



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
PORTLAND GENERAL ELECTRIC COMPANY,	)	Docket No. 50-344
<u>ET AL.</u>	)	(Control Building)
	)	
(Trojan Nuclear Plant)	)	

NRC STAFF INTERROGATORIES TO, AND REQUEST FOR  
THE PRODUCTION OF DOCUMENTS FROM, THE STATE OF  
OREGON ON CONTROL BUILDING MODIFICATIONS

The Nuclear Regulatory Commission (NRC) Staff hereby requests that the State of Oregon, pursuant to 10 CFR § 2.740b, 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 NRC Staff further requests that the State of Oregon, pursuant to 10 CFR § 2.741, provide copies of, or make available for Staff inspection and copying, any documents designated by the State of Oregon in response to certain of the accompanying interrogatories within 30 days after service thereof.

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G-1. State whether or not you intend to call any person or persons as witnesses in this proceeding to testify with regard to

(a) the contentions which were admitted by the Licensing Board in its Prehearing Conference Order of April 12, 1979

(b) the general issued in Phase II of this proceeding with regard to the scope and timeliness of the modifications required by the NRC Order of May 26, 1978,

and provide the names, addresses, educational background, and professional qualifications of those persons you intend to call.

G-2. Indicate whether those persons identified in response to Interrogatory No. G-1 (a) and (b) will appear voluntarily or under subpoena.

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

(a) each admitted contention as to which you will present testimony

(b) the general issue as to the scope and timeliness of the modifications required by the NRC Order of May 26, 1978.

G-4. 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

(a) those admitted contentions as to which you will present testimony

(b) the general issue as to the scope and timeliness of the modifications, if you intend to present a direct case on this matter,

and provide copies of, or make available for Staff inspection and copying, these items.

G-5. If the views, positions or summary of proposed testimony set forth in response to Interrogatory G-3 are based in whole or in part on any documents prepared by the Licensee 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.

G-6. (a) Have you undertaken or do you intend to undertake any analysis, evaluation, study or review of the proposed modifications either in preparation for the hearing in Phase II of this proceeding or in connection with the State of Oregon's own regulation of the Trojan facility?

- (b) If the answer to (a) is "yes," please
- (i) identify the person or persons who are engaged in such analysis, evaluation, study or review and give their professional qualifications
  - (ii) describe the nature and extent of the analysis, evaluation, study or review (e.g. what aspects of the modifications is it directed to; are independent calculations or tests being performed, does your investigation include inspections of the Trojan plant)
  - (iii) summarize the results of the analysis, evaluation, study or review to date and your position on the proposed modifications based on your work done to date
  - (iv) provide copies of any reports, documents or other written materials generated thusfar as a result of your analysis, evaluation, study or review of the modifications or make such items available for NFC Staff inspection and copying.

G-7. Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in con-

ducting your cross-examination of prospective NRC Staff witnesses  
testifying in connection with the proposed modifications.

Respectfully submitted,

*Joseph R. Gray*  
Joseph R. Gray  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 11th day of June, 1979

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NUCLEAR REGULATORY COMMISSION

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 ) (Control Building)  
(Trojan Nuclear Plant) )

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, THE STATE OF OREGON ON CONTROL BUILDING MODIFICATIONS" 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 11th day of June, 1979:

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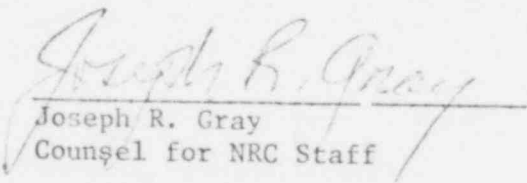
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