

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

STATE OF OREGON RESPONSES  
TO NRC STAFF INTERROGATORIES



Submitted By:

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Attorneys for State of Oregon

June 25, 1979.

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STATE OF OREGON RESPONSES  
TO NRC STAFF INTERROGATORIES

INTERROGATORY 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 (sic) 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."

RESPONSE TO INTERROGATORY G-1.

At this time, the State of Oregon believes that it will call at least one witness to testify in this proceeding. Depending on the information developed by the NRC Staff Safety Evaluation, the discovery process, and Oregon's investigations, additional witnesses may be called by Oregon. Because the information generated to date in the proceeding is incomplete, the scope of any testimony cannot be determined.

At this time, Oregon believes that it will call Professor Harold I. Laursen, 1520 NW 13th, Corvallis, Oregon, 97330.

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Professor Laursen's qualifications were presented during Phase I of this proceeding, and appear on pages 1 through 4 of his Direct Testimony.

INTERROGATORY G-2

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

RESPONSE TO INTERROGATORY G-2

Professor Laursen will appear voluntarily.

INTERROGATORY G-3

"Provide summaries of the views, positions, or proposed testimony of all persons named in response to Interrogatory 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."

RESPONSE TO INTERROGATORY G-3

This material will be provided when sufficient information is available on which to base Oregon's testimony.

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INTERROGATORY G-4.

"Identify by author, title, date of publication and publisher, all books, documents, and papers that you intend to 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."

RESPONSE TO INTERROGATORY G-4.

See Response to Interrogatory G-3, above.

INTERROGATORY 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."

RESPONSE TO INTERROGATORY G-5.

See Response to Interrogatory G-3, above.

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INTERROGATORY 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 NRC Staff inspection and copying."

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RESPONSE TO INTERROGATORY G-6.

See Response to Interrogatory G-3, above. At this time, Professor Laursen and the staff of the Oregon Department of Energy are reviewing the information provided to date by the NRC staff and the Licensee. As necessary, independent studies or evaluations by Oregon may be undertaken in the future.

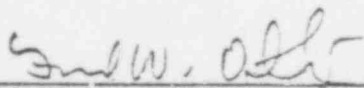
INTERROGATORY G-7.

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

RESPONSE TO INTERROGATORY G-7.

See Response to Interrogatory G-3, above.

Respectfully submitted,

  
\_\_\_\_\_  
FRANK W. OSTRANDER, JR.  
Assistant Attorney General  
Of Attorneys for State of Oregon

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

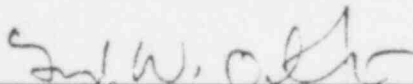
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 ) Docket No. 50-344  
PORTLAND GENERAL ELECTRIC )  
COMPANY, ET AL. ) (Control Building  
 ) Proceeding - Phase II)  
(Trojan Nuclear Plant) )

AFFIDAVIT OF FRANK W. OSTRANDER, JR.

STATE OF OREGON )  
 ) ss.  
County of Multnomah )

Frank W. Ostrander, Jr., being duly sworn, deposes and says that he is the Assistant Attorney General representing the State of Oregon, and that the answers contained in State of Oregon's Responses to NRC Interrogatories dated June 25, 1979 are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
FRANK W. OSTRANDER, JR.  
Assistant Attorney General

SUBSCRIBED AND SWORN TO before me this 25 day of  
June, 1979.

\_\_\_\_\_  
Notary Public for Oregon  
My Commission Expires: \_\_\_\_\_

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CERTIFICATE OF SERVICE

I, Frank W. Ostrander, Jr., hereby certify that on this 25 day of June, 1979, I served the within "State of Oregon Responses to NRC Interrogatories" upon the following parties of record by then depositing in the United States Post Office at Portland, Oregon, full, true, and correct copies thereof, addressed to the said parties of record at the following addresses listed below, and prepaying the postage thereon:

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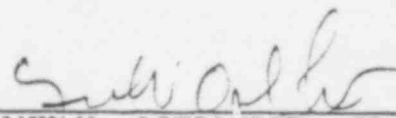
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