

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



In the Matter of )  
)  
)  
DUKE POWER COMPANY )  
)  
(Perkins Nuclear Station, )  
Units 1, 2 and 3) )

Docket Nos. JTN 50-488  
STN 50-489  
STN 50-490

APPLICANT'S INTERROGATORIES TO INTERVENORS  
AND REQUESTS TO PRODUCE

Pursuant to 10 CFR §§2.740b and 2.741, Applicant serves the following interrogatories and requests to produce on Intervenor to be answered under oath by a duly authorized representative. Each answer should include all knowledge in the possession of all officers, directors, members, associate members, advisors, agents, employees, consultants, and counsel for Intervenor.

In answering the interrogatories and in responding to the request to produce, please recite the interrogatories or request preceding each answer. These interrogatories and this request to produce shall be continuing, and, if after answering or responding, additional information or documents are obtained, please update the answer and response with such additional information. The term "documents" shall include, without limitation, the following: originals and copies (carbon, photographic, microfilm or otherwise) of all writings, correspondence, minutes, memoranda, reports, notes, diaries,

messages, telegrams, letters, books, ledgers, photographs, pictures, films, drawings, sketches, blueprints, data sheets, publications, advertisements, brochures, pamphlets, leaflets, contracts and/or other written material of whatsoever kind known to or in control or possession of Intervenors, their attorneys, members, consultants, officers, contractors, agents, or other representatives. In the event any document requested in these interrogatories has been destroyed or is unavailable, describe in detail the reasons therefor.

Interrogatories and Request to Produce

- 1) Please set forth Intervenors' understanding of the remaining issues pending before the Licensing Board.
- 2) What is the basis for Intervenors' description of such issues?
- 3) What is Intervenors' position with respect to such issues?
- 4) What is Intervenors' basis for such position?
- 5) Please list all documents and/or studies relied upon in support of Intervenors' position.
- 6) Have Intervenors undertaken any research and/or conducted any studies with regard to the remaining issues? If so, please describe the nature of such research and/or studies and provide specific reference to and copies of documents relied upon in such research and/or studies.

7. Have Intervenors contacted any individual and/or group with regard to the remaining issues? If so, please identify and indicate the reason for contacting any named individual and/or group, the date of the contact and the individual and/or group response.
- 8) With respect to individual and/or group which Intervenors may have contacted, have they prepared any documents, undertaken any research and/or conducted any studies upon which Intervenors will rely? If so, please describe and provide copies.
- 9) Do Intervenors plan to participate in the upcoming hearings with regard to the remaining issues? If so, please set forth the substance of Intervenors' participation.
- 10) Do Intervenors plan to file testimony in the upcoming hearings pursuant to 10 CFR §2.743(b). If so, who will sponsor (i.e., witness) such testimony?
- 11) Please identify any witness which Intervenors plan to call at the upcoming hearing, and provide a summary of their educational and professional background. Also, please set forth any other information bearing upon their qualifications to testify.
- 12) If Intervenors plan to call witnesses at the upcoming hearing, please indicate with specificity the nature of their testimony. In addition, please list and provide copies of documents which they rely upon with respect to the subject testimony. Also, please state whether

such individuals have undertaken any research, conducted any studies and/or contacted any individuals and/or groups with reference to their testimony. If so, please describe and provide copies.

- 13) Are Intervenor's of the view that sites obviously superior to the Perkins site exist for the construction and operation of a nuclear power plant similar to Perkins? If so, list specific sites and please furnish any analysis which compares Perkins to sites considered obviously superior to Perkins.
- 14) If Intervenor's are of the view such sites exist, please set forth the basis for such conclusion.
- 15) What criterion do Intervenor's consider to be the most important with respect to alternate site selection? Please explain the basis for such criterion selection.
- 16) What other criteria do Intervenor's consider to be important with respect to alternate site selection? Please explain the basis for such criteria.
- 17) Have Intervenor's visited sites other than Perkins? If so, please list.
- 18) How long have Intervenor's considered sites other than Perkins as viable alternatives. Please provide documents to support this response.
- 19) Have Intervenor's reviewed the documents of the Applicant relative to sites other than Perkins? If not, why not?

If so, please answer the following:

- a. Do Intervenors agree with the content of such documents?
- b. Are any facts contained therein erroneously stated? If so, what are the correct facts?
- c. Has any pertinent information been omitted? If so, please specify such information.
- d. Is there any error in the methodology employed? If so, please explain.
- e. Provide documents reflecting Intervenors' analysis of such document.

20) Have Intervenors reviewed the documents of the NRC Staff relative to sites other than Perkins? If not, why not?

If so, please answer the following:

- a. Do Intervenors agree with the content of such documents?
- b. Are any facts contained therein erroneously stated? If so, what are the correct facts?
- c. Has any pertinent information been omitted? If so, please specify such information.
- d. Is there any error in the methodology employed? If so, please explain.
- e. Provide documents reflecting Intervenors' analysis of such document.

21) Have Intervenors obtained any documents from the State of North Carolina relative to site selection subsequent

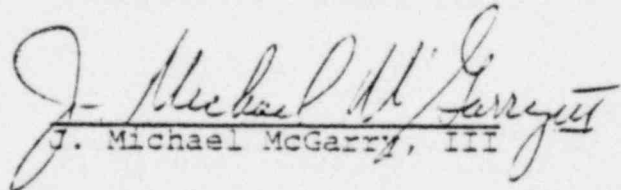
to the conclusion of the environmental phase of the evidentiary hearing which addressed alternate sites on April 29, 1977? If so, please submit copies and answer the following:

- a. Do Intervenors agree with the content of such documents?
  - b. Are any facts contained therein erroneously stated? If so, what are the correct facts?
  - c. Has any pertinent information been omitted? If so, please specify such information.
  - d. Is there any error in the methodology employed? If so, please explain.
  - e. Provide documents reflecting Intervenors' analysis of such document.
- 22) What local, state or federal officials have Intervenors contacted with respect to consideration of sites other than Perkins?
- 23) In light of the lapse of time since the initial intervention, please confirm whether the respective intervening participants remain active participants in this proceeding. If not, please explain.
- 24) Please list the date of the last meeting of the respective intervening participants regarding the issues presently under consideration.
- 25) Please state whether all of the respective intervening participants are aware of the position taken by Intervenors in response to these interrogatories.



- 26) Which, if any, of the respective intervening participants assisted in the preparation of the response to these interrogatories? Please list specific names.
- 27) Have Intervenors attended any local, state or federal meetings relative to the subject of alternate sites in general? If so, please list the time, place, subject matter and principal spokesman.
- 28) Have Intervenors attended any local, state or federal meetings relative to the subject of sites alternate to Perkins? If so, please list the time, place, subject matter and principal spokesman.
- 29) Have Intervenors attended any local, state or federal meetings relative to the subject of the Yadkin River in general? If so, please list the time, place, subject matter and principal spokesman.
- 30) Have Intervenors attended any meeting sponsored by knowledgeable authorities (by training and/or experience) in power plant siting? If so, please list the time, place, subject matter and principal spokesman.

Respectfully submitted,

  
J. Michael McGarry, III

Of counsel:

William L. Porter, Esq.  
Associate General Counsel  
Duke Power Company

December 15, 1978

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Interrogatories to Intervenor and Requests to Produce", dated December 15, 1978 in the captioned matter, have been served upon the following by deposit in the United States mail this 15th day of December.

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Chairman, Atomic Safety  
and Licensing Board  
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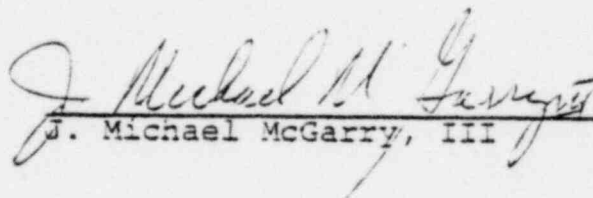


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