

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

In the Matter of
Consumers Power Company
(Big Rock Point Nuclear Power Station)

Docket No. 50-155

RESPONSE TO LICENSEE'S FIRST SET OF
INTERROGATORIES TO JOHN O'NEILL II

(Interrogatory and text of contentions not repeated for brevity.)

Gentlemen:

My Name is JoAnne Bier. I live in Charlevoix, Michigan. I plan on being a witness at the Hearing relating to Consumers Power Company's request to expand their spent fuel pool. I plan on speaking to the best of my ability, to the following contentions of John O'Neill II.

Contention IIB:

I will be using the following documents to state my case:
Licensee Event Reports March, 1963-to date.

Contention IID:

I will be using the following documents to state my case:
Memorandum file(s) Consumers Power Company, Atomic Energy Commission, Nuclear Regulatory Commission, March 1963-to date
Miscellaneous file(s) Consumers Power Company, Atomic Energy Commission, N.R.C. March 1963-to date
Applicant Correspondence from Consumers Power Co. 1971 July, 1979

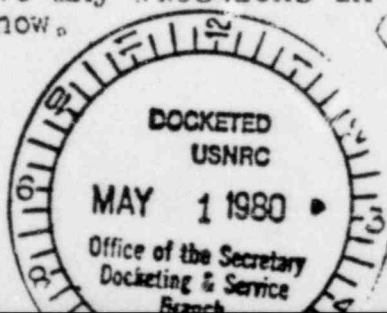
Contention IIE-4:

I will be using the following documents to state my case:
Consumers Power Co. Requirements From Review Of TMI-2 Accident:
Criteria To Be Used For Implementation Oct. 30, 1979
Applicant Correspondence January 18, 1980--Requirements From Review of TMI-2 Accident: Actions Taken In Response
Transmittal Of Updated Pages

Contention VII:

I will be using the following documents to state my case:
Licensee Event Report March 1963-to date
Applicant Correspondence Consumers Power Co. March 1963-to date
Applicant Correspondence N.R.C. March 1963-to date
G.E. Three Employees-Hubbard, Minor, Bridenbaugh: Testimony before the USNRC, 1976
IAE Bulletins 1963-1980
Charlevoix Courier, Petosky News Review, Detroit Free Press, Wall Street Journal, In regards to Midland Nuclear Plant, Big Rock Point Nuclear Plant, Palisades Nuclear Plant.

If you have any questions in regards to my being a witness, please let me know.



JoAnne Bier
204 Clinton
Charlevoix, Michigan 49720
(616) 347-3973

Signed by John O'Neill II
Witnessed by Mrs. Bier

I will be using the following documents to state my case:
Short-Term Lessons Learned From TMI-2 Accident: Additional
Information Requested During Site Visit March 14, 1980,
Consumers Power Company, Requirements From Review Of
TMI-2 Accidents Criteria To Be Used For Implemen-
tation October 30, 1979.
Applicant Correspondence January 13, 1980--Requirements
resulting From Review Of TMI-2 Accident: Actions
Taken in Response-Transmittal of Updated Pages.

Contention VII states as follows:

Because of the licensee's history of mismanaging the plant,
especially the spent fuel pool, it has demonstrated an inability
to properly manage an expanded fuel pool.

I will be using the following documents to state my case:
Licensee Event Report March 1963-to date.
G.E. three Employees, Hubbard, Bridenbaugh, Minor;
Testimony before the USNRC 1976,
I. & E. Bulletins 1963-1980
Petoskey News Review, Charlevoix Courier, Detroit Free
Press, Wall Street Journal, (Midland Nuclear
Power Facility, Big Rock Point, Palisades).

If there are any questions regarding this response to the
above mentioned interrogatories, please let me know.

Shirley J. Johns
Shirley J. Johns
Route 1, Box 88
Ellsworth, Michigan 49729
(616) 599-2298

Stencil signed by J.M.H.
Original signed by Mrs. Johns.

Dated 3 / 28 / '80

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
CONSUMERS POWER COMPANY
(Big Rock Point Nuclear Power Plant)

} Docket No. 50-155
}

RESPONSE TO LICENSEE'S FIRST SET OF
INTERROGATORIES TO JOHN O'NEILL II

Pursuant to 10 C.F.R. § 2.740b, Consumers Power Company (Licensee) requests that Intervenor John O'Neill II answer each of the following interrogatories separately and fully, in writing and under oath and affirmation, in accordance with the Definitions and Instructions provided herein.

Gentlemen:

My name is Shirley J. Johns. I live in Eastport, Michigan. I am going to be a witness at the Hearing Conference relating to Consumers Power Company's request to expand their spent fuel pool. I plan on speaking for the following contentions of John O'Neill:

Contention IIB states as follows:

The licensee's plan is deficient in failing to discuss the environmental hazards associated with small to medium leaks of radioactive water from the expanded spent fuel pool.

I will be using the following documents to state my case:

Licensee Event Report March 1963 to date.

Contention IID states as follows:

The licensee has not adequately provided for the protection of the public against the increased release of radioactivity from the expanded fuel pool as a result of the breach of containment due to the crash of a B-52 bomber.

I will be using the following documents to state my case:

Miscellaneous file(s), Consumers Power Company, Atomic
Energy Commission,
Nuclear Regulatory Commission, March 1963-to date,
Memorandum file(s), Consumers Power Company, Atomic
Energy Commission, N.R.C., March, 1963-to date,
Applicant Correspondence from Consumers Power Company,
1971, July, 1979

Contention IIE-4 states as follows:

In the event of an accident which results in a substantial release of radioactivity from the expanded fuel pool, the containment building does not provide adequate shielding to protect the public health and safety.

Route 2, Box 44
Maple City, Michigan 49664
April 11, 1980

Joseph Gallo, Esquire
Isham, Lincoln & Beale
1120 Connecticut Avenue, N.W.
Suite 325
Washington, D.C. 20036

Regarding Big Rock, Docket Number 50-155

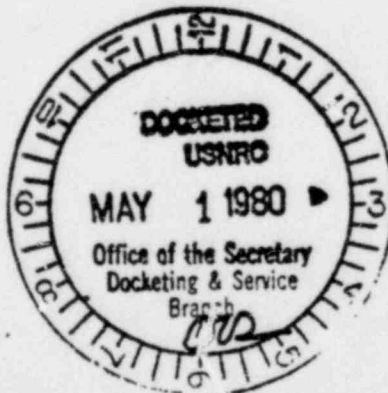
Dear Mr. Gallo:

Attached are the statements of JoAnne Bier and Shirley Johns, who should, God willing, be acting as witnesses for my contentions in the Big Rock Spent fuel matter.

These are transmitted to you exactly as I have recieved them, except for the noted shortenings.

All inquires should be directed to Shirley and JoAnne.

May I remind you that JoAnn and Shirley are authorities on the documents cited, by virtue of long, long hours spent reviewing these documents in the Charlevoix Public Library. Indeed, these two women possibly know these documents better than anyone else on this Earth.



I remain yours, for a safe future,

John O'Neill II
John O'Neill II

Copies sent to all on the standard mailing list. Should the board deny me relief from the 20 copy requirement, the remaining copies will be sent. 2 copies sent to the Secretary of the Commission, USNRC.

P.S. Hope you are enjoying the spring in D.C. As in the Capital, we too enjoy many cherry blossoms, although ours come much later. This area is the nation's leader in cheery crops!