

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)	Docket Nos.	STN 50-488
DUKE POWER COMPANY)		STN 50-489
(Perkins Nuclear Station,)		STN 50-490
Units 1, 2 and 3))		

PRELIMINARY ANSWERS TO
INTERROGATORIES AND REQUESTS TO PRODUCE

NOW COME the Intervenors regarding the Interrogatories and Requests to Produce of the Applicant and do hereby state that the Intervenors have not had sufficient opportunity and time to fully respond to the Interrogatories and Requests to Produce and will supplement these Answers when such additional information and other matters become available. On account of the holidays and the shortness of time, the Intervenors have been unable to answer many aspects of these questions at this time and are still in the process of preparing on the basis of its own Interrogatories to Applicant as well as its own review of information which it has received from the Applicant to determine how it will proceed in the hearing which is set for January 29, 1979.

1. Intervenors understand that at least two of the issues are whether there are other obviously superior sites to the Perkins site for a nuclear station and whether the NRC Staff has adequately become informed and evaluated alternative sites. There may be other issues connected with these questions and

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there is certainly a generic issue which the Intervenor are in the process of studying at this time.

2. The preliminary indication of Intervenor's understanding of at least two of the issues is based upon the pleadings and briefs which were filed in the spring and summer of 1978 and the information which was filed in the summer and fall of 1978 by the Applicant and by the NRC Staff. As pointed out above, the Intervenor have not completed their research and analysis and therefore it may well be that other issues will emerge, or that the issues will be framed in a different way.

3. At this time it is the Intervenor's position that there are other superior sites to the Perkins site and that the NRC Staff has not done an adequate job of either informing itself or in evaluating and analyzing the alternative sites.

4. The Intervenor's basis for this has been set out in its filing of December 22nd to some extent and the Intervenor are now in the process of developing fully its evidence for the hearing on January 29, 1979, which will set out that basis for its position. The Intervenor are reviewing information obtained from the applicant and information in the file of this case, as well as other information in order to support its position.

5. In the answer to the previous questions, Intervenor mentioned the filing in this proceeding as well as information which it received from the Applicant which Intervenor believe will support Intervenor's position. The Intervenor are in the process of organizing this material and

cannot at this time list specifically which portions of this material it is relying on at the present time.

6. The Intervenors are now attempting to contact various experts and to obtain additional information in preparation to prefile testimony in regard to the hearing on January 29, 1979.

7. The Intervenors are in the process of attempting to contact experts and laymen throughout North Carolina in regard to the alternate site questions. Intervenors are making contacts with people at various schools, colleges and universities and at other institutions in attempt to obtain help and guidance on factual and analytical questions.

8. As of this time, the Intervenors have no knowledge that any documents have been prepared, research undertaken or studies conducted in regard to its attempts to obtain the help mentioned in the previous questions.

9. Yes. Intervenors intend to prefile testimony, present witnesses and exhibits and to cross-examine and otherwise fully participate in the hearing.

10. Yes. At this time, Intervenors do not know who will sponsor such testimony.

11. See answer to No. 10.

12. See answer to No. 10.

13. Yes. The Intervenors are in the process of preparing its information and analysis in regard to its position that sites obviously superior to the Perkins site exist for the construction and operation of a nuclear power plant similar to

Perkins. When this work is completed, Intervenors will file the results of this work.

14. Intervenors are now working on the basis for its conclusion; but as mentioned earlier, it has previously pointed out some of the relevant information which it has received and which it believes will be useful in basing such conclusions, and the sources of this information are set out in answers to previous Interrogatories.

15. The Intervenors are working on its evaluation and when it is completed they will give what they consider to be the most important criterion with respect to alternate site selection. Intervenors will also give the basis for such criterion selection.

16. When the Intervenors have completed their work they will also give other criteria which support their conclusions.

17. Intervenors have visited various sites, including but not limited to the Lake Norman sites. Certain representatives of the Intervenors have visited other sites and the Intervenors are now in the process of getting together all of its information of visited sites and will be furnishing this information as soon as it has obtained all of it.

18. Intervenors have always considered that the Perkins site is not a viable site. Therefore, many sites have always been obviously superior to the Perkins site which has always been considered by the Intervenors, and many other persons,

agencies, institutions and companies to be a defective and woefully inadequate site for a nuclear plant. The Intervenors are in the process of determining when other sites were considered specifically as viable alternatives. We will supplement this answer when such information is available.

19. Yes.

a. The Intervenors have not completed their analysis which will allow it to answer in a full and complete way a - e of this question, but will do so shortly in a complete manner.

20. Yes. The Intervenors have previously in its filing of November 22nd dealt with some of the issues raised in subquestions a - e and when the Intervenors complete shortly their work on this matter they will supplement their answer to this question and answer fully questions a - e.

21. Yes. See answers to Nos. 19 and 20 above.

22. Intervenors have contacted various State, Federal and local officials with regard to the consideration of sites other than Perkins. These contacts have been so numerous and for over such a long period of time it would not be possible for Intervenors to give a list of such contacts.

23. Yes. They remain active.

24. The Intervenors have discussed and had meetings in regard to the issues under consideration many times over the past several years. Intervenors do not now know the dates of such meetings and discussions.

25. The Intervenors are aware of the position which they take in response to these Interrogatories.

26. David Springer and Mary Davis.

27. Yes. Intervenors have attended numerous local, State and Federal meetings over the past several years in regard to the subject of alternate sites in general. It would not be possible to list the dates and places of such meetings.

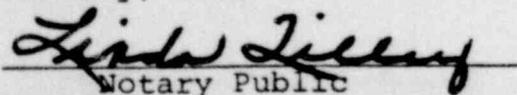
28. Yes. See answer to No. 27 above.

29. Yes. See answer to No. 27 above. The types of meetings which have been attended over the past several years have not limited themselves in the manner set out by questions No. 27, 28 and 29. At most of these meetings all three of the issues raised in these three questions have been brought up in one way or the other.

30. The Intervenors have attended various meetings, including hearings of this Board, which presented the question of power plant siting. As to whether the authorities presented in these hearings and other hearings by State agencies were knowledgeable is a question which has not been finally decided and indeed is perhaps the purpose of this re-opened hearing on January 29, 1979. Therefore, Intervenors would not concede that certain authorities presented up to this date are in fact knowledgeable, but hope to present such knowledgeable authorities at the hearing on January 29, 1979.

This the 2nd day of January, 1979.

Sworn to and subscribed
before me this 2nd day of
January, 1979.


Notary Public

My commission expires:
February 7, 1980


William G. Pfefferkorn

CERTIFICATE OF SERVICE

I hereby certify that copies of Preliminary Answers to Interrogatories and Requests to Produce

in the above-captioned matter have been served on the following by deposit in the United States mail this 2nd day of January, 1979.

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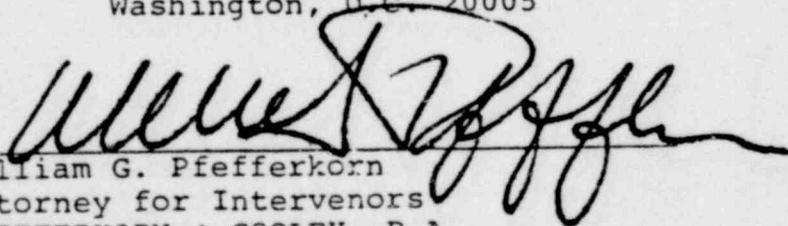
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