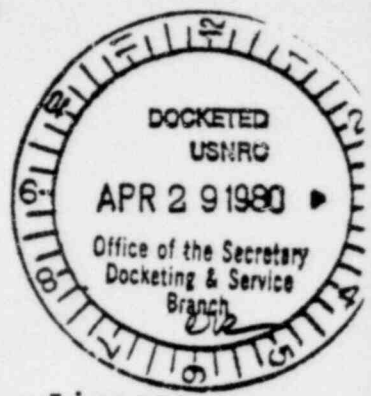


4/24/80

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
DAIRYLAND POWER COOPERATIVE)
(La Crosse Boiling Water Reactor))

Docket No. 50-409
Full Term Operating License

INTERVENORS' RESPONSE TO STAFF INTERROGATORIES

1. Intervenors have not engaged any persons to appear as expert witnesses at said hearings.

5. At what point do airborne radionuclides stop? This question seems to be based on the same assumptions that the threshold theory of radiation are based on.

6. The doses received by employees at LACBWR were discussed in the Spent Fuel Pool evidentiary hearing held in October of 1979.

12. Within this context the words have different meanings. Combined refers to airborne coal dust and radionuclides combining to cause the radionuclides to fall in a smaller radius at higher concentrations.

13. It is our opinion that very little research has been done on coal-nuclear synergisms and their effects and the burden of proof lies with the promoters and owners of the nuclear machines.

14. Same as 13.

16. At the time contention 19 was written two years ago intervenors were aware that several significant retrofits had been performed in the recent history of LACBWR. Given LACBWR's design and operational difficulties, the intervenors assumed the Systematic Evaluation Program would necessitate further retrofits.

Since that time DPC has been ordered to make several retrofits. The most significant retrofits thus ordered by the NRC include liquefaction corrections and TMI-2 retrofits as ordered by NUREG 0578.

18. At the time that contention 19 was written LACBWR was suffering long down time and poor operating capacity, due mainly to fuel failure. In the past two years LACBWR'S capacity factor has remained very low. There have been several indicators that changes required by NUREG 0578 Category B will require long down time to implement.

19. Low megawatt hours of cumulative output refers to the low output (in KW/hrs) produced by LACBWR as compared to its potential.

20. CREC contends that spent fuel storage costs would show up as benefits in the C/B ratio once any investments are made.

21. Contrary to NRC staff assumptions, as stated in the Final EIS, CREC believes that LACBWR fuel and maintenance costs will rise faster than non-nuclear replacement power, especially if that replacement were conservation.

22. Any decommissioning has a negative effect on the cost benefit ratio, and no specificity is required. However, it should be noted that decommissioning is a cost that is essentially non-productive and thus taxes consumers without any benefit. Recent plans made by DPC to phase out LACBWR by 1990 only makes it more likely that future consumers will find reflected in their rates costs associated with a non-productive facility.

24. Yes. Power plants do not ordinarily have rate structures.

25. Intervenors presently do not possess any economic models that would allow us to hazard a guess as to how much demand would be decreased. However, the basis for our belief is the law of economics which states that the more one pays for a commodity or service, the less one wants of such a service or commodity. That this law holds true can be seen only too clearly in the decreasing rate of growth of electrical consumption in the past several years.

26. DPC still has an advertising budget and a rate structure that discriminates against small users of electricity. The monthly REC newsletter chastises conservationists and environmentalists while promoting the "live better electrically" motto.

Note: It should be assumed that any questions that remain unanswered may be supplemented in the future, but at this time are unanswerable.

No nukes,

Anne K. Morse
George R. Nygaard

Anne K. Morse and
George R. Nygaard
for the

Coulee Region Energy Coalition

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

DAIRYLAND POWER COOPERATIVE)
(La Crosse Boiling Water Reactor))

Docket No. 50-409
(FTOL License Amendment)

CERTIFICATE OF SERVICE

I hereby certify that copies of "INTERVENORS RESPONSE TO STAFF INTER-ROGATORIES" have been served by U.S. mail, first class, this 25th day of April, 1980.

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