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UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

06/16/73

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
TOLEDO EDISON COMPANY AND THE)	
CLEVELAND ELECTRIC ILLUMINATING)	Docket No. 50-346
COMPANY)	
)	
(Davis-Besse Nuclear Power Station))	

AEC REGULATORY STAFF'S INTERROGATORIES,
REQUESTS FOR PRODUCTION OF DOCUMENTS, AND
REQUESTS FOR ADMISSIONS TO INTERVENOR,
COALITION FOR SAFE ELECTRIC POWER

Pursuant to the provisions of the Special Prehearing Conference Order dated May 31, 1973, and of 10 CFR §§ 2.740b, 2.741 and 2.742, the AEC regulatory staff propounds the following interrogatories, requests for production of documents, and requests for admissions to the Intervenor, Coalition for Safe Electric Power:

1. With regard to Issue 1, does the Intervenor contend that there exist methods to reduce, or which could be expected to reduce, the electrical demand within the service areas of the Ohio Edison Company, the Cleveland Electric Illuminating Company, and the Toledo Edison Company by 872 MWe or more?
 - a. If so, please enumerate the methods for such conservation.

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- b. With regard to each method enumerated in 1a., give the projected decrease in base load demand if that method were adopted.
- c. Have any of the methods, as described above, been implemented by any State Public Service Commission? If so, identify each such method.
- d. Has the Coalition determined the probable impact on industrial growth or farm modernization in the Northern Ohio area if the method of conservation of energy, as described by Coalition, is implemented? If so, describe that impact for each such method.
- e. Has the Coalition determined the probable impact on per capita income of individuals who would be affected by the conservation of energy? If so, describe that impact for each such method.
- f. Has the Coalition determined the probable impact on the per capita electrical consumption within the electrical distribution areas involved? If so, will the impact on low income families be greater than that on high income families?
- g. Would any of the methods of conservation of energy described by the Coalition require changes in building codes? If so, describe each such method, the type of changes which would be required, and the agency that would be required to carry out these changes.

- h. What studies have been made to determine if any of the methods of conservation of energy, as proposed by the Coalition, require changing regional development plans? Please relate each such study to each such method. What studies have been made to determine if these changes would be readily adopted?
 - i. Does the Coalition believe that the conservation of energy is related only to the reduction or the alteration of the subject matter of commercial advertisements by the applicants?
 - j. Please furnish the name, affiliation, and professional qualifications of any witness the Coalition will call on the above matters dealing with Issue 1.
 - k. Identify the documents, references, memoranda, correspondence, and notes which the Coalition or its witnesses possess that are related to the methods listed by the Coalition for the conservation of energy. Please identify each item as specifically as possible, and make those documents available for copying which are not otherwise readily available.
2. By Issue 2, does the Coalition contend that operation of the Davis-Besse facility will cause, or contribute to, high lake levels, severe lake storms, or flooding in the vicinity of the facility? If so, in what respect?

3. By Issue 2, does the Coalition contend that the facility will not shut-down if the cooling tower becomes inoperative due to storm damage?
 - a. If so, what are the bases for that contention?
 - b. If so, what will be the operational flow pathway for condenser cooling water?
 - c. If so, please furnish the name, affiliation, and professional qualifications of any witnesses the Coalition will call on this issue.

4. With regard to Issue 3, what is the particular situation around the Davis-Besse plant that results in the potential for greater environmental contamination than contemplated by section 7.2.2 of the Final Environmental Statement?
 - a. Specify the extent of the geographical area referred to be the phrase "around the Davis-Besse facility".

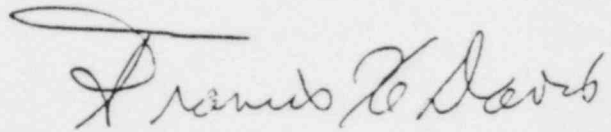
- b. Specify the atmospheric and other physical characteristics that make the particular situation around the Davis-Besse facility different from normal environs.
 - c. Please furnish the name, affiliation, and professional qualifications of any witnesses the Intervenor will call on this issue.
5. With regard to Issue 4, does the Coalition contend that the use of a figure other than 0.25 percent of failed fuel in computing a source term was necessary to obtain a realistic radiological calculation?
- a. If so, what does the Coalition contend is a reasonable fuel failure rate?
 - b. If so, what is the basis for that contention?
 - c. If unable to specify an exact fuel failure rate, please specify the nuclear plant and its experienced fuel failure rate that the Coalition believes should be used for comparison with this facility.
 - d. Why does the Coalition contend that the above fuel failure rate is comparable to the probable rate for the Davis-Besse plant?
 - e. In answering the above questions relating to Issue 4, provide citations for the contentions.
 - f. Please furnish a copy of any of the above references not published.
 - g. Please furnish the name, affiliation, and professional qualifications of any witnesses the Coalition intends to call on this issue.

6. Please provide the name, affiliation, and professional qualifications of any witness the Coalition will call on Issue 5.
7. With regard to Issue 6, does the Coalition contend that the AEC did not include in the source term given in the FES (used in determining the expected effects from the released radioactivity) its estimates considering the effects of aging of the reactor?
 - a. If so, please provide any calculations or other references bearing upon that contention.
 - b. If so, what other consideration of aging should the FES have contained?
 - c. Please provide the basis for any answer to 7b.
 - d. If so, please provide the name, affiliation, and professional qualifications of any witness the Coalition will call on this issue.
8. With regard to Issue 7, will the Coalition admit that the population projections in Table 5.2 are adequate for estimating the radiological effects to man from radiological releases?
 - a. If not, what are the correct population projections? What are the bases for these projections?
 - b. Please provide the name, affiliation, and professional qualifications of any witness that the Intervenor intends to call on this issue.

9. With regard to Issue 8, does the Coalition contend that Section 3 of the FES, as supplemented by Section 12 of the FES, does not adequately identify the radioactive effluents, the thermal effluents, the chemical effluents (including any detergents), and the dissolved and suspended solids which will probably be released, and the resultant biological oxygen demand (B.O.D.), due to all operations of the Davis-Besse Nuclear Power Plant?
 - a. If so, what are the effluents, and their sources, that the Coalition contends should have been used in the FES?
 - b. If so, specify how the resultant B.O.D. differs.
 - c. Specify all effluents that the Coalition contends are in violation of the non-degradation clause of the Water Quality Standards of the State of Ohio.
 - d. Please furnish the name, affiliation, and professional qualifications of any witness the Coalition intends to call on this contention.

10. With regard to Issue 8, does the Coalition contend that Sections 2, 4 and 5 of the FES, as supplemented by Section 12 of the FES, do not adequately discuss the probable environmental impact of all operations of the Station on the fish, wildlife, spawning grounds, aquatic biota, their habitat and the supporting ecosystem?
 - a. If so, identify the probable environmental impacts which were not properly assessed and the basis for those evaluations.
 - b. If so, please supply any reference for this contention not readily available.

- c. Please supply the name, affiliation and professional qualifications of any witness the Coalition intends to call on this issue.
11. With regard to Issue 8, does the Coalition contend that Sections 2, 4 and 5 of the FES, as supplemented by Section 12 of the FES, do not adequately evaluate the probable environmental impacts of all operations of the Davis-Besse plant on water supplies and the recreational aspects of Lake Erie?
 - a. If so, what impacts are not adequately evaluated?
 - b. Please supply copies of any references for this contention not available in the open literature of the field.
 - c. Please supply the name, affiliation, and professional qualifications of any witness the Coalition intends to call on this contention.
12. With regard to Issue 8, will the Coalition admit that Toledo Edison Company has a Water Quality Certificate issued by the Ohio Water Pollution Control Board for the State of Ohio on March 21, 1972, applicable to the Davis-Besse facility?
 - a. Does the Coalition contend that said certificate is not valid?
 - b. If so, please state the reasons for the invalidity.
 - c. Please supply the name, affiliation, and professional qualifications of any witness that the Coalition will call on this contention.

A handwritten signature in cursive script, reading "Francis X. Davis". The signature is written in dark ink on a light background.

Francis X. Davis
Counsel for AEC Regulatory Staff

Dated at Bethesda, Maryland
this 16th day of June, 1973.

UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

In the Matter of)
)
TOLEDO EDISON COMPANY AND THE)
CLEVELAND ELECTRIC ILLUMINATING) Docket No. 50-346
COMPANY)
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(Davis-Besse Nuclear Power Station))

CERTIFICATE OF SERVICE

I hereby certify that copies of "AEC Regulatory Staff's Interrogatories, Requests for Production of Documents, and Requests for Admissions to Intervenor, Coalition for Safe Electric Power," dated June 16, 1973, in the captioned matter, have been served on the following by deposit in the United States mail, first class or air mail, this 16th day of June, 1973:

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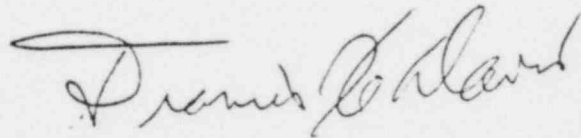
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A handwritten signature in cursive script, appearing to read "Francis X. Davis". The signature is written in dark ink and is positioned above the printed name and title.

Francis X. Davis
Counsel for AEC Regulatory Staff