

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
GENERAL ELECTRIC COMPANY) Docket No. 70-1308
) (Renewal of SNM-1265)
(GE Morris Operation Spent Fuel)
Storage Facility))

INTERVENOR'S INTERROGATORIES, FIRST SET, DIRECTED TO STAFF
OF THE NUCLEAR REGULATORY COMMISSION

Intervenor, PEOPLE OF THE STATE OF ILLINOIS, by WILLIAM J. SCOTT, Attorney General of the State of Illinois, pursuant to Rules and Regulations of the Nuclear Regulatory Commission, 10 C.F.R. §2.740 hereby request that The Staff of the Nuclear Regulatory Commission (Staff) answer under oath the following written Interrogatories fully in writing within 14 days after the date of service of this Notice. The Answer should include all information up to the date of the verification thereof.

INSTRUCTIONS

For each person so identified:

A. Give such person's name, home address and telephone number, and business address and telephone number.

B. Give such person's academic professional credentials including degrees received, fellowships, professional societies and professional honors.

8007180 387

C. Give such person's present title, job responsibilities and duties, number of years in such position, and name of such person's supervisor.

D. List such person's previous work experience including:

- (i) Name of position and employer;
- (ii) Number of years in such position;
- (iii) Duties and responsibilities in one's such position;
- (iv) Name of such person's supervisor while in that position.

E. State whether or not such person has given or prepared any oral or written statements regarding each area or areas for which such person has been identified.

F. For each such statement identified in E:

- (i) Identify such statement;
- (ii) State whether such statement was written or oral;
- (iii) State when, by whom and to whom such statement was made or submitted;
- (iv) If this statement was written, attach a true and accurate copy of it to the answer herein.

I N T E R R O G A T O R I E S

INTERROGATORY NO. 1: Identify the person or persons who are employed by or are representatives of the Nuclear Regulatory Commission and who have knowledge about the following:

A. Any interactions between the Department of Energy (DOE) or the Nuclear Regulatory Commission (NRC) and General Electric (G.E.) regarding the use of the Morris operation as a federal repository for spent fuel or any other future use.

B. Any plans , programs, or proposals for Federal Government use of the Morris facility as a federal repository for spent fuel.

C. Security Plans

D. License Amendments

E. Emergency Plans

F. Liaison with the general population and emergency facilities and state agencies dealing with emergency and evacuation plans.

G. Radiation monitoring or testing.

H. Any environmental appraisals or analyses prepared with regard to the use of the Morris facility as a spent fuel storage facility from 1979 forward.

I. Any interactions with General Electric in regard to the license renewal application.

J. Any interactions with G.E. personnel in regard to current operation of Morris.

K. Any interactions with G.E. in regard to the License Amendment requested January 18, 1980.

L. Amount of fuel projected to be stored during license period.

INTERROGATORY NO. 2: Identify any officials or representatives of the Nuclear Regulatory Commission with whom G.E. has had contact in regard to the license renewal proceeding.

INTERROGATORY NO. 3: Identify any plans or proposals for change in use of the Morris facility which would necessitate a license amendment to the existing license.

INTERROGATORY NO. 4: Identify all experts to be used as consultants and/or witnesses, areas of expertise and contentions to be addressed.

INTERROGATORY NO. 5: Describe the license amendment requested on January 18, 1980, and the reasons therefore.

INTERROGATORY NO. 6: In regard to Revision c2 of NEDO-21326 described in detail:

A. All changes, tests and experiments proposed or projected.

B. Which changes in plant, procedures, tests and experiments related to receipt, storage and transfer of spent fuel are proposed to be performed without prior approval of NRC.

C. Any other types of changes in plant operation, procedures, tests or experiments are proposed or projected to be performed without prior NRC approval.

D. Who will make the determination that changes in plant operation, procedures, tests and experiments will not require a change in the Operation Specifications, Chapter 10 of NEDO-21326 C, does not involve unreviewed safety or environmental issues and does not decrease the effectiveness of the physical security plan; what standards will be applied to make this determination; when will that determination be made.

E. What type of NRC review of these changes listed above is anticipated.

F. What type of reports of the changes shall be made to the NRC, to State agencies, to shareholders and to the public; when will these reports be issued.

G. Will the NRC or any other agency be notified of the inception of any changes, as listed above.

H. Identify any NRC regulations that permit changes in plant operation or procedure without prior NRC approval.

INTERROGATORY NO. 7: Identify plans for future storage of spent fuel until the year 2000 including:

- (A) estimated shipment date(s),
- (B) number of assemblies,
- (C) point of origin: owner
- (D) mode of transportation,
- (E) number of years of storage estimated.

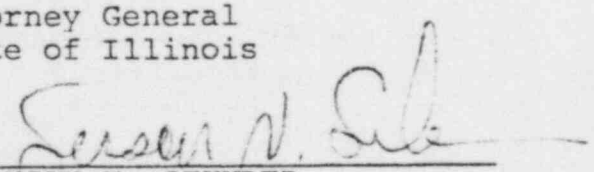
INTERROGATORY NO. 8: In regard to Spent Fuel Storage Problem at Morris:

- A. Have any fuel rods ruptured, exploded, or otherwise leaked radiation while in storage?
If yes, please explain.
- B. Have you experienced problems with warped or damaged fuel assemblies in storage? If yes, please explain.
- C. Have you experienced problems with damaged racks?
If yes, please explain.
- D. Has the liner of the spent fuel pool ever leaked?
If yes, please state total amount of coolant lost, ultimate destination of coolant that leaked, and cause of leak.

- E. Has the pool radioactive waste system ever failed?
If yes, please explain.
- F. Has the pool coolant circulation system ever failed?
If yes, please explain.
- G. Have you had problems with "crud" buildup on the assemblies or in the pool? If yes, please explain.
- H. Has the spent fuel pool ever been drained? If yes, please explain.
- I. Has the radiation level of the spent fuel pool ever exceeded allowable limits? If yes, please explain.
- J. Have fuel assemblies ever been dropped during handling? If so, please list dates, number of assemblies dropped, and extent of damage, if any.
- K. Please describe any problems encountered in storing spent fuel not described in response to the above questions.

Respectfully submitted,

WILLIAM J. SCOTT
Attorney General
State of Illinois

BY: 
SUSAN N. SEKULER
Assistant Attorney General

7/14/80

OF COUNSEL:

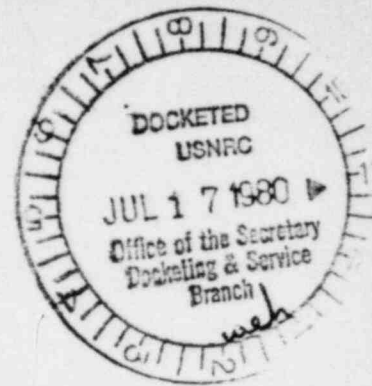
JOHN VAN VRANKEN
Chief, Northern Region
Environmental Control Division

ANN RAPKIN
Assistant Attorney General
Environmental Control Division

188 West Randolph, Suite 2315
Chicago, Illinois 60607
(312) 793-2491

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
GENERAL ELECTRIC COMPANY) Docket No. 70-1308
)
(GE Morris Operation Spent Fuel)
Storage Facility))

CERTIFICATE OF SERVICE

I hereby certify that copies of Intervenor's Interrogatories, First Set, Directed to Staff of the Nuclear Regulatory Commission in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, at P.O. 160 North LaSalle, Chicago, Illinois.

Andrew C. Goodhope, Esq.
Chairman
3320 Estelle Terrace
Wheaton, MD 20906

Dr. Linda W. Little
5000 Hermitage Drive
Raleigh, NC 27612

Dr. Forrest J. Remick
305 E. Hamilton Avenue
State College, PA 16801

Ronald Szwajkowski, Esq.
Mayer, Brown and Platt
231 South LaSalle Street
Chicago, Illinois 60604

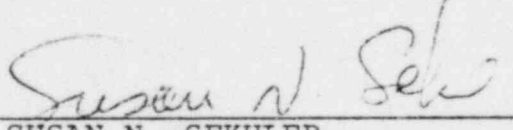
Bridget Little Rorem
Essex, IL 60935

Edward Firestone, Esq.
Legal Operation
General Electric Company
175 Curtner Avenue
Mail Code 822
San Jose, CA 95125

Atomic Safety and Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Marjorie Ulman Rothschild
Office of the Legal Director
U.S. Nuclear Regulatory Commission
Washington D.C. 20555



SUSAN N. SEKULER

DATED: July 14, 1980