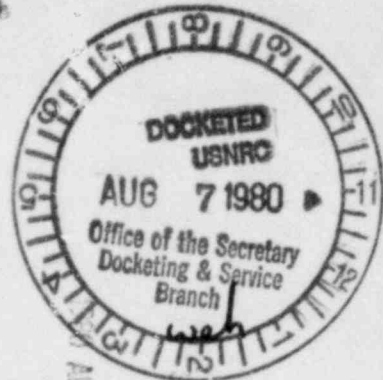


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of General Electric Company,
(G.E. Morris Spent Fuel Storage Facility License Renewal)

Docket No. 70-1308

AUG 7 PM 2 10

RECEIVED DISTRIBUTION SERVICES UNIT

OBJECTIONS AND ANSWERS TO INTERROGATORIES
PROPOUNDED BY STAFF

Intervenor PEOPLE OF THE STATE OF ILLINOIS ("Illinois")
by TYRONE C. FAHNER, Attorney General of the State of Illinois
responds to the interrogatories propounded by the staff as follows:

1. Illinois generally objects to the Interrogatories propounded by staff as being unduly burdensome and oppressive in that the staff has submitted 27 pages of Interrogatories, some 68 separate questions, to be answered within a two week period.

2. Without waiving this objection Illinois has attempted to answer these Interrogatories within the time allotted by the Board. Due to the length of the Interrogatories Illinois has not repeated the questions before giving its responses.

3. All documents referred to herein are available for staff examination in the Office of the Attorney General, 188 West Randolph, Suite 2315, Chicago, Illinois 60601.

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ADD:
H. Bristow
NMSS LA

8008080 440 C

4. "MHB Report" means a study entitled "Technical Review of Risk Due to Expansion of the Morris Operation Spent Nuclear Fuel Storage" by MHB Technical Associates dated February 1979.

RESPONSES

I. GENERAL INTERROGATORIES

G-1. At this time Illinois does not know who, if anyone, it will call as a witness in this proceeding.

G-2. See response to Interrogatory G-1.

G-3. See response to Interrogatory G-1.

G-4. See the documents specifically identified herein.

Any other documents currently in the possession of Illinois are available for inspection.

G-5. See the contentions and the specific answers herein.

G-6. Unknown at this time but may include the documents specifically identified herein.

INTERROGATORIES RELATED TO SPECIFIC CONTENTIONS

C1-1. Yes.

C1-2. Due to the proximity of the two facilities a class 9 accident or similar incident at Dresden could require evacuation of personnel at the Morris facility thus removing all human control and safeguards. In addition the same incident e.g. a tornado could cause the simultaneous release of radiation at both facilities.

C1-3. See answer to C1-2.

C1-4. See answer to C1-2.

C1-5. No answer required.

C1-6. "Consequences" means results or effects. See answer to C1-2.

C1-7. Illinois objects that this question calls for pure speculation, requests facts beyond the knowledge of Illinois, is beyond the scope of discovery, and is the burden of the applicant not Illinois.

C1-8. "Risks" means possibilities of harm or danger.

C1-9.

(a) any object which could be carried by a tornado and which could breach the walls of the facility or in any other way disrupt safe activities at the facility thus causing or allowing a release of radioactivity.

See also MHB Report.

(b) See answer to (a) above.

(c) See answer to (a) above.

(d) See answer to (a) above.

(e) See objection to C1-7.

C1-10.

(a) See MHB Report

(b) "Building structure" is self-explanation.

"Rift" is any break, breach or split. See MHB Report.

- (c) See MHB Report.
- (d) See MHB Report.
- (e) See MHB Report.
- (f) See MHB Report.
- (g) See objection to Cl-7.

Cl-11.

(a) Any rift, breach, break, crack or rupture in the facility structure, including the pool and piping or any damage to the casks, baskets or fuel causing or allowing the release of radioactivity.

- (b) See answer to (a) above and MHB Report.
- (c) See answer to (a) above and MHB Report.
- (d) See objection to Cl-7.

Cl-12.

- (a) See MHB Report.
- (b) See MHB Report.
- (c) See MHB Report.
- (d) See objection to Cl-7.

Cl-13.

(a) through (d). Illinois objects on the ground that this portion of contention 1 was not proposed by it and it has no knowledge as to what other parties mean by the term.

Cl-14.

- (a) through (d). See objection to Cl-13.

Cl-15.

- (a) through (d). See Objection to Cl-13.

C1-16.

(a) (c) (d) and (e). See objection to C1-13.

(b) See MHB Report.

C1-17.

(a) through (d). See objection to C1-13.

CONTENTION 2

C2-1. See MHB Report.

C2-2. "Advances in the technology of explosives"

refers to improvement in composition, size, effectiveness, methods of concealment and transportation and techniques and devices for detonation. These advances make sabotage more effective, easier to accomplish, and make it easier for a saboteur to plant, conceal and detonate explosives and then to escape. These make sabotage more effective and of less risk to a saboteur and thus more probable.

C2-3. See objection to C1-7.

CONTENTION 3

C3-1. "Personnel" means those persons working at the facility whether employed by General Electric or not.

C3-2. See MHB Report.

C3-3.

(a) See MHB Report

(b) Illinois objects on the ground that this Interrogatory is beyond the scope of discovery in that "families" is not relevant or material to Contention 3 (a).

C3-4.

(a) See MHB Report.

(b) See MHB Report.

C3-5.

(a) See MHB Report.

(b) See MHB Report.

(c) See MHB Report.

C3-6.

(a) "Compaction" means methods of increasing fuel storage by replacing present racks with new racks which allow for additional numbers of assemblies to be stored by decreasing the amount of space between assemblies.

(b) Numerous documents support this all of which are available for inspection. Illinois relies principally on the following:

1. Deposition of Michael J. Lawrence taken January 21, 1980 in the cause of People v. Department of Energy, No. 79-C-1427 (N.D. Ill.)

2. Deposition of Sheldon Meyers taken December 12, 1979 in the same cause.

3. Deposition of Bertram Wolfe taken December 3, 1979 in the same cause.

4. Response to Request for Admission by Department of Energy filed in the same cause on March 10, 1980.

5. "Alternatives for DOE Storage of Spent Fuel at Morris Operation" NEDC-24641 dated April 1979.

(c) Exact levels are unknown since they depend on the type of changed operation, amount of additional fuel etc.

(d) Illinois objects on the ground that this interrogatory is beyond the scope of discovery in that "families" is not relevant or material to Contention 3(d).

Contention 3(e)

C3-7.

(a) See MHB Report.

(b) See MHB Report.

(c) See objection to C1-7.

(d) See MHB Report, General Electric document entitled "Status of Existing License" dated February 21, 1979.

(e) See objection to C1-7.

CONTENTION 4

C4-1.

(a) The CSAR does not so indicate.

(b) The term means both the beginning date and time require to complete decontamination.

(c) See objection to C1-7.

(d) The contention speaks for itself.

As to the last clause of this interrogatory (beginning "and describe what..." see objection to C1-7.

C4-2.

(a) Illinois has no evidence to demonstrate that General Electric will or will not be financially capable.

(b) See 10 CFR 70-22, note after (a)(8).

C4-3.

(a) The words are used in their common dictionary meanings.

(b) See MHB Report.

(d) [sic] See MHB Report.

C4-4.

(a) See MHB Report.

(b) See MHB Report.

(c) See MHB Report.

(d) See MHB Report.

(e) See MHB Report.

CONTENTION 5

C5-1. See MHB Report.

C5-2.

(a) The term is from Figure 9-4 "Emergency Plan Relations for Morris Operation," NEDO-21326C, January 1979 and means the same as in that document.

(b) None that Illinois is now aware of.

C5-3. See objection to C1-7.

CONTENTION 6

C6-1.

(a) Illinois objects on the ground that the word "area" was not proposed by it and Illinois has no knowledge as to what other parties mean by the term.

(b) Illinois has not made that assertion.

C6-2.

(a) Illinois objects on the ground that the term "large numbers of people" was not proposed by it and Illinois has no knowledge as to what other parties mean by it.

(b) Illinois has not made that assertion.

See also objection to C6-2(a).

C6-3. Illinois objects on the ground that it did not make the statement attributed to it and Illinois has no knowledge as to what other parties mean by it.

C6-4. Illinois objects on the ground that it did not propose these terms and has no knowledge as to what other parties mean by them.

C7-1. Yes. See MHB Report and the answers given above.

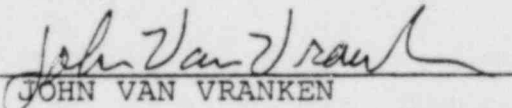
C7-2.

(a) Illinois is unable to respond to this interrogatory because it has been unable to adequately study NUREG-0695 as of this date.

- (b) See response to (a) above.
- (c) No.
- (d) No response required.

PEOPLE OF THE STATE OF ILLINOIS

TYRONE C. FAHNER
Attorney General
State of Illinois

BY: 
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Environmental Control Division
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DATED: August 4, 1980

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

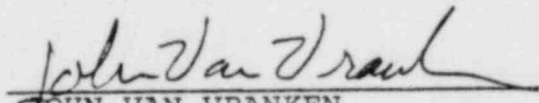
A F F I D A V I T

I, JOHN VAN VRANKEN, being first duly sworn on oath,
depose and state:

1. I am a duly appointed and sworn Assistant Attorney
General of the State of Illinois.

2. The answers to the Interrogatories propounded by
the Staff are true and correct to the best of my knowledge,
information and belief.

FURTHER AFFIANT SAYETH NOT.

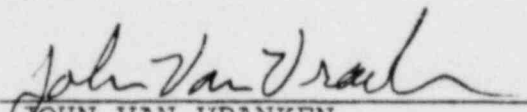

JOHN VAN VRANKEN

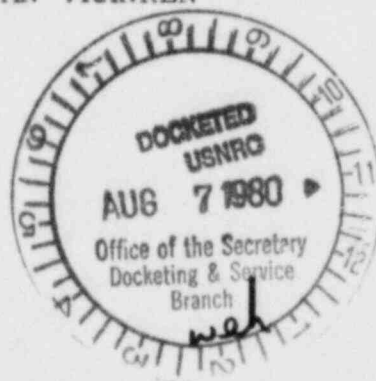
SUBSCRIBED AND SWORN TO
BEFORE ME THIS 4th DAY
OF AUGUST, 1980.


NOTARY PUBLIC

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of August, 1980 I served copies of the foregoing Objections and Answers to Interrogatories Propounded by Staff, upon each of the persons named on the attached Service List, by causing copies to be deposited in the U.S Mail, in envelopes properly addressed and sealed, first class postage prepaid.


JOHN VAN VRANKEN



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