

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GENERAL ELECTRIC COMPANY

(GE Morris Operation Spent
 Fuel Storage Facility)

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Docket No. 70-1308
 (Renewal of SNM-1265)

NRC STAFF INTERROGATORIES TO, AND
 REQUEST FOR THE PRODUCTION OF
DOCUMENTS FROM, INTERVENOR ROREM, ET AL.

The Nuclear Regulatory Commission (NRC) Staff hereby requests that Intervenor Rorem, et al., pursuant to 10 CFR § 2.740b and in accordance with the Atomic Safety and Licensing Board's Order Extending Schedule for Discovery of June 23, 1980, answer separately and fully, in writing under oath or affirmation, the following interrogatories.

For each response to the interrogatories set forth below, identify the person or persons who prepared or substantially contributed to the preparation of the response.

The NRC Staff further requests that Intervenor Rorem, et al., pursuant to 10 CFR § 2.741, provide copies of, or make available for Staff inspection and copying, the documents designated by Intervenor in response to certain of the accompanying interrogatories.

I. General Interrogatories^{1/}

G-1 State whether or not you intend to call any person or persons as witnesses in this proceeding in support of

(a) Contention 1(b)

(b) Contention 2

(c) Contention 6

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

G-2 Indicate which of those persons identified in response to Interrogatory G-1 will appear voluntarily and which persons you intend to subpoena.

G-3 Provide summaries of the views, positions, or proposed testimony on

(a) Contention 1(b)

(b) Contention 2

(c) Contention 6

of all persons named in response to Interrogatory G-1 that you intend to present during this proceeding.

^{1/} Interrogatories in this section should be answered with respect to each contention. The contentions referred to are those contentions raised by Intervenor as modified, renumbered and admitted by the Licensing Board in its Order Ruling on Contentions of the Parties issued on June 4, 1980.

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) Contention 1(b)
- (b) Contention 2
- (c) Contention 6

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

G-5 If the representations made in

- (a) Contention 1(b)
- (b) Contention 2
- (c) Contention 6

are based in whole or in part on any documents prepared by the Licensee or NRC Staff which you contend are deficient, identify the documents and specify the particular portions thereof you regard as deficient and explain why they are deficient.

G-6 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

- (a) Contention 1(b)
- (b) Contention 2
- (c) Contention 6

(d) Board Question 1 as set forth in the Order Ruling on Contentions of Parties, dated June 4, 1980.

II. Interrogatories Related to Specific Contentions^{2/}

Contention 1(b)

C1-1 Define "risks" as that term is used in Contention 1(b) and specifically as the term is used with regard to parts (i) through (ix) of Contention 1(b).

C1-2 As to Contention 1(b)(i):

(a) describe the tornado impelled missile referred to and state the basis for the assertion that such a missile could be generated by a tornado and could impact the Morris Spent Fuel Storage Facility;

(b) describe the tornado missile accident referred to and state the basis for the assertion that such an accident could be caused by a tornado missile at the Morris Spent Fuel Storage Facility;

^{2/} The contentions referred to are those contentions raised by Intervenor as modified, renumbered and admitted by the Licensing Board in its Order Ruling on Contentions of the Parties issued on June 4, 1980.

- (c) describe the tornado missile accident consequences referred to and state the basis for your assertion that such consequences could occur;
- (d) state the basis for your assertion that radioactive releases from a tornado missile accident could exceed 10 CFR Part 20 limits;
- (e) indicate the CSAR description of the risks and consequences of tornado missile accidents that you would consider to be adequate and provide the basis for your position in this regard.

C1-3 As to Contention 1(b)(ii):

- (a) specifically describe the loss of coolant accident referred to, describe the mechanism causing such loss of coolant accident, and state the basis for your assertion that such loss of coolant accident could occur;
- (b) identify the "building structure" and describe the "rift" in the building structure referred to, describe the mechanism or accident causing such a "rift," and state the basis for your assertion that such a rift could occur;

- (c) state the basis for your assertion that the loss of coolant accident could occur in conjunction with an accident causing a rift in the building structure;
- (d) describe the consequences (referred to in Contention 1(b)(ii)) of a loss of coolant accident alone and the basis for your assertion that such consequences could occur;
- (e) describe the consequences (referred to in Contention 1(b)(ii)) of a loss of coolant accident in conjunction with an accident causing a rift in the building structure and state the basis for your assertion that such consequences could occur;
- (f) state the basis for your assertion that radioactive releases from a loss of coolant accident alone or a loss of coolant accident in conjunction with an accident causing a rift in the building structure could exceed 10 CFR Part 20 limits;
- (g) indicate the CSAR description of the risks and consequences of a loss of coolant accident and of a loss of coolant accident in conjunction with an accident causing a rift in the building structure that you would consider

to be adequate and provide the basis for your position in this regard.

C1-4 As to Contention 1(b)(iii);

- (a) describe specifically and in detail the "earthquake-related accidents" referred to and state the basis for your assertion that each of those accidents could result from the earthquakes the facility is required to resist under the existing facility license;
- (b) describe the consequences (referred to in Contention 1(b)(iii)) of the identified earthquake-related accidents and state the basis for your assertion that such consequences could occur;
- (c) state the basis for your assertion that radioactive releases from earthquake-related accidents could exceed 10 CFR Part 20 limits;
- (d) indicate the CSAR description of the risks and consequences of earthquake-related accidents that you would consider to be adequate and provide the basis for your position in this regard.

C1-5 As to Contention 1(b)(iv):

- (a) describe specifically the "sabotage-related accidents not analyzed in NEDM-20682" which you assert should be considered and state the basis for your assertion that such accidents could occur and should be evaluated;
- (b) describe the consequences (referred to in Contention 1(b)(iv)) of the identified sabotage-related accidents and state the basis for your assertion that such consequences could occur;
- (c) state the basis for your assertion that radioactive releases from sabotage-related accidents could exceed 10 CFR Part 20 limits;
- (d) indicate the CSAR description of the risks and consequences of sabotage-related accidents that you would consider to be adequate and provide the basis for your position in this regard.

C1-6 As to Contention 1(b)(v):

- (a) describe specifically the "fire"-related consequences referred to and state the basis for your assertion that such occurrences could take place;

- (b) describe the consequences (referred to in Contention 1(b)(v)) of the identified fire-related occurrences and state the basis for your assertion that such consequences could occur;
- (c) state the basis for your assertion that radioactive releases from fire-related occurrences could exceed 10 CFR Part 20 limits;
- (d) indicate the CSAR description of the risks and consequences of fire that you would consider to be adequate and provide the basis for your position in this regard.

C1-7 As to Contention 1(b)(vi):

- (a) define what is meant by "flooding" as that term is used in the contention, describe the mechanisms (both natural and manmade) which you assert could cause "flooding," and state the basis for your assertion that such mechanisms could cause "flooding;"
- (b) describe the consequences (referred to in Contention 1(b)(vi)) of flooding, indicate the manner in which flooding could cause releases of radioactivity and state

the basis for your assertion that flooding could result in the described consequences and/or releases of radioactivity;

- (c) state the basis for your assertion that radioactive releases from flooding could exceed 10 CFR Part 20 limits;
- (d) indicate the CSAR description of the risks and consequences of flooding that you would consider to be adequate and provide the basis for your position in this regard.

C1-8 As to Contention 1(b)(vii):

- (a) state the basis for your assertion that "acts of war" can be considered in this license renewal proceeding, citing any provisions of statutes or regulations which, to your knowledge, support your assertion;
- (b) define what is meant by "acts of war" as that phrase is used in the contention and describe the "acts of war" to which you refer in the contention;

- (c) describe the consequences (referred to in Contention 1(b)(vii)) of the "acts of war," state the basis for your assertion that such consequences could occur, and state the basis for your assertion that consequences from "acts of war" could exceed 10 CFR Part 20 limits;
- (d) indicate the CSAR description of the risks and consequences of "acts of war" that you would consider to be adequate and provide the basis for your position in this regard.

C1-9 As to Contention 1(b)(viii):

- (a) describe specifically the "human error"-related occurrences referred to in the contention;
- (b) describe any instances (including date and citations to any reports on the matter) of the occurrence of human error resulting in accidents or the release of radioactivity at the GE Morris facility of which you are aware;
- (c) describe the consequences (referred to in Contention 1(b)(viii)) of human error-related occurrences and state the basis for your assertion that such consequences could result;

- (d) state the basis for your assertion that radioactive releases from human error could exceed 10 CFR Part 20 limits;
- (e) indicate the CSAR description of the risks and consequences of human errors that you would consider to be adequate and provide the basis for your position in this regard.

C1-10 As to Contention 1(b)(ix):

- (a) define what is meant by "massive electrical power failure" as that phrase is used in the contention, describe the mechanisms (both natural and manmade) which you assert could cause "massive electrical power failure," and state the basis for your assertion that such mechanisms could cause the power failure;
- (b) describe the consequences (referred to in Contention 1(b)(ix)) of massive electrical power failure, indicate the manner in which such power failure could cause releases of radioactivity, and state the basis for your assertion that massive electrical power failure could result in the described consequences and/or releases of radioactivity;

- (c) state the basis for your assertion that radioactive releases from massive electrical power failure could exceed 10 CFR Part 20 limits;

- (d) indicate the CSAR description of the risks and consequences of massive electrical power failure that you would consider to be adequate and provide the basis for your position in this regard.

Contention 2

- C2-1 State specifically the reasons why the GE Morris Physical Security Plan does not meet the requirements of 10 CFR Part 73. Include in your response an identification of the specific sections of 10 CFR Part 73 which you believe are not met and provide the basis for your assertions that those sections are not met.

- C2-2 Describe in detail the "advances in the technology of explosives" referred to in Contention 2 and state the basis for your assertion that such "advances in the technology of explosives . . . could make sabotage a more probable event" at the GE Morris facility.

- C2-3 Indicate the CSAR assessment of credible risks of sabotage-related events accounting for advances in the technology of explosives that you would consider to be adequate and provide the basis for your position in this regard.

Contention 6

C6-1 As to Contention 6(a):

- (a) describe the "area," in terms of distance from the Morris facility, for which you believe comprehensive evacuation planning is necessary and provide the detailed basis for your response;
- (b) what is the basis for your assertion that Joliet and Kankakee might need to be evacuated?

C6-2 As to Contention 6(b):

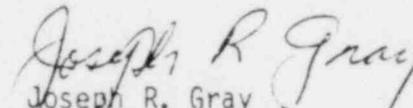
- (a) what is meant by "large numbers of people" as that phrase is used in Contention 6(b)?
- (b) describe the accident or event that you assert would result in the exposure and/or contamination of "large numbers of people" and provide the basis for your assertion that such an accident could occur at the Morris facility.

C6-3 As to Contention 6(c), you state that the Applicant should be responsible for informing area residents "that the possibility of such an accident does exist." Specifically describe the accident

or accidents referred to (the response sought is a description of specific accident scenarios rather than a general response such as "any accident requiring evacuation") and provide the basis for your assertion that such accidents could occur.

C6-4 As to Contention 6(d), describe in detail the specific inadequacies in the Applicant's emergency planning which exist with regard to "formation of evacuation plans," "equipping hospitals," "training personnel," and "for maintenance of any equipment needed." In your view, what more should be done by the Applicant with regard to these matters and why?

Respectfully submitted,


Joseph R. Gray
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 15th day of July, 1980