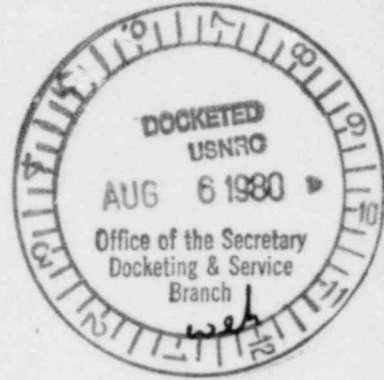


Dated: August 4, 1980

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))

RESPONSE OF GENERAL ELECTRIC COMPANY
TO INTERVENOR'S INTERROGATORIES,
FIRST SET, DIRECTED TO APPLICANT

Applicant General Electric Company ("General Electric") responds as follows to the "Intervenor's Interrogatories, First Set, Directed to Applicant," served on or about July 14, 1980 by intervenor, PEOPLE OF THE STATE OF ILLINOIS, by WILLIAM J. SCOTT, Attorney General for the State of Illinois ("Intervenor").

OBJECTIONS TO INTERVENOR'S
PURPORTED INSTRUCTIONS

"For each person so identified:

"A. Give such person's name, home address and telephone number, and business address and telephone number.

"B. Give such person's academic professional [sic] credentials including degrees received, fellowships, professional societies and professional honors.

"C. Give such person's present title, job responsibilities and duties, number of years in such position, and name of such person's supervisor.

8008080 4/7

C

"D. List such person's previous work experience including:

- (i) Name of position and employer;
- (ii) Number of years in such position;
- (iii) Duties and responsibilities in one's such position;
- (iv) Name of such person's supervisor while in that position.

"E. State whether or not such person has given or prepared any oral or written statements regarding each area or areas for which such person has been identified.

"F. For each such statement identified in E:

- (i) Identify such statement;
- (ii) State whether such statement was written or oral;
- (iii) State when, by whom and to whom such statement was made or submitted;
- (iv) If this statement was written, attach a true and accurate copy of it to the answer herein."

Response: General Electric objects to ¶ A to the extent it seeks persons' home addresses and telephone numbers on the grounds that such information is personal to the individuals involved and is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery allowed in these proceedings pursuant to the rules and regulations of the Nuclear Regulatory Commission, 10 C.F.R. § 2.740(b).

General Electric objects to ¶¶ B, C, D, E and F to the extent that, in conjunction with the interrogatories into which they are incorporated, they seek unnecessary and burdensome detail, information that is not "available to the party" within the meaning of 10 C.F.R. §2.740 b (a), and information that is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

General Electric further objects to paragraphs E and F on the further ground that the term "statement" is vague, ambiguous and undefined. To the extent that the Intervenor through such terms and these paragraphs seeks discovery of communications and/or documents protected by the attorney-client privilege, the work-product doctrine and/or 10 C.F.R. §2.740(b)(2), General Electric objects on those grounds also. General Electric further objects that ¶ F(iv) is not an instruction for answering an interrogatory, but is in fact an improper document request, and General Electric objects that it seeks to impose upon General Electric duties in excess of those permitted by either 10 C.F.R. §2.740 b (governing interrogatories) or 10 C.F.R. §2.741 (governing requests for production of documents).

Resumes of David M. Dawson and Eugene E. Voiland are attached as General Electric's response to the Intervenor's Instructions.

In responding to the Interrogatories propounded with the above instructions, General Electric does not waive any of the foregoing objections to such instructions. Indeed, General Electric hereby expressly incorporates into each of its responses to the interrogatories the objections applicable to each instruction applicable to such interrogatory.

RESPONSES TO INTERROGATORIES

"INTERROGATORY NO. 1: Identify the person or persons who are employed or are representatives of the General Electric Company who have knowledge about the following:"

Response: General Electric objects to the quoted preamble to Interrogatory No. 1, and to each of the sub-parts to which it applies, on the grounds that the term "knowledge" is vague, ambiguous and undefined, and on the ground that the phrase "are employed or are representatives" is overly broad in light of the fact General Electric has hundreds of thousands of employees. General Electric objects that these terms in combination with each other and the subparts that follow make the interrogatory incapable of being practicably answered as propounded, and General Electric states that it is therefore limiting its response to responsible management personnel in the respective areas.

"A. Any interactions between the Department of Energy or the Nuclear Regulatory Commission and General Electric regarding the use of the Morris operation as a federal repository for spent fuel or any other future use."

Response: General Electric objects that Subpart A of Interrogatory No. 1 violates the Board's "Order Ruling On

Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is not relevant to the subject matter involved in the proceeding pursuant to the Board's Order, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"B. Any plans, programs, proposals for Federal Government use of the Morris facility as a federal repository for spent fuel."

Response: General Electric objects that Subpart B of Interrogatory No. 1 violates the Board's "Order Ruling on Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is not relevant to the subject matter involved in the proceeding pursuant to the Board's Order, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"C. Security Plans"

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart C as follows:

E.E. Voiland.

"D. License Amendments"

Response: General Electric objects to Subpart D on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or to this subpart, General Electric answers Interrogatory No. 1 Subpart D, as properly limited, as follows:

For SNM License 1265,
D.M. Dawson.

"E. Emergency Plans"

Response: Without waiving any of the objections stated in response to the purported instructions, and without

waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart E as follows:

E.E. Voiland.

"F. Liaison with general population and emergency facilities and state agencies dealing with emergency and evacuation plans."

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart F, as properly limited, as follows:

E.E. Voiland, with the exception of liaison with the general population. General Electric has no liaison with the general population regarding emergency and evacuation plans or emergency facilities in the area of the Morris Operation.

"G. Radiation monitoring or testing."

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart G as follows:

E.E. Voiland.

"H. Any environmental appraisals or analyses prepared with regard to the use of the Morris facility as a spent fuel storage facility from 1979 forward."

Response: General Electric objects to Subpart H on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or this subpart, General Electric answers Interrogatory No. 1 Subpart H, as properly limited, as follows:

D.M. Dawson, for the Environmental Impact Appraisal Related to The Renewal of Material License SNM-1265 for the Receipt, Storage and Transfer of Spent Fuel at Morris Operation, General Electric Co., Docket No. 70-1308, published: U.S. Nuclear Regulatory Commission, Division of Fuel Cycle and Material Safety, Washington, D.C. June 1980.

"I. Any Interactions with Nuclear Regulatory Commission in regard to the license renewal application."

Response: General Electric objects to Subpart I on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or this subpart, General Electric answers Interrogatory No. 1 Subpart 1 as follows:

D.M. Lawson.

"J. Any interactions with NRC personnel in regard to current operation of Morris."

Response: General Electric objects to Subpart J on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore

beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving the objections stated in response to the purported instructions, or the objections applicable to all subparts of Interrogatory No. 1, or to this subpart, General Electric answers Interrogatory No. 1 Subpart J as follows:

D.M. Dawson and E.E. Voiland.

"K. Any interactions with NRC in regard to the License Amendment requested [sic] January 18, 1980."

Response: See Response to Interrogatory 5.

"L. Amount of fuel projected to be stored during license period."

Response: Without waiving any of the objections stated in response to the purported instructions, or any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart L as follows:

D.M. Dawson.

"INTERROGATORY NO. 2: Identify any officials or representatives of the Nuclear Regulatory Commission with whom GE has had contact in regard to the license renewal proceeding."

Response: General Electric objects that Interrogatory No. 2 is vague, ambiguous and overly broad. Without waiving those objections or the objections stated in response to the purported instructions, and limiting its response to responsible General Electric management personnel, General Electric answers Interrogatory No. 2 as follows:

To the best of General Electric's knowledge, the U.S. Nuclear Regulatory Commission personnel with whom General Electric had contact in regard to the renewal of Materials License SNM-1265, Docket No. 70-1308 were as follows:

A.T. Clark
R.E. Cunningham
F.M. Empson
C.C. Peck
J.P. Roberts
M.U. Rothschild
L.C. Rouse
B.S. Spitalny
R.W. Starostecki
S.A. Treby

"INTERROGATORY NO. 3: Identify any plans or proposals for change in use of the Morris facility which would necessitate a license amendment to the existing license."

Response: General Electric objects that the interrogatory is vague and ambiguous and further objects that the entire interrogatory violates the Board's "Order Ruling on Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is irrelevant to the subject matter involved in the proceeding pursuant to the Board's Order because the subject matter of this interrogatory is beyond the scope of the licensing proceeding, is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"INTERROGATORY NO. 4: Identify all experts to be used as consultants and for witnesses, areas of expertise and contentions to be addressed."

Response: Without waiving any of the objections stated in response to the purported instructions, General Electric responds that as of the date of these responses to these interrogatories, it has not selected or retained any experts to be used as consultants or witnesses regarding this licensing proceeding. General Electric will amend and supplement this response when and in the event that it selects or retains any such expert.

"INTERROGATORY NO. 5: Describe the License Amendment requested on January 18, 1980 and the reasons therefore."

Response: No license amendment was requested on January 18, 1980. In the letter of June 12, 1980 to Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission from D.M. Dawson, Manager, Licensing and Transportation, General Electric Company, reference to a January 18, 1980 amendment request was made in error. The date in paragraphs one and two of that June 12, 1980 letter should have been January 23, 1980. Notification of the error was transmitted to the NRC and distributed to the service list for this proceeding on July 29, 1980. On January 31, 1980, the amendment request of January 23, 1980 was distributed to the service list for this proceeding. That distribution contained a description of the requested amendment and the reasons therefor.

"INTERROGATORY NO. 6: In regard to Revision C2 of NEDO-21326 Describe [sic] in detail."

Response: As a general response to this entire interrogatory, General Electric states as follows:

The purpose of the proposed amendment of June 12, 1980, "Revised Amendment Request Regarding Changes, Tests and Experiments", is to provide General Electric the same flexibility to make changes in plant and procedures and conduct tests and experiments as is provided in other existing and proposed regulations. As of August 1, 1980, the amendment had not been issued by the NRC.

In addition to provisions to make changes and to perform tests and experiments, the proposed amendment request incorporates the existing provision of 10 CFR 70.32(e) regarding changes which may affect the physical security plan. This provision was incorporated into the request for purposes of fully delineating the processing of all changes. The proposed amendment is intended to make clear the review criteria that must be followed in making contemplated changes and in performing tests.

The changes, tests and experiments which are currently planned are listed below in the response to Interrogatory 6A. The types of changes contemplated in the plant or procedures as they are presently described in the Consolidated Safety Analysis Report, NEDO-21326C (hereinafter "CSAR") would be those which are related to improvements and refinements in the facility and procedures and therefore are related to fuel storage in the existing facility. Tests and experiments will be tests and experiments conducted to gain knowledge of parameters of and those affecting fuel in storage. As explained

in the proposed amendment, activities which are significantly different from present activities, or could produce an effect significantly different from present activities, will be reviewed by the NRC under a General Electric request for approval.

The situation under the proposed amendment if issued will be no different than the situation presently existing at Morris. General Electric is currently permitted to make changes and perform tests that do not require revision of the Operation Specifications (CSAR, Ch. 10) and do not represent an unreviewed safety or environmental issue. The request only seeks to clarify the process to be followed.

"A. All changes, tests and experiments proposed or projected."

Response: General Electric answers Interrogatory No. 6

Subpart A as follows:

Changes, tests and experiments proposed or projected are the following:

Changes

Redesigned unloading pit doorway guard at the unloading basin entrance to the fuel storage basin.

Tests and experiments

1. Measurements of gamma radiation adjacent to individual fuel bundles.
2. Measurements of thermal output of individual fuel bundles and transfer rate of radioactive material from fuel bundles to the basin water.

"B. Which changes in plant, procedures, tests, and experiments related to receipt, storage and transfer of spent fuel are proposed to be performed without prior approval of NRC."

Response: General Electric answers Interrogatory No. 6

Subpart B as follows:

No decision has been made as to whether any of the proposed or projected changes, tests or experiments described in the response to INTERROGATORY No. 6A are such that they may be performed, under the criteria defined in the proposed amendment without prior approval of the NRC.

"C. Any other types of changes in plant operation, procedures, tests or experiments are [sic] proposed or projected to be performed without prior NRC approval."

Response: General Electric answers Interrogatory No. 6

Subpart C as follows:

None

"D. Who will make the determination that changes in plant operation, procedures, tests and experiments will not require a change in the Operation Specifications, Chapter 10 of NEDO-2132 6C, does [sic] not involve unreviewed safety or environmental issues and does [sic] not decrease the effectiveness of the physical security plan; what standards will be applied to make this determination; when will that determination be made."

Response: General Electric answers Interrogatory No. 6

Subpart D as follows:

The determination that changes in plant operations and procedures and tests and experiments will not require a change in the Operation Specifications (CSAR, Ch. 10) and will not involve unreviewed safety or environmental issues will be made by the Morris Operation Plant Safety Committee, with concurrence required by the Manager - Morris Operation and the Manager - Licensing and Transportation. The determination that changes in the physical security plan do not decrease the effectiveness of the plan will be made by

the Manager - Morris Operation with concurrence required by Manager - Licensing and Transportation. The standards applied in making the determination are stated in the proposed amendment. The determination will be made prior to implementation of the change, test or experiment.

"E. What type of NRC review of these changes listed above is anticipated."

Response: General Electric answers Interrogatory No. 6

Subpart E as follows:

It is not known by General Electric what type of NRC review will be made of changes which General Electric has determined do not require prior NRC approval.

"F. What type of reports of the changes shall be made to the NRC, to State agencies, to shareholders and to the public; when will these reports be issued."

Response: General Electric answers Interrogatory No. 6

Subpart F as follows:

Annual reports of the changes which General Electric has determined do not require prior NRC approval will be made and issued according to the proposed amendment. State agencies, shareholders and the public may review the annual reports in either the NRC public document room in Washington, D.C. or in the local public document room in the City of Morris public library.

"G. Will the NRC or any other agency be notified of the inception of any changes, as listed above."

Response: General Electric objects to Subpart G of Interrogatory No. 6 on the grounds that it is vague, ambiguous and redundant. Without waiving any of the objections stated in response

to the purported instructions and without waiving any of the objections applicable to this subpart of Interrogatory No. 6, General Electric answers Interrogatory No. 6 Subpart G as follows:

Regarding those changes, tests or experiments that may be undertaken without an amendment to the license, General Electric will not be required, under the conditions of the proposed amendment, to notify the NRC or any other agency prior to the commencement of the changes, tests or experiments.

"H. Identify NRC regulation [sic] that permits changes in plant operation or procedure without prior NRC approval."

Response: General Electric answers Interrogatory No. 6 Subpart H as follows:

The NRC regulation that permits changes to the physical security plan without prior approval is §70.32(e) Conditions of licenses, Part 70, Domestic Licensing of Special Nuclear Material, Title 10, Code of Federal Regulations.

"INTERROGATORY NO. 7: Identify plans for future storage of spent fuel until the year 2000 including:

- A. Estimated shipment date(s),
- B. Number of assemblies,
- C. Point of origin; owner
- D. Mode of transportation
- E. Number of years of storage estimated."

Response: General Electric answers Interrogatory No. 7

as follows:

Current plans for future storage of spent fuel not yet received at the Morris facility are as follows:

- A. The estimated shipment dates are August 1, 1980 and thereafter at an estimated rate of two assemblies per week until all assemblies are shipped.
- B. The number of assemblies is ninety-one (91).
- C. The point of origin is San Onofre Nuclear Station, Unit 1, San Diego County, California. To the best of General Electric's knowledge and belief, the owners are Southern California Edison Company and San Diego Gas and Electric Company.
- D. The mode of transportation is truck cask.
- E. The period of storage estimated is through December 1986.

"INTERROGATORY NO. 8: In regard to Spent Fuel Storage Problems at Morris:

Response: General Electric objects to the improper assumption and characterization that there have been "problems" regarding the storage of spent fuel at Morris.

"A. Have any fuel rods ruptured, exploded, or otherwise leaked radiation while in storage? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart A as follows:

No fuel rods have ruptured or exploded. There is a slow transfer of certain radioactive materials from some of the fuel to the basin water. This condition is described in "Operating Experience Irradiated Fuel Storage, Morris Operation", NEDO-20969B, §3.3.1 (May 1978) and the CSAR, §5.52.

"B. Have you experienced problems with warped or damaged fuel assemblies in storage? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart B as follows:

There has been no evidence of warping or damage of fuel bundles in storage and therefore no problems have been experienced.

"C. Have you experienced problems with damaged racks? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart C as follows:

There has been no damage to the present storage system and therefore no problems have been experienced. Three positions in the temporary racks in use between 1972 and 1975 were slightly damaged prior to installation. These three positions were never

used. The temporary racks were replaced by the present storage system in 1976.

"D. Has the liner of the spent fuel pool ever leaked? If yes, please state total amount of coolant lost, ultimate destination of coolant that leaked, and cause of leak."

Response: General Electric answers Interrogatory No. 8

Subpart D as follows:

There is no evidence of leakage through the stainless steel liner except for leakage that occurred when the liner was penetrated as a result of the cask-tip incident, which is described in the CSAR, §8.3, and the leakage that has occurred intermittently at the seal in the expansion gate, which is described in Operating Experience, Irradiated Fuel Storage - Morris Operation, NEDO-20969B2, §2.3.2.

"E. Has the pool radioactive waste system ever failed? If yes, please explain."

Response: General Electric objects to Subpart E of this interrogatory on the grounds that it is vague and ambiguous. Without waiving these objections, General Electric answers Interrogatory 8 Subpart E as follows:

The low activity waste vault (that stores radioactive materials collected by the pool cleanup system and the cask flush system) has never failed. The pool cleanup system (that removes radioactive materials from the pool water) has never failed to perform its function of maintaining water quality within the limits of the CSAR, Ch. 10.

"F. Has the pool coolant circulation system ever failed? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart F as follows:

There have been no failures of the function of the cooling system. The cooling system was damaged by freezing in an incident that occurred January, 1977. This incident is described in "Operating Experience, Irradiated Fuel Storage-Morris Operation," Morris, Illinois NEDO-20969B2, §3.2.2

"G. Have you had problems with "crud" buildup on the assemblies or in the pool? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart G as follows:

No

"H. Has the spent fuel pool ever been drained? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart H as follows:

No

"I. Has the radiation level [sic] of the spent fuel pool ever exceeded allowable limit? If yes, please explain."

Response: General Electric objects to Subpart I of this interrogatory on the grounds that it incorrectly assumes that there is an allowable limit for the radiation level of the spent fuel pool. Without waiving this objection, General Electric answers Interrogatory No. 8 Subpart I as follows:

The concentration of radioactivity in the spent fuel pool has

never exceeded the limit specified in the CSAR, Ch. 10.

"J. Have fuel assemblies ever been dropped during handling? If so, please list dates, number of assemblies dropped, and extent of damage, if any."

Response: General Electric answers Interrogatory No. 8

Subpart J as follows:

Fuel bundles have never been dropped outside their storage basket. However, on two occasions, October 11, 1972 and November 11, 1972, while placing a fuel bundle in a storage basket the fuel bundle became disengaged from the grapple allowing it to drop an estimated one foot onto the bottom of the storage basket. Examinations of the fuel bundle and baskets revealed that no damage was sustained. The fuel handling tools were redesigned in 1973 and no further fuel bundle drops have been experienced.

"K. Please describe any problems encountered in storing spent fuel not described in response to the above questions."

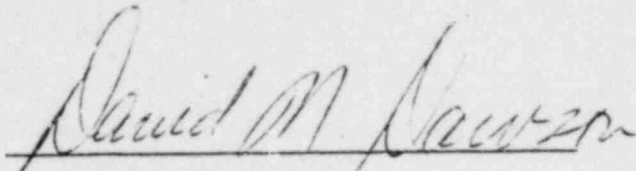
Response: General Electric objects that Interrogatory No. 8


Subpart K is vague and ambiguous and improper to the extent that it exceeds the scope of this proceeding and the limits upon discovery set forth in 10 C.F.R. §2.740. Without waiving any of the foregoing objections, General Electric answers Interrogatory No. 8


Subpart K as follows:

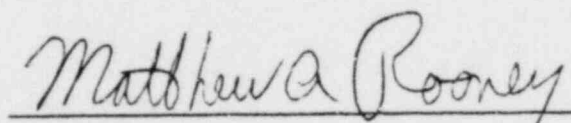
None

Respectfully submitted,
GENERAL ELECTRIC COMPANY


David M. Dawson


Eugene E. Voiland


Ronald W. Szwajkowski
One of Its Attorneys


Matthew A. Rooney
One of Its Attorneys

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David M. Dawson
General Electric Co.
175 Curtner Avenue
San Jose, CA 95125
408*925-6330

Academic:

Bachelor of Science, Physics, 1958, Washington and Lee University,
Lexington, VA

Graduate study, Physics, 1959, Vanderbilt University, Nashville, TN

Fellowship:

Atomic Energy Commission Fellowship, Radiological Physics 1958-1959,
Vanderbilt University and Oak Ridge National Laboratory.

Professional Memberships:

Member, Northern California Chapter of Health Physics Society

Member, American Nuclear Society Standards Subcommittee 8, "Fissionable
Materials Outside Reactors" 1966 to present.

Alternate American Nuclear Society Representative to American National
Standards Institute Committee N14, "Packaging and Transportation of
Fissile and Radioactive Materials" 1969 to present.

Registered Professional Nuclear Engineer, California, NU 2040, 1977

Employment:

May 1975 to Present

General Electric Company
Nuclear Energy Business Group
Spent Fuel Service Operation
Supervisor, J.E. Van Hoomissen, Manager, SFSO
Title: Manager, Licensing and Transportation

Responsible for NRC licensing of fuel storage facilities
irradiated fuel shipping casks and high density fuel storage
systems. Also responsible for overall transportation system
for irradiated fuel, including design of equipment and trans-
portation planning. Responsibilities include review of
designs of facilities and equipment to assure compliance with
regulatory requirements, preparation of license submittals,
promulgation of license conditions and require-
ments to operating and design components and review of compliance
with these conditions and requirements.

May 1974 to May 1975

General Electric Company
Nuclear Energy Division
Boiling Water Reactor Projects Department
Safety and Licensing Operation
Supervisor, L.S. Gifford, Manager Regulatory Operations
Title: Senior Engineer, Licensing

Responsible for liaison between headquarters project and operating reactor licensing personnel and AEC/NRC regulatory staff.

May 1970 to May 1974

General Electric Company
Nuclear Energy Division
Nuclear Fuel Manufacturing
Supervisor, H.H. Klepfer and others
Title: Manager, Nuclear Safety and Licensing

Responsible for establishing and maintaining radiological safety and criticality safety programs. Responsibilities included technical evaluation of designs of equipment and facilities to assure compliance with regulatory requirements, preparation of license submittals, promulgation of license conditions and regulatory requirements to operating and design components, review of compliance with these conditions and requirements, and development and implementation of nuclear safety programs.

September 1965 to May 1970

General Electric Company
Nuclear Energy Division
Nuclear Fuels Engineering
Supervisors, T. Trocki and others
Title: Criticality Safety Engineer

Responsibility for evaluation of the criticality safety of fuel manufacturing operations fuel development activities, fuel storage, and fuel transportation packages.

May 1962 to September 1965 (and June 1959 to November 1961)

Pratt and Whitney Aircraft Company
Connecticut Advanced Nuclear Engineering Laboratory (and
Connecticut Aircraft Nuclear Engine Laboratory)
Health and Safety Engineering Department
Supervisor: W.F. Patton and others
Title: Nuclear Safety Engineer (and Industrial Hygienist)

Responsible for evaluation, approval and review
for compliance with requirements of facilities and
equipment for fuel fabrication, fuel storage and fuel
development. Responsibilities included review of
fissile material and waste shipments for compliance
with requirements. (Responsible for providing services
for health physics, industrial hygiene and safety
engineering for areas handling radioactive materials).

November 1961 to May 1962

University of California
Lawrence Berkeley Radiation Laboratory
Health Chemistry Department
Supervisor: P.W. Howe
Title: Technical Coordinator

Completed training course in radiation safety and
transuranic element handling procedures.

Courses

Criticality and Criticality Safeguards	1960	University of California
Fast Reactor Technology	1967	General Electric
Nuclear Engineering Fundamental, Part II,	1968	General Electric
Nuclear Power Safety	1975	Georgia Institute of Technology

Papers

- "Criticality Safety in Fuel Handling at Reactor Sites", GE I&SE Seminar, 1972.
- "Health Physics Problems of Fuel Fabrication", North Carolina HPS, Meeting, 1972.
- "Incineration of Low Uranium Content Wastes", ANS Meeting, 1973, (with G. Sakash).
- "Moderation Control for Purposes of Criticality Safety", ANS Meeting, 1976.

Eugene E. Voiland
Morris Operation
General Electric Company
7555 E. Collins Road
Morris, IL 60450
815*942-5590

Academic:

Bachelor of Science, 1947, Seattle College, Seattle, WA

Graduate Study, Physical Chemistry, 1947-1951, University of
Notre Dame, Notre Dame, IN

Fellowship:

Atomic Energy Commission Pre Doctoral Fellowship in the Physical
Sciences, 1948-1950, University of Notre Dame.

Professional Memberships:

Member, American Nuclear Society

Member and Director, Chicago Section, American Nuclear Society

Member, American Association for the Advancement of Science

Other Memberships:

Public Member, Illinois Energy Resources Commission, Springfield, IL

Vice Chairman, Board of Directors, Three Rivers Manufacturers
Association, Joliet, IL.

Employment:

March 1975 to Present

General Electric Company
Nuclear Energy Business Group
Spent Fuel Services Operation (SFSO)
Supervisor, J.E. Van Hoomissen, Manager, SFSO
Title: Manager, Morris Operation

Responsible for overall management of Morris
Operation, General Electric's spent fuel receiving
and storage facility at Morris, Illinois and spent
fuel shipping containers (casks). Activities for
which he has management responsibility include:

operation of the spent fuel storage pools;
operation of general plant systems;
engineering design, fabrication, and installation services;
supporting services such as quality assurance and quality control, radiological and industrial safety, emergency responses, analytical laboratory, physical security and safeguards systems, and purchasing;
and field service activities related to use of the IF-300 cask at reactors.

Note: Additional responsibilities include maintenance of a formal management system of instructions, manuals, and procedures; administration of NRC Licenses and Certificates of Compliance; and assuring compliance with all applicable regulatory requirements.

December 1973 to March 1975

General Electric Company
Nuclear Energy Division
Midwest Fuel Recovery Plant
Supervisor, B.F. Judson, Manager Midwest Fuel Recovery Plant
Title: Manager, Safety and Quality Assurance

Responsible for site (AEC and State) licensing and compliance activities, radiological and industrial safety, quality assurance and nuclear materials management.

December 1971 to December 1973

Argonne National Laboratory
Chemical Engineering Division
Argonne, IL
Supervisors, R.C. Vogel, L. Burris
Title: Manager, Analytical Laboratory

Management of a diversified analytical laboratory, including, plutonium, mass spectrometric, x-ray, gas chromatographic and general chemical laboratories.

July 1968 to November 1971

Battelle Memorial Institute
Pacific Northwest Laboratories
Richland, WA
Supervisors, J.J. Cadwell, W.D. Richmond, W.D. Widrig
Title: Senior Research Associate

Technically responsible for Laboratory radioactive waste management activities. Representative for Battelle on the AEC Richland Operations/Contractor Waste Management Advisory Board. Special studies of various kinds.

October 1964 to July 1968

General Electric Company (through December 1964)
Battelle Northwest (from January, 1965)
Supervisors, W.H. Reas, M.T. Walling, D.R. deHalas
Title: Manager, Chemical Research Subsection

Managed diversified R&D organization comprising four units. Work primarily associated with nuclear field including work in (1) separations chemistry; solvent extraction, ion exchange, fission product recovery, nuclear waste processing and molten salt processes, (2) basic physical and inorganic chemistry of actinide elements, (3) remote analytical instrumentation and radiochemical analytical research, (4) hot cell complex used for recovery of ^{147}Pm , ^{237}Np , ^{238}Pu separation and purification and process demonstration and (5) personally served as BNW Program Director for site AEC Division of Isotope Development Programs. (105 scientists, engineers and technicians).

November 1961 to October 1964

General Electric Company
Hanford Atomic Products Operation
Reactor and Fuels Section
Supervisor, F.W. Albaugh
Title: Manager, Materials Research and Services Subsection

Managed 3-component organization performing (1) R&D in radiation effects and chemical reactions of nuclear graphite, (2) metallographic services and (3) metallurgical and physical testing of irradiated fuels and materials. (85 scientists, engineers and technicians).

July 1955 to November 1961

General Electric Company
Hanford Atomic Products Operation
Chemical Research and Development Section
Supervisor, W.H. Reas
Title: Supervisor, Heavy Element Chemistry Unit

July 1955 to November 1961 - cont'd.

Directed research to actinide element chemistry, separations, processes, ion exchange, solvent extraction and molten salt chemistry. (10-15 scientists and technicians).

October 1951 to July 1955

General Electric Company
Hanford Atomic Products Operation
Chemical Research and Development Section
Supervisors, O.F. Hill, W.H. Reas
Title: Research Scientist

Conducted research in nuclear fuel reprocessing, separations chemistry, solvent extraction and and isotope separation.

Papers

"Management of High Level Radioactive Wastes", Eighth Annual National Conference on Radiation Control, Springfield, Illinois, May 2-7, 1976.
"Control of Nuclear Fuel Storage Basin Water Quality by Use of Powdered Ion Exchange Resins and Zeolites", ASME Paper 77-JPGC-NE-15, ASME/IEEE Joint Power Generation Conference, Long Beach, California, September 18-21, 1977 (with L.L. Denio, D.E. Knowlton).
"Experience in Operation of the Morris Operation Storage Facility", American Nuclear Society Executive Conference on Spent Fuel Policy and Its Implications, Buford, Georgia, April 2-5, 1978.
Testimony before Illinois Legislature: "Experience in Operation of an Independent Fuel Storage Facility", June 7, 1979. "About Away-From-Reactor Spent Fuel Storage", August 29, 1979.
Testimony before California Energy Resources and Development Commission: "Experience in Operation of an Independent Fuel Storage Facility", March 10, 1977.
Various classified reports related to separations chemistry.

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

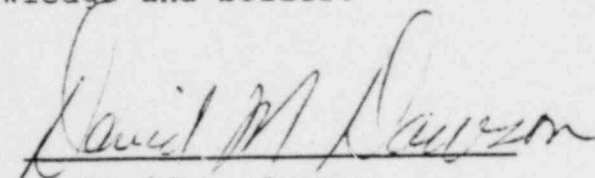
In the Matter of) Docket No. 70-1308
)
GENERAL ELECTRIC COMPANY) (Renewal of SNM-1265)
)
(GE Morris Operation Spent)
FUEL Storage Facility))

VERIFICATION OF DAVID. M. DAWSON

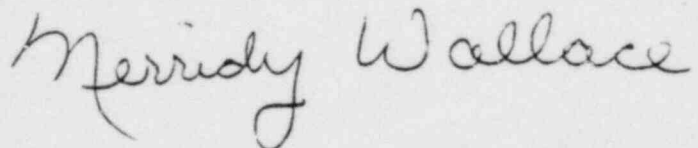
David M. Dawson, being duly sworn, deposes and says as follows:

1. That he is employed as Manager, Licensing and Transportation, General Electric Company, Spent Fuel Services Operation, San Jose, California, and that he is duly authorized to answer the interrogatories numbered 1C, 1D, 1E, 1F, 1G, 1H, 1I, 1J, and 1L; 2; 3; 6, 6B, 6C, 6D, 6E, 6F, 6G, 6H and 7 propounded by the State of Illinois under date of service of July 11, 1980.

2. That the above-mentioned and attached answers are true and correct to the best of his knowledge and belief.


David M. Dawson

Subscribed and sworn to before me this thirty-first day of July, 1980
in San Jose, County of Santa Clara, California.



My Commission expires April ²⁰~~21~~, 1981. mw



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

In the Matter of) Docket No. 70-1308
)
GENERAL ELECTRIC COMPANY) (Renewal of SNM-1265)
)
(GE Morris Operation Spent)
Fuel Storage Facility))

VERIFICATION OF EUGENE E. VOILAND

Eugene E. Voiland, being duly sworn, deposes and says as follows:

1. That he is employed as Manager, Morris Operation, General Electric Company, Morris, Illinois and that he is duly authorized to answer the interrogatories numbered 6A, 8 propounded by the State of Illinois under date of service of July 11, 1980.
2. That the above-mentioned and attached answers are true and correct to the best of his knowledge and belief.

Eugene E. Voiland
Eugene E. Voiland

Subscribed and sworn to before me this thirty-first day of July, 1980
in San Jose, County of Santa Clara, California

Merridy Wallace



My Commission expires April ²⁰ 1981. *mw*

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 "RESPONSE OF GENERAL ELECTRIC COMPANY TO INTERVENOR'S INTERROGATORIES, FIRST SET, TO APPLICANT" 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 August 4, 1980:

Andrew C. Goodhope, Esq., Chairman
Atomic Safety and Licensing Board
3320 Estelle Terrace
Wheaton, Maryland 20906

Dr. Linda W. Little
Atomic Safety and Licensing Board
5000 Hermitage Drive
Raleigh, North Carolina 27612

Dr. Forrest J. Remick
Atomic Safety and Licensing Board
305 East Hamilton Avenue
State College, Pennsylvania 16801

Atomic Safety and Licensing Appeal
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Bridget L. Rorem
Essex, Illinois 60935

Everett J. Quigley
R.R. 1, Box 378
Kankakee, Illinois 60901

Susan N. Sekuler, Esq.
George William Wolff, Esq.
Office of the Attorney General
188 West Randolph Street
Suite 2315
Chicago, Illinois 60606

Marjorie Ulman Rothschild, Esq.
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555


Matthew A. Rooney

Dated: August 4, 1980

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. SNM-1265)
Issued to G.E. Morris Operation)
Fuel Storage Installation)

RESPONSE OF GENERAL ELECTRIC COMPANY
TO "REQUEST FOR ADMISSION OF GENUINENESS OF DOCUMENTS"
PROPOUNDED BY INTERVENOR, STATE OF ILLINOIS

Applicant General Electric Company ("General Electric") responds to the "Request for Admission of Genuineness of Documents" propounded by Intervenor, PEOPLE OF THE STATE OF ILLINOIS, by WILLIAM J. SCOTT, ATTORNEY GENERAL OF THE STATE OF ILLINOIS, on or about July 14, 1980, as follows:

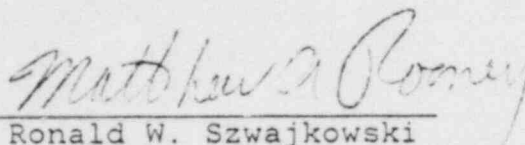
1. General Electric admits that it has produced a document entitled "Alternatives for DOE Storage of Spent Fuel at Morris Operation," that the document bears the number NEDG-24641, that it is dated April 1979, and that a copy of this document is already in the possession of the General Electric Company. General Electric states that neither a genuine copy nor any other copy of the document was enclosed with Intervenor's "Request for Admission of Genuineness of Documents," so that General Electric reserves

the right to dispute and object to the genuineness and completeness of any particular copy which any party may seek to use in this proceeding, if in fact that copy is not genuine or is not complete or has been altered in any way. The admissions made herein are without waiver of or prejudice to any other objections which General Electric may otherwise make to the relevancy, competency, or admissibility of any copy of the document.

2. General Electric admits that it has produced a document entitled "Spent Fuel Receipt and Storage at the Morris Operation," that the document bears the number NEDG-21889, that it was dated June 1978, and that a copy of this document is already in the possession of the General Electric Company. General Electric states that neither a genuine copy nor any other copy of the document was enclosed with Intervenor's "Request for Admission of Genuineness of Documents," so that General Electric must reserve the right to dispute and object to the genuineness and completeness of any particular copy which any party may seek to use in this proceeding, if in fact that copy is not genuine or is not complete or has been altered in any way. The admissions made herein are without waiver of or prejudice to any other objections which General Electric may otherwise make to the

relevance, competency, or admissibility of any copy of the document.

Respectfully submitted,
GENERAL ELECTRIC COMPANY



Ronald W. Szwajkowski
Matthew A. Rooney

Its Attorneys

OF COUNSEL:

MAYER, BROWN & PLATT
231 South LaSalle Street
Chicago, Illinois 60604
(312) 782-0600

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 RESPONSE OF GENERAL ELECTRIC COMPANY TO "REQUEST FOR ADMISSION OF GENUINENESS OF DOCUMENTS" PROPOUNDED BY 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 August 4, 1980:

Andrew C. Goodhope, Esq., Chairman
Atomic Safety and Licensing Board
3320 Estelle Terrace
Wheaton, Maryland 20906

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5000 Hermitage Drive
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Dr. Forrest J. Remick
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Panel
U.S. Nuclear Regulatory Commission
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Essex, Illinois 60935

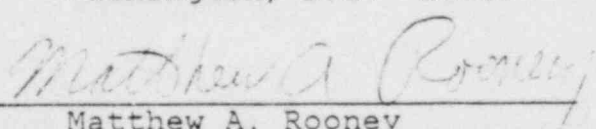
Everett J. Quigley
R.R. 1, Box 378
Kankakee, Illinois 60901

Susan N. Sekuler, Esq.
George William Wolff, Esq.
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188 West Randolph Street
Suite 2315
Chicago, Illinois 60601

Marjorie Ulman Rothschild, Esq.
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555


Matthew A. Rooney

Dated: August 4, 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))

RESPONSE OF GENERAL ELECTRIC COMPANY
TO INTERVENOR'S INTERROGATORIES,
FIRST SET, DIRECTED TO APPLICANT

Applicant General Electric Company ("General Electric") responds as follows to the "Intervenor's Interrogatories, First Set, Directed to Applicant," served on or about July 14, 1980 by intervenor, PEOPLE OF THE STATE OF ILLINOIS, by WILLIAM J. SCOTT, Attorney General for the State of Illinois ("Intervenor").

OBJECTIONS TO INTERVENOR'S
PURPORTED INSTRUCTIONS

"For each person so identified:

"A. Give such person's name, home address and telephone number, and business address and telephone number.

"B. Give such person's academic professional [sic] credentials including degrees received, fellowships, professional societies and professional honors.

"C. Give such person's present title, job responsibilities and duties, number of years in such position, and name of such person's supervisor.

"D. List such person's previous work experience including:

- (i) Name of position and employer;
- (ii) Number of years in such position;
- (iii) Duties and responsibilities in one's such position;
- (iv) Name of such person's supervisor while in that position.

"E. State whether or not such person has given or prepared any oral or written statements regarding each area or areas for which such person has been identified.

"F. For each such statement identified in E:

- (i) Identify such statement;
- (ii) State whether such statement was written or oral;
- (iii) State when, by whom and to whom such statement was made or submitted;
- (iv) If this statement was written, attach a true and accurate copy of it to the answer herein."

Response: General Electric objects to ¶ A to the extent it seeks persons' home addresses and telephone numbers on the grounds that such information is personal to the individuals involved and is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery allowed in these proceedings pursuant to the rules and regulations of the Nuclear Regulatory Commission, 10 C.F.R. § 2.740(b).

General Electric objects to ¶¶ B, C, D, E and F to the extent that, in conjunction with the interrogatories into which they are incorporated, they seek unnecessary and burdensome detail, information that is not "available to the party" within the meaning of 10 C.F.R. §2.740 b (a), and information that is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

General Electric further objects to paragraphs E and F on the further ground that the term "statement" is vague, ambiguous and undefined. To the extent that the Intervenor through such terms and these paragraphs seeks discovery of communications and/or documents protected by the attorney-client privilege, the work-product doctrine and/or 10 C.F.R. §2.740(b)(2), General Electric objects on those grounds also. General Electric further objects that ¶ F(iv) is not an instruction for answering an interrogatory, but is in fact an improper document request, and General Electric objects that it seeks to impose upon General Electric duties in excess of those permitted by either 10 C.F.R. §2.740 b (governing interrogatories) or 10 C.F.R. §2.741 (governing requests for production of documents).

Resumes of David M. Dawson and Eugene E. Voiland are attached as General Electric's response to the Intervenor's Instructions.

In responding to the Interrogatories propounded with the above instructions, General Electric does not waive any of the foregoing objections to such instructions. Indeed, General Electric hereby expressly incorporates into each of its responses to the interrogatories the objections applicable to each instruction applicable to such interrogatory.

RESPONSES TO INTERROGATORIES

"INTERROGATORY NO. 1: Identify the person or persons who are employed or are representatives of the General Electric Company who have knowledge about the following:"

Response: General Electric objects to the quoted preamble to Interrogatory No. 1, and to each of the sub-parts to which it applies, on the grounds that the term "knowledge" is vague, ambiguous and undefined, and on the ground that the phrase "are employed or are representatives" is overly broad in light of the fact General Electric has hundreds of thousands of employees. General Electric objects that these terms in combination with each other and the subparts that follow make the interrogatory incapable of being practicably answered as propounded, and General Electric states that it is therefore limiting its response to responsible management personnel in the respective areas.

"A. Any interactions between the Department of Energy or the Nuclear Regulatory Commission and General Electric regarding the use of the Morris operation as a federal repository for spent fuel or any other future use."

Response: General Electric objects that Subpart A of Interrogatory No. 1 violates the Board's "Order Ruling On

Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is not relevant to the subject matter involved in the proceeding pursuant to the Board's Order, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"B. Any plans, programs, proposals for Federal Government use of the Morris facility as a federal repository for spent fuel."

Response: General Electric objects that Subpart B of Interrogatory No. 1 violates the Board's "Order Ruling on Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is not relevant to the subject matter involved in the proceeding pursuant to the Board's Order, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"C. Security Plans"

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart C as follows:

E.E. Voiland.

"D. License Amendments"

Response: General Electric objects to Subpart D on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or to this subpart, General Electric answers Interrogatory No. 1 Subpart D, as properly limited, as follows:

For SNM License 1265,
D.M. Dawson.

"E. Emergency Plans"

Response: Without waiving any of the objections stated in response to the purported instructions, and without

waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart E as follows:

E.E. Voiland.

"F. Liaison with general population and emergency facilities and state agencies dealing with emergency and evacuation plans."

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart F, as properly limited, as follows:

E.E. Voiland, with the exception of liaison with the general population. General Electric has no liaison with the general population regarding emergency and evacuation plans or emergency facilities in the area of the Morris Operation.

"G. Radiation monitoring or testing."

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart G as follows:

E.E. Voiland.

"H. Any environmental appraisals or analyses prepared with regard to the use of the Morris facility as a spent fuel storage facility from 1979 forward."

Response: General Electric objects to Subpart H on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or this subpart, General Electric answers Interrogatory No. 1 Subpart H, as properly limited, as follows:

D.M. Dawson, for the Environmental Impact Appraisal Related to The Renewal of Material License SNM-1265 for the Receipt, Storage and Transfer of Spent Fuel at Morris Operation, General Electric Co., Docket No. 70-1308, published: U.S. Nuclear Regulatory Commission, Division of Fuel Cycle and Material Safety, Washington, D.C. June 1980.

"I. Any Interactions with Nuclear Regulatory Commission in regard to the license renewal application."

Response: General Electric objects to Subpart I on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or this subpart, General Electric answers Interrogatory No. 1 Subpart 1 as follows:

D.M. Dawson.

"J. Any interactions with NRC personnel in regard to current operation of Morris."

Response: General Electric objects to Subpart J on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore

beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving the objections stated in response to the purported instructions, or the objections applicable to all subparts of Interrogatory No. 1, or to this subpart, General Electric answers Interrogatory No. 1 Subpart J as follows:

D.M. Dawson and E.E. Voiland.

"K. Any interactions with NRC in regard to the License Amendment requested [sic] January 18, 1980."

Response: See Response to Interrogatory 5.

"L. Amount of fuel projected to be stored during license period."

Response: Without waiving any of the objections stated in response to the purported instructions, or any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart L as follows:

D.M. Dawson.

"INTERROGATORY NO. 2: Identify any officials or representatives of the Nuclear Regulatory Commission with whom GE has had contact in regard to the license renewal proceeding."

Response: General Electric objects that Interrogatory No. 2 is vague, ambiguous and overly broad. Without waiving those objections or the objections stated in response to the purported instructions, and limiting its response to responsible General Electric management personnel, General Electric answers Interrogatory No. 2 as follows:

To the best of General Electric's knowledge, the U.S. Nuclear Regulatory Commission personnel with whom General Electric had contact in regard to the renewal of Materials License SNM-1265, Docket No. 70-1308 were as follows:

A.T. Clark
R.E. Cunningham
F.M. Empson
C.C. Peck
J.P. Roberts
M.U. Rothschild
L.C. Rouse
B.S. Spitalny
R.W. Starostecki
S.A. Treby

"INTERROGATORY NO. 3: Identify any plans or proposals for change in use of the Morris facility which would necessitate a license amendment to the existing license."

Response: General Electric objects that the interrogatory is vague and ambiguous and further objects that the entire interrogatory violates the Board's "Order Ruling on Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is irrelevant to the subject matter involved in the proceeding pursuant to the Board's Order because the subject matter of this interrogatory is beyond the scope of the licensing proceeding, is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"INTERROGATORY NO. 4: Identify all experts to be used as consultants and for witnesses, areas of expertise and contentions to be addressed."

Response: Without waiving any of the objections stated in response to the purported instructions, General Electric responds that as of the date of these responses to these interrogatories, it has not selected or retained any experts to be used as consultants or witnesses regarding this licensing proceeding. General Electric will amend and supplement this response when and in the event that it selects or retains any such expert.

"INTERROGATORY NO. 5: Describe the License Amendment requested on January 18, 1980 and the reasons therefore."

Response: No license amendment was requested on January 18, 1980. In the letter of June 12, 1980 to Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission from D.M. Dawson, Manager, Licensing and Transportation, General Electric Company, reference to a January 18, 1980 amendment request was made in error. The date in paragraphs one and two of that June 12, 1980 letter should have been January 23, 1980. Notification of the error was transmitted to the NRC and distributed to the service list for this proceeding on July 29, 1980. On January 31, 1980, the amendment request of January 23, 1980 was distributed to the service list for this proceeding. That distribution contained a description of the requested amendment and the reasons therefor.

"INTERROGATORY NO. 6: In regard to Revision C2 of NEDO-21326 Describe [sic] in detail."

Response: As a general response to this entire interrogatory, General Electric states as follows:

The purpose of the proposed amendment of June 12, 1980, "Revised Amendment Request Regarding Changes, Tests and Experiments", is to provide General Electric the same flexibility to make changes in plant and procedures and conduct tests and experiments as is provided in other existing and proposed regulations. As of August 1, 1980, the amendment had not been issued by the NRC.

In addition to provisions to make changes and to perform tests and experiments, the proposed amendment request incorporates the existing provision of 10 CFR 70.32(e) regarding changes which may affect the physical security plan. This provision was incorporated into the request for purposes of fully delineating the processing of all changes. The proposed amendment is intended to make clear the review criteria that must be followed in making contemplated changes and in performing tests.

The changes, tests and experiments which are currently planned are listed below in the response to Interrogatory 6A. The types of changes contemplated in the plant or procedures as they are presently described in the Consolidated Safety Analysis Report, NEDO-21326C (hereinafter "CSAR") would be those which are related to improvements and refinements in the facility and procedures and therefore are related to fuel storage in the existing facility. Tests and experiments will be tests and experiments conducted to gain knowledge of parameters of and those affecting fuel in storage. As explained

in the proposed amendment, activities which are significantly different from present activities, or could produce an effect significantly different from present activities, will be reviewed by the NRC under a General Electric request for approval.

The situation under the proposed amendment if issued will be no different than the situation presently existing at Morris. General Electric is currently permitted to make changes and perform tests that do not require revision of the Operation Specifications (CSAR, Ch. 10) and do not represent an unreviewed safety or environmental issue. The request only seeks to clarify the process to be followed.

"A. All changes, tests and experiments proposed or projected."

Response: General Electric answers Interrogatory No. 6

Subpart A as follows:

Changes, tests and experiments proposed or projected are the following:

Changes

Redesigned unloading pit doorway guard at the unloading basin entrance to the fuel storage basin.

Tests and experiments

1. Measurements of gamma radiation adjacent to individual fuel bundles.
2. Measurements of thermal output of individual fuel bundles and transfer rate of radioactive material from fuel bundles to the basin water.

"B. Which changes in plant, procedures, tests, and experiments related to receipt, storage and transfer of spent fuel are proposed to be performed without prior approval of NRC."

Response: General Electric answers Interrogatory No. 6

Subpart B as follows:

No decision has been made as to whether any of the proposed or projected changes, tests or experiments described in the response to INTERROGATORY No. 6A are such that they may be performed, under the criteria defined in the proposed amendment without prior approval of the NRC.

"C. Any other types of changes in plant operation, procedures, tests or experiments are [sic] proposed or projected to be performed without prior NRC approval."

Response: General Electric answers Interrogatory No. 6

Subpart C as follows:

None

"D. Who will make the determination that changes in plant operation, procedures, tests and experiments will not require a change in the Operation Specifications, Chapter 10 of NEDO-2132 6C, does [sic] not involve unreviewed safety or environmental issues and does [sic] not decrease the effectiveness of the physical security plan; what standards will be applied to make this determination; when will that determination be made."

Response: General Electric answers Interrogatory No. 6

Subpart D as follows:

The determination that changes in plant operations and procedures and tests and experiments will not require a change in the Operation Specifications (CSAR, Ch. 10) and will not involve unreviewed safety or environmental issues will be made by the Morris Operation Plant Safety Committee, with concurrence required by the Manager - Morris Operation and the Manager - Licensing and Transportation. The determination that changes in the physical security plan do not decrease the effectiveness of the plan will be made by

the Manager - Morris Operation with concurrence required by Manager - Licensing and Transportation. The standards applied in making the determination are stated in the proposed amendment. The determination will be made prior to implementation of the change, test or experiment.

"E. What type of NRC review of these changes listed above is anticipated."

Response: General Electric answers Interrogatory No. 6

Subpart E as follows:

It is not known by General Electric what type of NRC review will be made of changes which General Electric has determined do not require prior NRC approval.

"F. What type of reports of the changes shall be made to the NRC, to State agencies, to shareholders and to the public; when will these reports be issued."

Response: General Electric answers Interrogatory No. 6

Subpart F as follows:

Annual reports of the changes which General Electric has determined do not require prior NRC approval will be made and issued according to the proposed amendment. State agencies, shareholders and the public may review the annual reports in either the NRC public document room in Washington, D.C. or in the local public document room in the City of Morris public library.

"G. Will the NRC or any other agency be notified of the inception of any changes, as listed above."

Response: General Electric objects to Subpart G of Interrogatory No. 6 on the grounds that it is vague, ambiguous and redundant. Without waiving any of the objections stated in response

to the purported instructions and without waiving any of the objections applicable to this subpart of Interrogatory No. 6, General Electric answers Interrogatory No. 6 Subpart G as follows:

Regarding those changes, tests or experiments that may be undertaken without an amendment to the license, General Electric will not be required, under the conditions of the proposed amendment, to notify the NRC or any other agency prior to the commencement of the changes, tests or experiments.

"H. Identify NRC regulation [sic] that permits changes in plant operation or procedure without prior NRC approval."

Response: General Electric answers Interrogatory No. 6 Subpart H as follows:

The NRC regulation that permits changes to the physical security plan without prior approval is §70.32(e) Conditions of licenses, Part 70, Domestic Licensing of Special Nuclear Material, Title 10, Code of Federal Regulations.

"INTERROGATORY NO. 7: Identify plans for future storage of spent fuel until the year 2000 including:

- A. Estimated shipment date(s),
- B. Number of assemblies,
- C. Point of origin; owner
- D. Mode of transportation
- E. Number of years of storage estimated."

Response: General Electric answers Interrogatory No. 7

as follows:

Current plans for future storage of spent fuel not yet received at the Morris facility are as follows:

- A. The estimated shipment dates are August 1, 1980 and thereafter at an estimated rate of two assemblies per week until all assemblies are shipped.
- B. The number of assemblies is ninety-one (91).
- C. The point of origin is San Onofre Nuclear Station, Unit 1, San Diego County, California. To the best of General Electric's knowledge and belief, the owners are Southern California Edison Company and San Diego Gas and Electric Company.
- D. The mode of transportation is truck cask.
- E. The period of storage estimated is through December 1986.

"INTERROGATORY NO. 8: In regard to Spent Fuel Storage Problems at Morris:

Response: General Electric objects to the improper assumption and characterization that there have been "problems" regarding the storage of spent fuel at Morris.

"A. Have any fuel rods ruptured, exploded, or otherwise leaked radiation while in storage? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart A as follows:

No fuel rods have ruptured or exploded. There is a slow transfer of certain radioactive materials from some of the fuel to the basin water. This condition is described in "Operating Experience Irradiated Fuel Storage, Morris Operation", NEDO-20969B, §3.3.1 (May 1978) and the CSAR, §5.52.

"B. Have you experienced problems with warped or damaged fuel assemblies in storage? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart B as follows:

There has been no evidence of warping or damage of fuel bundles in storage and therefore no problems have been experienced.

"C. Have you experienced problems with damaged racks? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart C as follows:

There has been no damage to the present storage system and therefore no problems have been experienced. Three positions in the temporary racks in use between 1974 and 1975 were slightly damaged prior to installation. These three positions were never

used. The temporary racks were replaced by the present storage system in 1976.

"D. Has the liner of the spent fuel pool ever leaked? If yes, please state total amount of coolant lost, ultimate destination of coolant that leaked, and cause of leak."

Response: General Electric answers Interrogatory No. 8

Subpart D as follows:

There is no evidence of leakage through the stainless steel liner except for leakage that occurred when the liner was penetrated as a result of the cask-tip incident, which is described in the CSAR, §8.3, and the leakage that has occurred intermittently at the seal in the expansion gate, which is described in Operating Experience, Irradiated Fuel Storage - Morris Operation, NEDO-20969B2, §2.3.2.

"E. Has the pool radioactive waste system ever failed? If yes, please explain."

Response: General Electric objects to Subpart E of this interrogatory on the grounds that it is vague and ambiguous. Without waiving these objections, General Electric answers Interrogatory 8 Subpart E as follows:

The low activity waste vault (that stores radioactive materials collected by the pool cleanup system and the cask flush system) has never failed. The pool cleanup system (that removes radioactive materials from the pool water) has never failed to perform its function of maintaining water quality within the limits of the CSAR, Ch. 10.

"F. Has the pool coolant circulation system ever failed? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart F as follows:

There have been no failures of the function of the cooling system. The cooling system was damaged by freezing in an incident that occurred January, 1977. This incident is described in "Operating Experience, Irradiated Fuel Storage-Morris Operation," Morris, Illinois NEDO-20969B2, §3.2.2

"G. Have you had problems with "crud" buildup on the assemblies or in the pool? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart G as follows:

No

"H. Has the spent fuel pool ever been drained? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart H as follows:

No

"I. Has the radiation level [sic] of the spent fuel pool ever exceeded allowable limit? If yes, please explain."

Response: General Electric objects to Subpart I of this interrogatory on the grounds that it incorrectly assumes that there is an allowable limit for the radiation level of the spent fuel pool. Without waiving this objection, General Electric answers Interrogatory No. 8 Subpart I as follows:

The concentration of radioactivity in the spent fuel pool has

never exceeded the limit specified in the CSAR, Ch. 10.

"J. Have fuel assemblies ever been dropped during handling? If so, please list dates, number of assemblies dropped, and extent of damage, if any."

Response: General Electric answers Interrogatory No. 8

Subpart J as follows:

Fuel bundles have never been dropped outside their storage basket. However, on two occasions, October 11, 1972 and November 11, 1972, while placing a fuel bundle in a storage basket the fuel bundle became disengaged from the grapple allowing it to drop an estimated one foot onto the bottom of the storage basket. Examinations of the fuel bundle and baskets revealed that no damage was sustained. The fuel handling tools were redesigned in 1973 and no further fuel bundle drops have been experienced.

"K. Please describe any problems encountered in storing spent fuel not described in response to the above questions."

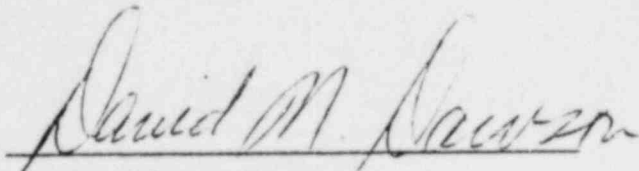
Response: General Electric objects that Interrogatory No. 8

Subpart K is vague and ambiguous and improper to the extent that it exceeds the scope of this proceeding and the limits upon discovery set forth in 10 C.F.R. §2.740. Without waiving any of the foregoing objections, General Electric answers Interrogatory No. 8

Subpart K as follows:

None

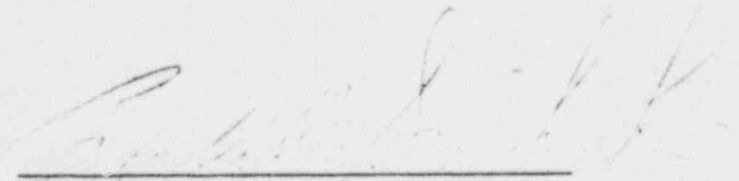
Respectfully submitted,
GENERAL ELECTRIC COMPANY



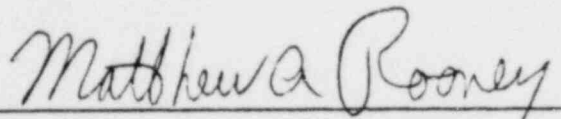
David M. Dawson



Eugene E. Voiland



Ronald W. Szwajkowski
One of Its Attorneys



Matthew A. Rooney
One of Its Attorneys

Of counsel:

MAYER, BROWN & PLATT
231 S. LaSalle St.
Chicago, Il 60614
(312)782-0600

David M. Dawson
General Electric Co.
175 Curtner Avenue
San Jose, CA 95125
408*925-6330

Academic:

Bachelor of Science, Physics, 1958, Washington and Lee University,
Lexington, VA

Graduate study, Physics, 1959, Vanderbilt University, Nashville, TN

Fellowship:

Atomic Energy Commission Fellowship, Radiological Physics 1958-1959,
Vanderbilt University and Oak Ridge National Laboratory.

Professional Memberships:

Member, Northern California Chapter of Health Physics Society

Member, American Nuclear Society Standards Subcommittee 8, "Fissionable
Materials Outside Reactors" 1966 to present.

Alternate American Nuclear Society Representative to American National
Standards Institute Committee N14, "Packaging and Transportation of
Fissile and Radioactive Materials" 1969 to present.

Registered Professional Nuclear Engineer, California, NU 2040, 1977

Employment:

May 1975 to Present

General Electric Company
Nuclear Energy Business Group
Spent Fuel Service Operation
Supervisor, J.E. Van Hoomissen, Manager, SFSO
Title: Manager, Licensing and Transportation

Responsible for NRC licensing of fuel storage facilities
irradiated fuel shipping casks and high density fuel storage
systems. Also responsible for overall transportation system
for irradiated fuel, including design of equipment and trans-
portation planning. Responsibilities include review of
designs of facilities and equipment to assure compliance with
regulatory requirements, preparation of license submittals,
promulgation of license conditions and require-
ments to operating and design components and review of compliance
with these conditions and requirements.

May 1974 to May 1975

General Electric Company
Nuclear Energy Division
Boiling Water Reactor Projects Department
Safety and Licensing Operation
Supervisor, L.S. Gifford, Manager Regulatory Operations
Title: Senior Engineer, Licensing

Responsible for liaison between headquarters project and operating reactor licensing personnel and AEC/NRC regulatory staff.

May 1970 to May 1974

General Electric Company
Nuclear Energy Division
Nuclear Fuel Manufacturing
Supervisor, H.H. Klepfer and others
Title: Manager, Nuclear Safety and Licensing

Responsible for establishing and maintaining radiological safety and criticality safety programs. Responsibilities included technical evaluation of designs of equipment and facilities to assure compliance with regulatory requirements, preparation of license submittals, promulgation of license conditions and regulatory requirements to operating and design components, review of compliance with these conditions and requirements, and development and implementation of nuclear safety programs.

September 1965 to May 1970

General Electric Company
Nuclear Energy Division
Nuclear Fuels Engineering
Supervisors, T. Trocki and others
Title: Criticality Safety Engineer

Responsibility for evaluation of the criticality safety of fuel manufacturing operations fuel development activities, fuel storage, and fuel transportation packages.

May 1962 to September 1965 (and June 1959 to November 1961)

Pratt and Whitney Aircraft Company
Connecticut Advanced Nuclear Engineering Laboratory (and
Connecticut Aircraft Nuclear Engine Laboratory)
Health and Safety Engineering Department
Supervisor: W.F. Patton and others
Title: Nuclear Safety Engineer (and Industrial Hygienist)

Responsible for evaluation, approval and review
for compliance with requirements of facilities and
equipment for fuel fabrication, fuel storage and fuel
development. Responsibilities included review of
fissile material and waste shipments for compliance
with requirements. (Responsible for providing services
for health physics, industrial hygiene and safety
engineering for areas handling radioactive materials).

November 1961 to May 1962

University of California
Lawrence Berkeley Radiation Laboratory
Health Chemistry Department
Supervisor: P.W. Howe
Title: Technical Coordinator

Completed training course in radiation safety and
transuranic element handling procedures.

Courses

Criticality and Criticality Safeguards	1960	University of California
Fast Reactor Technology	1967	General Electric
Nuclear Engineering Fundamental, Part II,	1968	General Electric
Nuclear Power Safety	1975	Georgia Institute of Technology

Papers

- "Criticality Safety in Fuel Handling at Reactor Sites", GE I&SE Seminar, 1972.
- "Health Physics Problems of Fuel Fabrication", North Carolina HPS, Meeting, 1972.
- "Incineration of Low Uranium Content Wastes", ANS Meeting, 1973, (with G. Sakash).
- "Moderation Control for Purposes of Criticality Safety", ANS Meeting, 1976.

Eugene E. Voiland
Morris Operation
General Electric Company
7555 E. Collins Road
Morris, IL 60450
815*942-5590

Academic:

Bachelor of Science, 1947, Seattle College, Seattle, WA
Graduate Study, Physical Chemistry, 1947-1951, University of
Notre Dame Notre Dame, IN

Fellowship:

Atomic Energy Commission Pre Doctoral Fellowship in the Physical
Sciences, 1948-1950, University of Notre Dame.

Professional Memberships:

Member, American Nuclear Society
Member and Director, Chicago Section, American Nuclear Society
Member, American Association for the Advancement of Science

Other Memberships:

Public Member, Illinois Energy Resources Commission, Springfield, IL
Vice Chairman, Board of Directors, Three Rivers Manufacturers
Association, Joliet, IL.

Employment:

March 1975 to Present

General Electric Company
Nuclear Energy Business Group
Spent Fuel Services Operation (SFSO)
Supervisor, J.E. Van Hoomissen, Manager, SFSO
Title: Manager, Morris Operation

Responsible for overall management of Morris
Operation, General Electric's spent fuel receiving
and storage facility at Morris, Illinois and spent
fuel shipping containers (casks). Activities for
which he has management responsibility include:

operation of the spent fuel storage pools;
operation of general plant systems;
engineering design, fabrication, and installation services;
supporting services such as quality assurance and quality control, radiological and industrial safety, emergency responses, analytical laboratory, physical security and safeguards systems, and purchasing;
and field service activities related to use of the IF-300 cask at reactors.

Note: Additional responsibilities include maintenance of a formal management system of instructions, manuals, and procedures; administration of NRC Licenses and Certificates of Compliance; and assuring compliance with all applicable regulatory requirements.

December 1973 to March 1975

General Electric Company
Nuclear Energy Division
Midwest Fuel Recovery Plant
Supervisor, B.F. Judson, Manager Midwest Fuel Recovery Plant
Title: Manager, Safety and Quality Assurance

Responsible for site (AEC and State) licensing and compliance activities, radiological and industrial safety, quality assurance and nuclear materials management.

December 1971 to December 1973

Argonne National Laboratory
Chemical Engineering Division
Argonne, IL
Supervisors, R.C. Vogel, L. Burris
Title: Manager, Analytical Laboratory

Management of a diversified analytical laboratory, including, plutonium, mass spectrometric, x-ray, gas chromatographic and general chemical laboratories.

July 1968 to November 1971

Battelle Memorial Institute
Pacific Northwest Laboratories
Richland, WA
Supervisors, J.J. Cadwell, W.D. Richmond, W.D. Widrig
Title: Senior Research Associate

Technically responsible for Laboratory radioactive waste management activities. Representative for Battelle on the AEC Richland Operations/Contractor Waste Management Advisory Board. Special studies of various kinds.

October 1964 to July 1968

General Electric Company (through December 1964)
Battelle Northwest (from January, 1965)
Supervisors, W.H. Reas, M.T. Walling, D.R. deHalas
Title: Manager, Chemical Research Subsection

Managed diversified R&D organization comprising four units. Work primarily associated with nuclear field including work in (1) separations chemistry; solvent extraction, ion exchange, fission product recovery, nuclear waste processing and molten salt processes, (2) basic physical and inorganic chemistry of actinide elements, (3) remote analytical instrumentation and radio-chemical analytical research, (4) hot cell complex used for recovery of ¹⁴⁷Pm, ²³⁷Np, ²³⁸Pu separation and purification and process demonstration and (5) personally served as BNW Program Director for site AEC Division of Isotope Development Programs. (105 scientists, engineers and technicians).

November 1961 to October 1964

General Electric Company
Hanford Atomic Products Operation
Reactor and Fuels Section
Supervisor, F.W. Albaugh
Title: Manager, Materials Research and Services Subsection

Managed 3-component organization performing (1) R&D in radiation effects and chemical reactions of nuclear graphite, (2) metallographic services and (3) metallurgical and physical testing of irradiated fuels and materials. (85 scientists, engineers and technicians).

July 1955 to November 1961

General Electric Company
Hanford Atomic Products Operation
Chemical Research and Development Section
Supervisor, W.H. Reas
Title: Supervisor, Heavy Element Chemistry Unit

July 1955 to November 1961 - cont'd.

Directed research to actinide element chemistry, separations, processes, ion exchange, solvent extraction and molten salt chemistry. (10-15 scientists and technicians).

October 1951 to July 1955

General Electric Company
Hanford Atomic Products Operation
Chemical Research and Development Section
Supervisors, O.F. Hill, W.H. Reas
Title: Research Scientist

Conducted research in nuclear fuel reprocessing, separations chemistry, solvent extraction and and isotope separation.

Papers

"Management of High Level Radioactive Wastes", Eighth Annual National Conference on Radiation Control, Springfield, Illinois, May 2-7, 1976.
"Control of Nuclear Fuel Storage Basin Water Quality by Use of Powdered Ion Exchange Resins and Zeolites", ASME Paper 77-JPGC-NE-15, ASME/IEEE Joint Power Generation Conference, Long Beach, California, September 18-21, 1977 (with L.L. Denio, D.E. Knowlton).
"Experience in Operation of the Morris Operation Storage Facility", American Nuclear Society Executive Conference on Spent Fuel Policy and Its Implications, Buford, Georgia, April 2-5, 1978.
Testimony before Illinois Legislature: "Experience in Operation of an Independent Fuel Storage Facility", June 7, 1979. "About Away-From-Reactor Spent Fuel Storage", August 29, 1979.
Testimony before California Energy Resources and Development Commission: "Experience in Operation of an Independent Fuel Storage Facility", March 10, 1977.
Various classified reports related to separations chemistry.

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

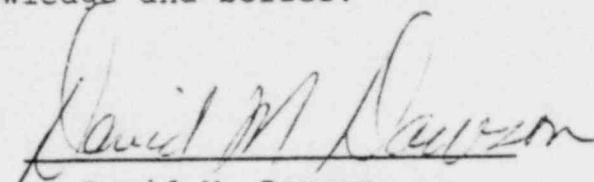
In the Matter of)	Docket No. 70-1308
)	
GENERAL ELECTRIC COMPANY)	(Renewal of SNM-1265)
)	
(GE Morris Operation Spent)	
Fuel Storage Facility))	

VERIFICATION OF DAVID. M. DAWSON

David M. Dawson, being duly sworn, deposes and says as follows:

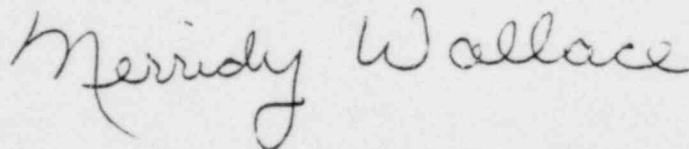
1. That he is employed as Manager, Licensing and Transportation, General Electric Company, Spent Fuel Services Operation, San Jose, California, and that he is duly authorized to answer the interrogatories numbered 1C, 1D, 1E, 1F, 1G, 1H, 1I, 1J, and 1L; 2; 5; 6, 6B, 6C, 6D, 6E, 6F, 6G, 6H and 7 propounded by the State of Illinois under date of service of July 11, 1980.

2. That the above-mentioned and attached answers are true and correct to the best of his knowledge and belief.



David M. Dawson

Subscribed and sworn to before me this thirty-first day of July, 1980
in San Jose, County of Santa Clara, California.



My Commission expires April ³⁰ ~~21~~ ^{mw}, 1981.



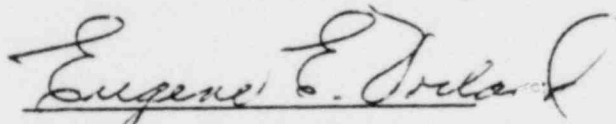
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of) Docket No. 70-1308
)
GENERAL ELECTRIC COMPANY) (Renewal of SNM-1265)
)
(GE Morris Operation Spent)
Fuel Storage Facility))

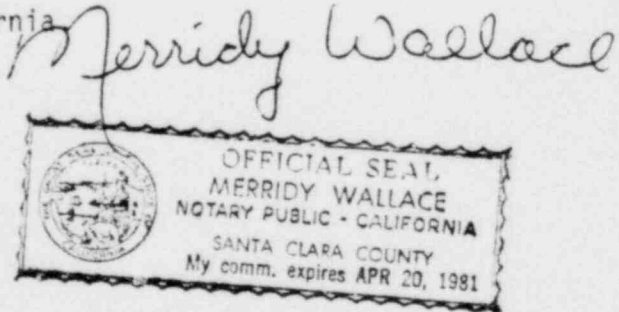
VERIFICATION OF EUGENE E. VOILAND

Eugene E. Voiland, being duly sworn, deposes and says as follows:

1. That he is employed as Manager, Morris Operation, General Electric Company, Morris, Illinois and that he is duly authorized to answer the interrogatories numbered 6A, 8 propounded by the State of Illinois under date of service of July 11, 1980.
2. That the above-mentioned and attached answers are true and correct to the best of his knowledge and belief.


Eugene E. Voiland

Subscribed and sworn to before me this thirty-first day of July, 1980
in San Jose, County of Santa Clara, California



My Commission expires April ²⁰~~21~~ ^{mw} 1981.

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 "RESPONSE OF GENERAL ELECTRIC COMPANY TO INTERVENOR'S INTERROGATORIES, FIRST SET, TO APPLICANT" 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 August 4, 1980:

Andrew C. Goodhope, Esq., Chairman
 Atomic Safety and Licensing Board
 3320 Estelle Terrace
 Wheaton, Maryland 20906

Dr. Linda W. Little
 Atomic Safety and Licensing Board
 5000 Hermitage Drive
 Raleigh, North Carolina 27612

Dr. Forrest J. Remick
 Atomic Safety and Licensing Board
 305 East Hamilton Avenue
 State College, Pennsylvania 16801

Atomic Safety and Licensing Appeal
 Panel
 U.S. Nuclear Regulatory Commission
 Washington, D.C. 20555

Bridget L. Rorem
 Essex, Illinois 60935

Everett J. Quigley
 R.R. 1, Box 378
 Kankakee, Illinois 60901

Susan N. Sekuler, Esq.
 George William Wolff, Esq.
 Office of the Attorney General
 188 West Randolph Street
 Suite 2315
 Chicago, Illinois 60606

Marjorie Ulman Rothschild, Esq.
 United States Nuclear
 Regulatory Commission
 Washington, D.C. 20555

Atomic Safety and Licensing
 Board Panel
 U.S. Nuclear Regulatory
 Commission
 Washington, D.C. 20555

Docketing and Service Section
 Office of the Secretary
 U.S. Nuclear Regulatory
 Commission
 Washington, D.C. 20555

Matthew A. Rooney

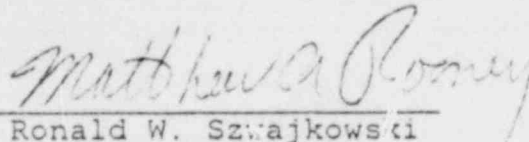
 Matthew A. Rooney

the right to dispute and object to the genuineness and completeness of any particular copy which any party may seek to use in this proceeding, if in fact that copy is not genuine or is not complete or has been altered in any way. The admissions made herein are without waiver of or prejudice to any other objections which General Electric may otherwise make to the relevancy, competency, or admissibility of any copy of the document.

2. General Electric admits that it has produced a document entitled "Spent Fuel Receipt and Storage at the Morris Operation," that the document bears the number NEDG-21889, that it was dated June 1978, and that a copy of this document is already in the possession of the General Electric Company. General Electric states that neither a genuine copy nor any other copy of the document was enclosed with Intervenor's "Request for Admission of Genuineness of Documents," so that General Electric must reserve the right to dispute and object to the genuineness and completeness of any particular copy which any party may seek to use in this proceeding, if in fact that copy is not genuine or is not complete or has been altered in any way. The admissions made herein are without waiver of or prejudice to any other objections which General Electric may otherwise make to the

relevancy, competency, or admissibility of any copy of the document.

Respectfully submitted,
GENERAL ELECTRIC COMPANY



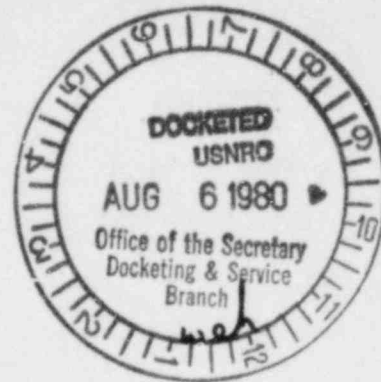
Ronald W. Sz wajkowski
Matthew A. Rooney

Its Attorneys

OF COUNSEL:

MAYER, BROWN & PLATT
231 South LaSalle Street
Chicago, Illinois 60604
(312) 782-0600

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 RESPONSE OF GENERAL ELECTRIC COMPANY TO "REQUEST FOR ADMISSION OF GENUINENESS OF DOCUMENTS" PROPOUNDED BY 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 August 4, 1980:

Andrew C. Goodhope, Esq., Chairman
Atomic Safety and Licensing Board
3320 Estelle Terrace
Wheaton, Maryland 20906

Dr. Linda W. Little
Atomic Safety and Licensing Board
5000 Hermitage Drive
Raleigh, North Carolina 27612

Dr. Forrest J. Remick
Atomic Safety and Licensing Board
305 East Hamilton Avenue
State College, Pennsylvania 16801

Atomic Safety and Licensing Appeal
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Bridget L. Rorem
Essex, Illinois 60935

Everett J. Quigley
R.R. 1, Box 378
Kankakee, Illinois 60901

Susan N. Sekuler, Esq.
George William Wolff, Esq.
Office of the Attorney General
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601

Marjorie Ulman Rothschild, Esq.
United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Matthew A. Rooney
Matthew A. Rooney

Dated: August 4, 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))

RESPONSE OF GENERAL ELECTRIC COMPANY
TO INTERVENOR'S INTERROGATORIES,
FIRST SET, DIRECTED TO APPLICANT

Applicant General Electric Company ("General Electric") responds as follows to the "Intervenor's Interrogatories, First Set, Directed to Applicant," served on or about July 14, 1980 by intervenor, PEOPLE OF THE STATE OF ILLINOIS, by WILLIAM J. SCOTT, Attorney General for the State of Illinois ("Intervenor").

OBJECTIONS TO INTERVENOR'S
PURPORTED INSTRUCTIONS

"For each person so identified:

"A. Give such person's name, home address and telephone number, and business address and telephone number.

"B. Give such person's academic professional [sic] credentials including degrees received, fellowships, professional societies and professional honors.

"C. Give such person's present title, job responsibilities and duties, number of years in such position, and name of such person's supervisor.

"D. List such person's previous work experience including:

- (i) Name of position and employer;
- (ii) Number of years in such position;
- (iii) Duties and responsibilities in one's such position;
- (iv) Name of such person's supervisor while in that position.

"E. State whether or not such person has given or prepared any oral or written statements regarding each area or areas for which such person has been identified.

"F. For each such statement identified in E:

- (i) Identify such statement;
- (ii) State whether such statement was written or oral;
- (iii) State when, by whom and to whom such statement was made or submitted;
- (iv) If this statement was written, attach a true and accurate copy of it to the answer herein."

Response: General Electric objects to ¶ A to the extent it seeks persons' home addresses and telephone numbers on the grounds that such information is personal to the individuals involved and is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery allowed in these proceedings pursuant to the rules and regulations of the Nuclear Regulatory Commission, 10 C.F.R. § 2.740(b).

General Electric objects to ¶¶ B, C, D, E and F to the extent that, in conjunction with the interrogatories into which they are incorporated, they seek unnecessary and burdensome detail, information that is not "available to the party" within the meaning of 10 C.F.R. §2.740 b (a), and information that is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence.

General Electric further objects to paragraphs E and F on the further ground that the term "statement" is vague, ambiguous and undefined. To the extent that the Intervenor through such terms and these paragraphs seeks discovery of communications and/or documents protected by the attorney-client privilege, the work-product doctrine and/or 10 C.F.R. §2.740(b)(2), General Electric objects on those grounds also. General Electric further objects that ¶ F(iv) is not an instruction for answering an interrogatory, but is in fact an improper document request, and General Electric objects that it seeks to impose upon General Electric duties in excess of those permitted by either 10 C.F.R. §2.740 b (governing interrogatories) or 10 C.F.R. §2.741 (governing requests for production of documents).

Resumes of David M. Dawson and Eugene E. Voiland are attached as General Electric's response to the Intervenor's Instructions.

In responding to the Interrogatories propounded with the above instructions, General Electric does not waive any of the foregoing objections to such instructions. Indeed, General Electric hereby expressly incorporates into each of its responses to the interrogatories the objections applicable to each instruction applicable to such interrogatory.

RESPONSES TO INTERROGATORIES

"INTERROGATORY NO. 1: Identify the person or persons who are employed or are representatives of the General Electric Company who have knowledge about the following:"

Response: General Electric objects to the quoted preamble to Interrogatory No. 1, and to each of the sub-parts to which it applies, on the grounds that the term "knowledge" is vague, ambiguous and undefined, and on the ground that the phrase "are employed or are representatives" is overly broad in light of the fact General Electric has hundreds of thousands of employees. General Electric objects that these terms in combination with each other and the subparts that follow make the interrogatory incapable of being practicably answered as propounded, and General Electric states that it is therefore limiting its response to responsible management personnel in the respective areas.

"A. Any interactions between the Department of Energy or the Nuclear Regulatory Commission and General Electric regarding the use of the Morris operation as a federal repository for spent fuel or any other future use."

Response: General Electric objects that Subpart A of Interrogatory No. 1 violates the Board's "Order Ruling On

Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is not relevant to the subject matter involved in the proceeding pursuant to the Board's Order, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"B. Any plans, programs, proposals for Federal Government use of the Morris facility as a federal repository for spent fuel."

Response: General Electric objects that Subpart B of Interrogatory No. 1 violates the Board's "Order Ruling on Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is not relevant to the subject matter involved in the proceeding pursuant to the Board's Order, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"C. Security Plans"

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart C as follows:

E.E. Voiland.

"D. License Amendments"

Response: General Electric objects to Subpart D on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or to this subpart, General Electric answers Interrogatory No. 1 Subpart D, as properly limited, as follows:

For SNM License 1265,
D.M. Dawson.

"E. Emergency Plans"

Response: Without waiving any of the objections stated in response to the purported instructions, and without

waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart E as follows:

E.E. Voiland.

"F. Liaison with general population and emergency facilities and state agencies dealing with emergency and evacuation plans."

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart F, as properly limited, as follows:

E.E. Voiland, with the exception of liaison with the general population. General Electric has no liaison with the general population regarding emergency and evacuation plans or emergency facilities in the area of the Morris Operation.

"G. Radiation monitoring or testing."

Response: Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart G as follows:

E.E. Voiland.

"H. Any environmental appraisals or analyses prepared with regard to the use of the Morris facility as a spent fuel storage facility from 1979 forward."

Response: General Electric objects to Subpart H on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or this subpart, General Electric answers Interrogatory No. 1 Subpart H, as properly limited, as follows:

D.M. Dawson, for the Environmental Impact Appraisal Related to The Renewal of Material License SNM-1265 for the Receipt, Storage and Transfer of Spent Fuel at Morris Operation, General Electric Co., Docket No. 70-1308, published: U.S. Nuclear Regulatory Commission, Division of Fuel Cycle and Material Safety, Washington, D.C. June 1980.

"I. Any Interactions with Nuclear Regulatory Commission in regard to the license renewal application."

Response: General Electric objects to Subpart I on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence, because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving any of the objections stated in response to the purported instructions, and without waiving any of the objections applicable to all subparts of Interrogatory No. 1, or this subpart, General Electric answers Interrogatory No. 1 Subpart 1 as follows:

D.M. Dawson.

"J. Any interactions with NRC personnel in regard to current operation of Morris."

Response: General Electric objects to Subpart J on the grounds that it is vague, ambiguous and totally lacking in limitation or specificity, and therefore overly broad and unnecessarily burdensome, and that it seeks, in significant part, information which is neither relevant to the subject matter involved in the proceeding nor reasonably calculated to lead to the discovery of admissible evidence because the subject matter of the interrogatory is beyond the scope of the licensing proceeding and that it is therefore

beyond the scope of discovery permitted by the rules and regulations of the Commission, 10 C.F.R. §2.740(b). Without waiving the objections stated in response to the purported instructions, or the objections applicable to all subparts of Interrogatory No. 1, or to this subpart, General Electric answers Interrogatory No. 1 Subpart J as follows:

D.M. Dawson and E.E. Voiland.

"K. Any interactions with NRC in regard to the License Amendment requested [sic] January 18, 1980."

Response: See Response to Interrogatory 5.

"L. Amount of fuel projected to be stored during license period."

Response: Without waiving any of the objections stated in response to the purported instructions, or any of the objections applicable to all subparts of Interrogatory No. 1, General Electric answers Interrogatory No. 1 Subpart L as follows:

D.M. Dawson.

"INTERROGATORY NO. 2: Identify any officials or representatives of the Nuclear Regulatory Commission with whom GE has had contact in regard to the license renewal proceeding."

Response: General Electric objects that Interrogatory No. 2 is vague, ambiguous and overly broad. Without waiving those objections or the objections stated in response to the purported instructions, and limiting its response to responsible General Electric management personnel, General Electric answers Interrogatory No. 2 as follows:

To the best of General Electric's knowledge, the U.S. Nuclear Regulatory Commission personnel with whom General Electric had contact in regard to the renewal of Materials License SNM-1265, Docket No. 70-1308 were as follows:

A.T. Clark
R.E. Cunningham
F.M. Empson
C.C. Peck
J.P. Roberts
M.U. Rothschild
L.C. Rouse
B.S. Spitalny
R.W. Starostecki
S.A. Treby

"INTERROGATORY NO. 3: Identify any plans or proposals for change in use of the Morris facility which would necessitate a license amendment to the existing license."

Response: General Electric objects that the interrogatory is vague and ambiguous and further objects that the entire interrogatory violates the Board's "Order Ruling on Contentions of the Parties," entered June 4, 1980, which constitutes a limitation order within the meaning of 10 C.F.R. §2.740(b). Alternatively, General Electric objects that the interrogatory is irrelevant to the subject matter involved in the proceeding pursuant to the Board's Order because the subject matter of this interrogatory is beyond the scope of the licensing proceeding, is not reasonably calculated to lead to the discovery of admissible evidence, and is therefore beyond the scope of discovery permitted by the generally applicable provisions of 10 C.F.R. §2.740(b).

"INTERROGATORY NO. 4: Identify all experts to be used as consultants and for witnesses, areas of expertise and contentions to be addressed."

Response: Without waiving any of the objections stated in response to the purported instructions, General Electric responds that as of the date of these responses to these interrogatories, it has not selected or retained any experts to be used as consultants or witnesses regarding this licensing proceeding. General Electric will amend and supplement this response when and in the event that it selects or retains any such expert.

"INTERROGATORY NO. 5: Describe the License Amendment requested on January 18, 1980 and the reasons therefore."

Response: No license amendment was requested on January 18, 1980. In the letter of June 12, 1980 to Office of Nuclear Material Safety and Safeguards, U.S. Nuclear Regulatory Commission from D.M. Dawson, Manager, Licensing and Transportation, General Electric Company, reference to a January 18, 1980 amendment request was made in error. The date in paragraphs one and two of that June 12, 1980 letter should have been January 23, 1980. Notification of the error was transmitted to the NRC and distributed to the service list for this proceeding on July 29, 1980. On January 31, 1980, the amendment request of January 23, 1980 was distributed to the service list for this proceeding. That distribution contained a description of the requested amendment and the reasons therefor.

"INTERROGATORY NO. 6: In regard to Revision C2 of NEDO-21326 Describe [sic] in detail."

Response: As a general response to this entire interrogatory, General Electric states as follows:

The purpose of the proposed amendment of June 12, 1980, "Revised Amendment Request Regarding Changes, Tests and Experiments", is to provide General Electric the same flexibility to make changes in plant and procedures and conduct tests and experiments as is provided in other existing and proposed regulations. As of August 1, 1980, the amendment had not been issued by the NRC.

In addition to provisions to make changes and to perform tests and experiments, the proposed amendment request incorporates the existing provision of 10 CFR 70.32(e) regarding changes which may affect the physical security plan. This provision was incorporated into the request for purposes of fully delineating the processing of all changes. The proposed amendment is intended to make clear the review criteria that must be followed in making contemplated changes and in performing tests.

The changes, tests and experiments which are currently planned are listed below in the response to Interrogatory 6A. The types of changes contemplated in the plant or procedures as they are presently described in the Consolidated Safety Analysis Report, NEDO-21326C (hereinafter "CSAR") would be those which are related to improvements and refinements in the facility and procedures and therefore are related to fuel storage in the existing facility. Tests and experiments will be tests and experiments conducted to gain knowledge of parameters of and those affecting fuel in storage. As explained

in the proposed amendment, activities which are significantly different from present activities, or could produce an effect significantly different from present activities, will be reviewed by the NRC under a General Electric request for approval.

The situation under the proposed amendment if issued will be no different than the situation presently existing at Morris. General Electric is currently permitted to make changes and perform tests that do not require revision of the Operation Specifications (CSAR, Ch. 10) and do not represent an unreviewed safety or environmental issue. The request only seeks to clarify the process to be followed.

"A. All changes, tests and experiments proposed or projected."

Response: General Electric answers Interrogatory No. 6

Subpart A as follows:

Changes, tests and experiments proposed or projected are the following:

Changes

Redesigned unloading pit doorway guard at the unloading basin entrance to the fuel storage basin.

Tests and experiments

1. Measurements of gamma radiation adjacent to individual fuel bundles.
2. Measurements of thermal output of individual fuel bundles and transfer rate of radioactive material from fuel bundles to the basin water.

"B. Which changes in plant, procedures, tests, and experiments related to receipt, storage and transfer of spent fuel are proposed to be performed without prior approval of NRC."

Response: General Electric answers Interrogatory No. 6

Subpart B as follows:

No decision has been made as to whether any of the proposed or projected changes, tests or experiments described in the response to INTERROGATORY No. 6A are such that they may be performed, under the criteria defined in the proposed amendment without prior approval of the NRC.

"C. Any other types of changes in plant operation, procedures, tests or experiments are [sic] proposed or projected to be performed without prior NRC approval."

Response: General Electric answers Interrogatory No. 6

Subpart C as follows:

None

"D. Who will make the determination that changes in plant operation, procedures, tests and experiments will not require a change in the Operation Specifications, Chapter 10 of NEDO-2132 6C, does [sic] not involve unreviewed safety or environmental issues and does [sic] not decrease the effectiveness of the physical security plan; what standards will be applied to make this determination; when will that determination be made."

Response: General Electric answers Interrogatory No. 6

Subpart D as follows:

The determination that changes in plant operations and procedures and tests and experiments will not require a change in the Operation Specifications (CSAR, Ch. 10) and will not involve unreviewed safety or environmental issues will be made by the Morris Operation Plant Safety Committee, with concurrence required by the Manager - Morris Operation and the Manager - Licensing and Transportation. The determination that changes in the physical security plan do not decrease the effectiveness of the plan will be made by

the Manager - Morris Operation with concurrence required by Manager - Licensing and Transportation. The standards applied in making the determination are stated in the proposed amendment. The determination will be made prior to implementation of the change, test or experiment.

"E. What type of NRC review of these changes listed above is anticipated."

Response: General Electric answers Interrogatory No. 6

Subpart E as follows:

It is not known by General Electric what type of NRC review will be made of changes which General Electric has determined do not require prior NRC approval.

"F. What type of reports of the changes shall be made to the NRC, to State agencies, to shareholders and to the public; when will these reports be issued."

Response: General Electric answers Interrogatory No. 6

Subpart F as follows:

Annual reports of the changes which General Electric has determined do not require prior NRC approval will be made and issued according to the proposed amendment. State agencies, shareholders and the public may review the annual reports in either the NRC public document room in Washington, D.C. or in the local public document room in the City of Morris public library.

"G. Will the NRC or any other agency be notified of the inception of any changes, as listed above."

Response: General Electric objects to Subpart G of Interrogatory No. 6 on the grounds that it is vague, ambiguous and redundant. Without waiving any of the objections stated in response

to the purported instructions and without waiving any of the objections applicable to this subpart of Interrogatory No. 6, General Electric answers Interrogatory No. 6 Subpart G as follows:

Regarding those changes, tests or experiments that may be undertaken without an amendment to the license, General Electric will not be required, under the conditions of the proposed amendment, to notify the NRC or any other agency prior to the commencement of the changes, tests or experiments.

"H. Identify NRC regulation [sic] that permits changes in plant operation or procedure without prior NRC approval."

Response: General Electric answers Interrogatory No. 6 Subpart H as follows:

The NRC regulation that permits changes to the physical security plan without prior approval is §70.32(e) Conditions of licenses, Part 70, Domestic Licensing of Special Nuclear Material, Title 10, Code of Federal Regulations.

"INTERROGATORY NO. 7: Identify plans for future storage of spent fuel until the year 2000 including:

- A. Estimated shipment date(s),
- B. Number of assemblies,
- C. Point of origin; owner
- D. Mode of transportation
- E. Number of years of storage estimated."

Response: General Electric answers Interrogatory No. 7

as follows:

Current plans for future storage of spent fuel not yet received at the Morris facility are as follows:

- A. The estimated shipment dates are August 1, 1980 and thereafter at an estimated rate of two assemblies per week until all assemblies are shipped.
- B. The number of assemblies is ninety-one (91).
- C. The point of origin is San Onofre Nuclear Station, Unit 1, San Diego County, California. To the best of General Electric's knowledge and belief, the owners are Southern California Edison Company and San Diego Gas and Electric Company.
- D. The mode of transportation is truck cask.
- E. The period of storage estimated is through December 1986.

"INTERROGATORY NO. 8: In regard to Spent Fuel Storage Problems at Morris:

Response: General Electric objects to the improper assumption and characterization that there have been "problems" regarding the storage of spent fuel at Morris.

"A. Have any fuel rods ruptured, exploded, or otherwise leaked radiation while in storage? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart A as follows:

No fuel rods have ruptured or exploded. There is a slow transfer of certain radioactive materials from some of the fuel to the basin water. This condition is described in "Operating Experience Irradiated Fuel Storage. Morris Operation", NEDO-20969B, §3.3.1 (May 1978) and the CSAR, §5.52.

"B. Have you experienced problems with warped or damaged fuel assemblies in storage? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart B as follows:

There has been no evidence of warping or damage of fuel bundles in storage and therefore no problems have been experienced.

"C. Have you experienced problems with damaged racks? If yes, please explain."

Response: General Electric answers Interrogatory No. 8 Subpart C as follows:

There has been no damage to the present storage system and therefore no problems have been experienced. Three positions in the temporary racks in use between 1972 and 1975 were slightly damaged prior to installation. These three positions were never

used. The temporary racks were replaced by the present storage system in 1976.

"D. Has the liner of the spent fuel pool ever leaked? If yes, please state total amount of coolant lost, ultimate destination of coolant that leaked, and cause of leak."

Response: General Electric answers Interrogatory No. 8

Subpart D as follows:

There is no evidence of leakage through the stainless steel liner except for leakage that occurred when the liner was penetrated as a result of the cask-tip incident, which is described in the CSAR, §8.3, and the leakage that has occurred intermittently at the seal in the expansion gate, which is described in Operating Experience, Irradiated Fuel Storage - Morris Operation, NEDO-20969B2, §2.3.2.

"E. Has the pool radioactive waste system ever failed? If yes, please explain."

Response: General Electric objects to Subpart E of this interrogatory on the grounds that it is vague and ambiguous. Without waiving these objections, General Electric answers Interrogatory 8 Subpart E as follows:

The low activity waste vault (that stores radioactive materials collected by the pool cleanup system and the cask flush system) has never failed. The pool cleanup system (that removes radioactive materials from the pool water) has never failed to perform its function of maintaining water quality within the limits of the CSAR, Ch. 10.

"F. Has the pool coolant circulation system ever failed? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart F as follows:

There have been no failures of the function of the cooling system. The cooling system was damaged by freezing in an incident that occurred January, 1977. This incident is described in "Operating Experience, Irradiated Fuel Storage-Morris Operation," Morris, Illinois NEDO-20969B2, §3.2.2

"G. Have you had problems with "crud" buildup on the assemblies or in the pool? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart G as follows:

No

"H. Has the spent fuel pool ever been drained? If yes, please explain."

Response: General Electric answers Interrogatory No. 8

Subpart H as follows:

No

"I. Has the radiation level [sic] of the spent fuel pool ever exceeded allowable limit? If yes, please explain."

Response: General Electric objects to Subpart I of this interrogatory on the grounds that it incorrectly assumes that there is an allowable limit for the radiation level of the spent fuel pool. Without waiving this objection, General Electric answers Interrogatory No. 8 Subpart I as follows:

The concentration of radioactivity in the spent fuel pool has

never exceeded the limit specified in the CSAR, Ch. 10.

"J. Have fuel assemblies ever been dropped during handling? If so, please list dates, number of assemblies dropped, and extent of damage, if any."

Response: General Electric answers Interrogatory No. 8

Subpart J as follows:

Fuel bundles have never been dropped outside their storage basket. However, on two occasions, October 11, 1972 and November 11, 1972, while placing a fuel bundle in a storage basket the fuel bundle became disengaged from the grapple allowing it to drop an estimated one foot onto the bottom of the storage basket. Examinations of the fuel bundle and baskets revealed that no damage was sustained. The fuel handling tools were redesigned in 1973 and no further fuel bundle drops have been experienced.

"K. Please describe any problems encountered in storing spent fuel not described in response to the above questions."

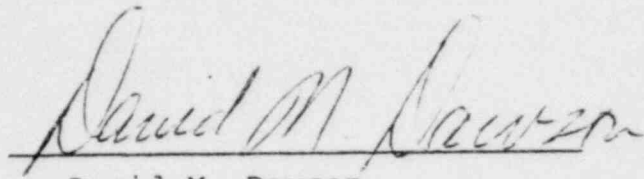
Response: General Electric objects that Interrogatory No. 8

Subpart K is vague and ambiguous and improper to the extent that it exceeds the scope of this proceeding and the limits upon discovery set forth in 10 C.F.R. §2.740. Without waiving any of the foregoing objections, General Electric answers Interrogatory No. 8

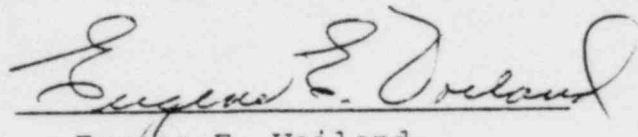
Subpart K as follows:

None

Respectfully submitted,
GENERAL ELECTRIC COMPANY



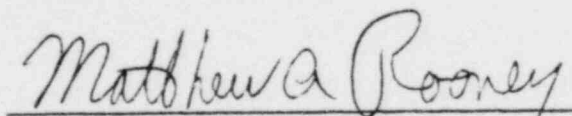
David M. Dawson



Eugene E. Voiland



Ronald W. Szwajkowski
One of Its Attorneys



Matthew A. Rooney
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David M. Dawson
General Electric Co.
175 Curtner Avenue
San Jose, CA 95125
408*925-6330

Academic:

Bachelor of Science, Physics, 1958, Washington and Lee University,
Lexington, VA

Graduate study, Physics, 1959, Vanderbilt University, Nashville, TN

Fellowship:

Atomic Energy Commission Fellowship, Radiological Physics 1958-1959,
Vanderbilt University and Oak Ridge National Laboratory.

Professional Memberships:

Member, Northern California Chapter of Health Physics Society

Member, American Nuclear Society Standards Subcommittee 8, "Fissionable
Materials Outside Reactors" 1966 to present.

Alternate American Nuclear Society Representative to American National
Standards Institute Committee N14, "Packaging and Transportation of
Fissile and Radioactive Materials" 1969 to present.

Registered Professional Nuclear Engineer, California, NU 2040, 1977

Employment:

May 1975 to Present

General Electric Company
Nuclear Energy Business Group
Spent Fuel Service Operation
Supervisor, J.E. Van Hoomissen, Manager, SFSO
Title: Manager, Licensing and Transportation

Responsible for NRC licensing of fuel storage facilities
irradiated fuel shipping casks and high density fuel storage
systems. Also responsible for overall transportation system
for irradiated fuel, including design of equipment and trans-
portation planning. Responsibilities include review of
designs of facilities and equipment to assure compliance with
regulatory requirements, preparation of license submittals,
promulgation of license conditions and require-
ments to operating and design components and review of compliance
with these conditions and requirements.

May 1974 to May 1975

General Electric Company
Nuclear Energy Division
Boiling Water Reactor Projects Department
Safety and Licensing Operation
Supervisor, L.S. Gifford, Manager Regulatory Operations
Title: Senior Engineer, Licensing

Responsible for liaison between headquarters project
and operating reactor licensing personnel and AEC/
NRC regulatory staff.

May 1970 to May 1974

General Electric Company
Nuclear Energy Division
Nuclear Fuel Manufacturing
Supervisor, H.H. Klepfer and others
Title: Manager, Nuclear Safety and Licensing

Responsible for establishing and maintaining radio-
logical safety and criticality safety programs.
Responsibilities included technical evaluation of
designs of equipment and facilities to assure com-
pliance with regulatory requirements, preparation of
license submittals, promulgation of license con-
ditions and regulatory requirements to operating and
design components, review of compliance with these
conditions and requirements, and development and
implementation of nuclear safety programs.

September 1965 to May 1970

General Electric Company
Nuclear Energy Division
Nuclear Fuels Engineering
Supervisors, T. Trocki and others
Title: Criticality Safety Engineer

Responsibility for evaluation of the criticality
safety of fuel manufacturing operations fuel develop-
ment activities, fuel storage, and fuel transportation
packages.

May 1962 to September 1965 (and June 1959 to November 1961)

Pratt and Whitney Aircraft Company
Connecticut Advanced Nuclear Engineering Laboratory (and
Connecticut Aircraft Nuclear Engine Laboratory)
Health and Safety Engineering Department
Supervisor: W.F. Patton and others
Title: Nuclear Safety Engineer (and Industrial Hygienist)

Responsible for evaluation, approval and review
for compliance with requirements of facilities and
equipment for fuel fabrication, fuel storage and fuel
development. Responsibilities included review of
fissile material and waste shipments for compliance
with requirements. (Responsible for providing services
for health physics, industrial hygiene and safety
engineering for areas handling radioactive materials).

November 1961 to May 1962

University of California
Lawrence Berkeley Radiation Laboratory
Health Chemistry Department
Supervisor: P.W. Howe
Title: Technical Coordinator

Completed training course in radiation safety and
transuranic element handling procedures.

Courses

Criticality and Criticality Safeguards	1960	University of California
Fast Reactor Technology	1967	General Electric
Nuclear Engineering Fundamental, Part II,	1968	General Electric
Nuclear Power Safety	1975	Georgia Institute of Technology

Papers

- "Criticality Safety in Fuel Handling at Reactor Sites", GE I&SE Seminar, 1972.
- "Health Physics Problems of Fuel Fabrication", North Carolina HPS, Meeting, 1972.
- "Incineration of Low Uranium Content Wastes", ANS Meeting, 1973, (with G. Sakash).
- "Moderation Control for Purposes of Criticality Safety", ANS Meeting, 1976.

Eugene E. Voiland
Morris Operation
General Electric Company
7555 E. Collins Road
Morris, IL 60450
815*942-5590

Academic:

Bachelor of Science, 1947, Seattle College, Seattle, WA

Graduate Study, Physical Chemistry, 1947-1951, University of
Notre Dame, Notre Dame, IN

Fellowship:

Atomic Energy Commission Pre Doctoral Fellowship in the Physical
Sciences, 1948-1950, University of Notre Dame.

Professional Memberships:

Member, American Nuclear Society

Member and Director, Chicago Section, American Nuclear Society

Member, American Association for the Advancement of Science

Other Memberships:

Public Member, Illinois Energy Resources Commission, Springfield, IL

Vice Chairman, Board of Directors, Three Rivers Manufacturers
Association, Joliet, IL.

Employment:

March 1975 to Present

General Electric Company
Nuclear Energy Business Group
Spent Fuel Services Operation (SFSO)
Supervisor, J.E. Van Hoomissen, Manager, SFSO
Title: Manager, Morris Operation

Responsible for overall management of Morris
Operation, General Electric's spent fuel receiving
and storage facility at Morris, Illinois and spent
fuel shipping containers (casks). Activities for
which he has management responsibility include:

operation of the spent fuel storage pools;
operation of general plant systems;
engineering design, fabrication, and installation services;
supporting services such as quality assurance and quality control, radiological and industrial safety, emergency responses, analytical laboratory, physical security and safeguards systems, and purchasing;
and field service activities related to use of the IF-300 cask at reactors.

Note: Additional responsibilities include maintenance of a formal management system of instructions, manuals, and procedures; administration of NRC Licenses and Certificates of Compliance; and assuring compliance with all applicable regulatory requirements.

December 1973 to March 1975

General Electric Company
Nuclear Energy Division
Midwest Fuel Recovery Plant
Supervisor, B.F. Judson, Manager Midwest Fuel Recovery Plant
Title: Manager, Safety and Quality Assurance

Responsible for site (AEC and State) licensing and compliance activities, radiological and industrial safety, quality assurance and nuclear materials management.

December 1971 to December 1973

Argonne National Laboratory
Chemical Engineering Division
Argonne, IL
Supervisors, R.C. Vogel, L. Burris
Title: Manager, Analytical Laboratory

Management of a diversified analytical laboratory, including, plutonium, mass spectrometric, x-ray, gas chromatographic and general chemical laboratories.

July 1968 to November 1971

Battelle Memorial Institute
Pacific Northwest Laboratories
Richland, WA
Supervisors, J.J. Cadwell, W.D. Richmond, W.D. Widrig
Title: Senior Research Associate

Technically responsible for Laboratory radioactive waste management activities. Representative for Battelle on the AEC Richland Operations/Contractor Waste Management Advisory Board. Special studies of various kinds.

October 1964 to July 1968

General Electric Company (through December 1964)
Battelle Northwest (from January, 1965)
Supervisors, W.H. Reas, M.T. Walling, D.R. deHalas
Title: Manager, Chemical Research Subsection

Managed diversified R&D organization comprising four units. Work primarily associated with nuclear field including work in (1) separations chemistry; solvent extraction, ion exchange, fission product recovery, nuclear waste processing and molten salt processes, (2) basic physical and inorganic chemistry of actinide elements, (3) remote analytical instrumentation and radiochemical analytical research, (4) hot cell complex used for recovery of ^{147}Pm , ^{237}Np , ^{238}Pu separation and purification and process demonstration and (5) personally served as BNW Program Director for site AEC Division of Isotope Development Programs. (105 scientists, engineers and technicians).

November 1961 to October 1964

General Electric Company
Hanford Atomic Products Operation
Reactor and Fuels Section
Supervisor, F.W. Albaugh
Title: Manager, Materials Research and Services Subsection

Managed 3-component organization performing (1) R&D in radiation effects and chemical reactions of nuclear graphite, (2) metallographic services and (3) metallurgical and physical testing of irradiated fuels and materials. (85 scientists, engineers and technicians).

July 1955 to November 1961

General Electric Company
Hanford Atomic Products Operation
Chemical Research and Development Section
Supervisor, W.H. Reas
Title: Supervisor, Heavy Element Chemistry Unit

July 1955 to November 1961 - cont'd.

Directed research to actinide element chemistry, separations, processes, ion exchange, solvent extraction and molten salt chemistry. (10-15 scientists and technicians).

October 1951 to July 1955

General Electric Company
Hanford Atomic Products Operation
Chemical Research and Development Section
Supervisors, O.F. Hill, W.H. Reas
Title: Research Scientist

Conducted research in nuclear fuel reprocessing, separations chemistry, solvent extraction and and isotope separation.

Papers

"Management of High Level Radioactive Wastes", Eighth Annual National Conference on Radiation Control, Springfield, Illinois, May 2-7, 1976.

"Control of Nuclear Fuel Storage Basin Water Quality by Use of Powdered Ion Exchange Resins and Zeolites", ASME Paper 77-JPGC-NE-15, ASME/IEEE Joint Power Generation Conference, Long Beach, California, September 18-21, 1977 (with L.L. Denio, D.E. Knowlton).

"Experience in Operation of the Morris Operation Storage Facility", American Nuclear Society Executive Conference on Spent Fuel Policy and Its Implications, Buford, Georgia, April 2-5, 1978.

Testimony before Illinois Legislature: "Experience in Operation of an Independent Fuel Storage Facility", June 7, 1979. "About Away-From-Reactor Spent Fuel Storage", August 29, 1979.

Testimony before California Energy Resources and Development Commission: "Experience in Operation of an Independent Fuel Storage Facility", March 10, 1977.

Various classified reports related to separations chemistry.

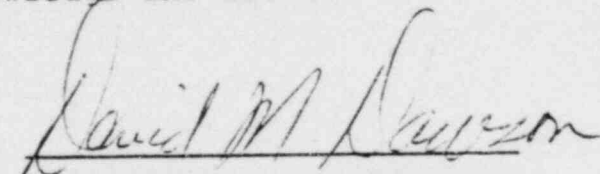
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
GENERAL ELECTRIC COMPANY) Docket No. 70-1308
)
(GE Morris Operation Spent) (Renewal of SNM-1265)
Fuel Storage Facility))

VERIFICATION OF DAVID. M. DAWSON

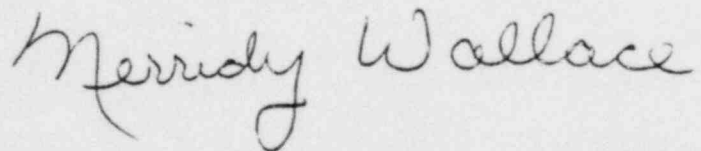
David M. Dawson, being duly sworn, deposes and says as follows:

1. That he is employed as Manager, Licensing and Transportation, General Electric Company, Spent Fuel Services Operation, San Jose, California, and that he is duly authorized to answer the interrogatories numbered 1C, 1D, 1E, 1F, 1G, 1H, 1I, 1J, and 1L; 2; 5; 6, 6B, 6C, 6D, 6E, 6F, 6G, 6H and 7 propounded by the State of Illinois under date of service of July 11, 1980.
2. That the above-mentioned and attached answers are true and correct to the best of his knowledge and belief.

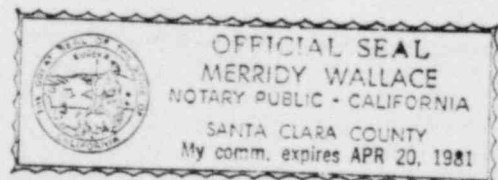


David M. Dawson

Subscribed and sworn to before me this thirty-first day of July, 1980
in San Jose, County of Santa Clara, California.



My Commission expires April ³⁰ ~~21~~ ^{mw}, 1981.



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

In the Matter of)	Docket No. 70-1308
)	
GENERAL ELECTRIC COMPANY)	(Renewal of SNM-1265)
)	
(GE Morris Operation Spent)	
Fuel Storage Facility))	

VERIFICATION OF EUGENE E. VOILAND

Eugene E. Voiland, being duly sworn, deposes and says as follows:

1. That he is employed as Manager, Morris Operation, General Electric Company, Morris, Illinois and that he is duly authorized to answer the interrogatories numbered 6A, 8 propounded by the State of Illinois under date of service of July 11, 1980.
2. That the above-mentioned and attached answers are true and correct to the best of his knowledge and belief.

Eugene E. Voiland
 Eugene E. Voiland

Subscribed and sworn to before me this thirty-first day of July, 1980
 in San Jose, County of Santa Clara, California

Merridy Wallace



My Commission expires April ²⁰~~21~~ 1981. mw

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 "RESPONSE OF GENERAL ELECTRIC COMPANY TO INTERVENOR'S INTERROGATORIES, FIRST SET, TO APPLICANT" 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 August 4, 1980:

Andrew C. Goodhope, Esq., Chairman
Atomic Safety and Licensing Board
3320 Estelle Terrace
Wheaton, Maryland 20906

Dr. Linda W. Little
Atomic Safety and Licensing Board
5000 Hermitage Drive
Raleigh, North Carolina 27612

Dr. Forrest J. Remick
Atomic Safety and Licensing Board
305 East Hamilton Avenue
State College, Pennsylvania 16801

Atomic Safety and Licensing Appeal
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Bridget L. Rorem
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Everett J. Quigley
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United States Nuclear
Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555


Matthew A. Rooney