

7/9/80

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
CONSUMERS POWER COMPANY) Docket No. 50-155
)
(Big Rock Point Nuclear Power)
Station))

LICENSEE'S SECOND SET OF INTERROGATORIES
TO JOHN O'NEILL

Pursuant to 10 CFR §2.740b, Consumers Power Company ("Licensee") requests that Intervenor John O'Neill, II answer the following interrogatories fully, in writing, under oath or affirmation.


1. O'Neill Contention IIE-3 states that the Application has not "adequately analyzed" the possibility of criticality occurring in the Big Rock Point Plan spent fuel pool because of the increased density of spent fuel storage in the additional racks. (Contention IIE-3 assumes that there is no gross distortion of the racks for purposes of the criticality analysis). Please explain in detail, with specific reference to Section 4 of Applicant's Description and Safety Analysis Report, dated April 28, 1979, and with specific reference to Applicant's Answers to Christa-Maria's Interrogatories 9-22 through 9-30, dated March 21, 1980,

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in what way or ways Applicant's criticality analysis is inadequate, as alleged in Contention IIE-3.

2. Identify all documents examined or relied upon and all persons consulted in responding to paragraph 1, above.

Respectfully submitted,



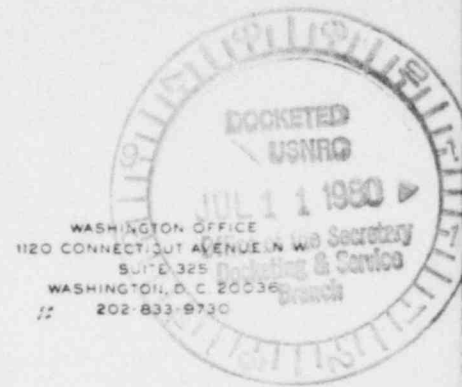
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TELEPHONE 312-558-7500 TELEX 2-5286

July 8, 1980



Mr. John O'Neill, II
Route 2, Box 44
Maple City, Michigan 49664

Dear John:

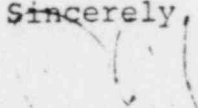
Enclosed is a second set of interrogatories for you to answer, addressing the criticality contention, O'Neill Contention II E-3. As you know, I wrote you informally on May 8, 1980 seeking clarification of this contention. Since we have yet to receive a written response from you, we are now making a formal request for this information.

You need not furnish copies of documents identified in these interrogatories if they are publicly available. However, please identify them carefully by title, author, date, publisher, and type of document.

Under the schedule approved by the Licensing Board in its Order of January 17, 1980, you have fourteen (14) days after you receive this letter to answer these interrogatories. Please call me if you have any questions.

I hope the summer season at your restaurant is going well. I appreciate you must be busy, but please do the best you can in answering these interrogatories.

Sincerely,


Philip P. Steptoe

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ENC.