Hofstadter.
2. Miami Valley Power Project's Motion For Evening Hearings.
3. Miami Valley Power Project's Motion To Reopen Discovery For Contention 13.
4. Miami Valley Power Project's Motion For Full Disclosure.
5. Intervenor Miami Valley Power Project's First Set of Interrogatories To NRC Staff.
6. Intervenor Miami Valley Power Project's Interrogatories To Applicant Regarding Contention 17.

August 24, 1979



Leah Kosik
Attorney for MVPP

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