

Dated: July 15, 1980

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,
STATE OF ILLINOIS

General Electric propounds the following interrogatories to the State of Illinois 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 or 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;

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f. The substance of the opinions to which he 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. With reference to Contention 1(a), state with particularity the basis for the contention that the Consolidated Safety Analysis Report ("CSAR") should be required to describe the consequences of simultaneous accidental radioactive releases from the Dresden Nuclear Power Station ("DNPS") and the Morris Spent Fuel Storage Facility (the "Morris Operation").

4. With reference to Contention 1(a), describe in technical detail the accident postulated to occur at DNPS, giving the circumstances thereof, and state with particularity the facts and data upon which such postulate is based.

5. With reference to Contention 1(a), describe in technical detail the accident postulated to occur at the Morris Operation that would result in a release of radioactive material off-site based on fuel storage in terms of the conditions specified in the CSAR, NEDO-21326C, Chapter 10, and state the facts upon which such contention is based.

6. 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.

7. 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.

8. 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).

9. 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.

10. 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.

11. State with particularity the basis for the contention that the CSAR should be required to assess "risks and consequences of sabotage related events" as alleged in Contention 2.

12. 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.

13. 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."

14. State the regulatory basis, including the specific

regulation or statute relied upon, which requires the CSAR to state the projected effects on the health of personnel, and their families from exposure to radiation with regard to each subparagraph (a) through (e) inclusive of Contention 3.

15. State with particularity the reasons for the contention that the CSAR should state "the projected effects on health of personnel and their families from occupational exposure to radiation" as described in subparagraphs (a) through (e) inclusive of Contention 3.

16. State with particularity the facts upon which the contentions of subparagraphs (a) through (e), inclusive of Contention 3 are based.

17. With reference to Contention 4, state the regulatory basis, including the specific regulation or statute, which requires that:

- a. General Electric provide a decommissioning plan for the Morris Operation;
- b. General Electric provide assurance of financial capability to guarantee that decommissioning and decontamination costs are fully covered;
- c. General Electric provide a contingency plan to decommission the Morris Operation should an immediate and/or permanent abandonment of the Morris Operation become necessary; and
- d. General Electric provide consideration of

perpetual care and maintenance of the Morris Operation.

e. General Electric provide a bond on or assurance of financial capability for the decontamination and decommissioning of the Morris Operation.

18. State with particularity the facts upon which the contentions of subparagraphs (a) through (d) inclusive of Contention 4 are based.

19. State with particularity the facts upon which the allegations of subparagraphs (a) and (b) of Contention 4 are based.

20. Describe in detail the "accident or other unforeseen event" postulated in Contention 4(c), which would require abandonment of the Morris Operation and state with particularity the facts upon which such postulate is based.

21. Define the phrase "incomplete decontamination", as used in subparagraph (d) of Contention 4. Include the technical criteria for defining that phrase.

22. State with particularity the facts upon which the allegation of Contention 4(d) that incomplete decontamination or decommissioning may result from the contingencies described in subparagraphs (i) through (iv) inclusive is based.

23. With reference to Contention 5, state the regulatory basis, including the specific regulation or statute relied upon, which requires that (1) the Emergency Plan specify procedures to unload the spent fuel pool and to transport and/or

store the irradiated fuel in the event of an emergency; (2) the CSAR contain a plan for emergency transportation of irradiated fuel; and (3) the license renewal application documentation contain adequate test programs or other means to determine if the emergency plan is adequate.

24. With reference to Contention 5, describe in detail the emergency which would necessitate the unloading of the spent fuel pool and/or the transportation and/or storage of irradiated fuel.

25. Define the term "emergency transportation" used in Contention 5.

26. With reference to Contention 5, state with particularity under what circumstances emergency transportation of spent fuel would be required.

27. Define the phrase "adequate test programs" used in Contention 5.

28. 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.

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

30. With reference to Contention 6, state the regulatory basis, including the specific regulation or statute relied upon,

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

31. With reference to Contention 7, identify with particularity all significant environmental impacts of normal operations of the Morris Operation and state the factual basis for each.

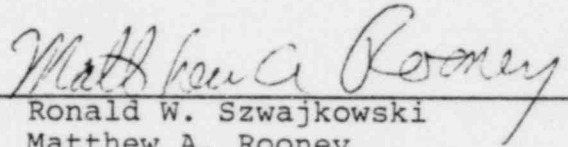
32. With reference to Contention 7, state the regulatory basis, including the specific statute or regulation, which requires that the NRC issue an Environmental Impact Statement as opposed to an Environmental Impact Appraisal and a negative declaration.

With regard 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) Docket No. 70-1308
Consideration of Renewal of)
Materials License No. SNW-1265)
Issued to GE Morris Operation)
Fuel Storage Installation)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he served a copy of GENERAL ELECTRIC'S INTERROGATORIES PROPOUNDED TO THE INTERVENOR, STATE OF ILLINOIS, 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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