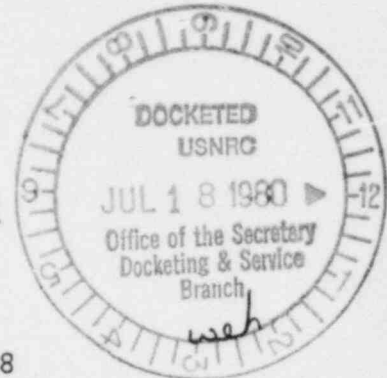


Dated: July 15, 1987

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))	

GENERAL ELECTRIC'S INTERROGATORIES
PROPOUNDED TO THE INTERVENOR,
ROREM, et al.

General Electric propounds the following interrogatories to ROREM, et al. in accordance with the provisions of 10 C.F.R. § 2.740b.

1. For each witness whom you will or may call as an expert to give opinion testimony in the hearing of this matter, state the following:

- a. Name and address;
- b. Name and address of his employer of the organization with which he is associated in any professional capacity;
- c. The field in which he is to be offered as an expert;
- d. A summary of his qualifications within the field in which he is expected to testify;
- e. The substance of the facts to which he is expected to testify;
- f. The substance of the opinions to which he

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is expected to testify and a summary of the grounds for each opinion; and

g. State the dates and addressees of all reports rendered by such experts.

2. For each person retained or specifically employed as an expert with regard to this license renewal application or hearing, about whom no decision has been made as to whether such expert will be called, state the following:

a. Name and address;

b. His particular field of expertise;

c. A summary of his qualifications within the field; and

d. Whether such expert has submitted or transmitted any reports analyses or opinions in any form. If so, state the dates and addressees of all reports, analyses or opinions.

3. Define the phrase "risks and consequences", including sufficient detail for translation of the meaning of the phrase into engineering specifications, as used in subparagraph (b) of Contention 1.

4. With reference to Contention 1(b), state with particularity the manner in which the following accidents are postulated to occur at the Morris Operation, describing in technical detail the postulated consequences thereof, including the anticipated magnitude of the alleged release of radioactive elements, and state the facts upon which such postulations are based:

- a. An accident caused by a tornado-impelled missile;
- b. An accident involving the loss of coolant, either alone or in conjunction with an accident causing a rift in the building structure;
- c. Accidents involving earthquakes;
- d. Sabotage-related accidents not analyzed in NEDM-20682;
- e. Fire;
- f. Flooding;
- g. Acts of war;
- h. Human error; and
- i. Massive electrical power failure.

5. State with particularity the manner in which the CSAR does not adequately describe the "risks and consequences" of the accidents and occurrences listed as subparts (i) through (ix) inclusive of Contention 1(b).

6. State with particularity the manner in which the Physical Security Plan does not meet the requirements of 10 C.F.R. Part 73, as alleged in Contention 2.

7. Define the phrase "risks of sabotage related events" used in Contention 2 and specifically state the facts upon which the contention that such events are a threat are based.

8. State with particularity the manner in which the CSAR does not adequately assess "risks and consequences of sabotage related events" as alleged in Contention 2.

9. With reference to Contention 2, state the facts upon which the contention that "advances in the technology of explosives . . . could make sabotage a more probable event" is based and describe the impact of such alleged developments on the alleged risk of sabotage at the Morris Operation.

10. With reference to Contention 2, state the regulatory basis, including the specific statute or regulation relied upon, which requires the CSAR to include an assessment of "credible risks of sabotage related events."

11. Describe in technical detail any accident contemplated by Contention 6 which is postulated to require:

- a. The evacuation of large numbers of people in the Joliet and/or Kankakee areas and/or
- b. The hospitalization of large numbers of people within a 50-100 mile range of the facility.

12. Define the term "measures" used in subparagraph (c) of Contention 6.

13. With reference to Contention 6, state the regulatory basis, including the specific regulation or statute relied upon, which require that:

- a. A comprehensive evacuation plan for the area should exist;
- b. Hospitals within a 50-100 mile range should be equipped to handle large numbers of people exposed to radiation;
- c. General Electric take responsibility for

informing residents of a possible accident at the Morris Operation; and

d. General Electric take financial responsibility for forming an evacuation plan, equipping hospitals, training personnel, and maintaining equipment described in this contention.

With regards to the Contentions admitted by the Board in this matter, these Interrogatories are continuing Interrogatories and require supplemental answers if the State of Illinois obtains further information between the time the Answers are served and the time of an initial decision in the matter.

Respectfully submitted,
GENERAL ELECTRIC COMPANY

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UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION



In the Matter of)
)
 GENERAL ELECTRIC COMPANY)
)
 Consideration of Renewal of)
 Materials License No. SNW-1265)
 Issued to GE Morris Operation)
 Fuel Storage Installation)

Docket No. 70-1308

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a copy of GENERAL ELECTRIC'S INTERROGATORIES PROPOUNDED TO THE INTERVENOR, ROREM ET AL., in the above-captioned proceeding on the following persons by causing the said copies to be deposited in the United States mail at 231 South LaSalle Street, Chicago, Illinois, in plainly addressed and sealed envelopes with proper first class postage attached before 5:00 P.M. on July 15, 1980:

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