

Oct 2, 1980

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF)
DAIRYLAND POWER COOPERATIVE)
(LA CROSSE BOILING WATER)
REACTOR))

Docket No. 50-409
(Show Cause)

LICENSEE'S INTERROGATORIES
TO CONSOLIDATED INTERVENORS

Pursuant to 10 C.F.R. §2.740b and the discovery schedule established at the September 11, 1980 prehearing conference, Dairyland Power Cooperative (Dairyland or DPC), the licensee in the above-captioned proceeding, hereby propounds the following interrogatories to be answered by Consolidated Intervenorors (i.e., Frederick M. Olsen and the Coulee Region Energy Coalition (CREC)) by October 20, 1980, in writing and under oath.

These interrogatories are continuing in nature and must be supplemented to include information thereafter acquired in accordance with the requirements of 10 C.F.R. §2.740(e).

1. Please state the name and address of each person whom you have engaged or utilized to conduct any reviews, analyses, tests, or studies related to the liquefaction potential of the soils at the LACBWR site and the two issues

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identified in the Order to Show Cause issued by the Nuclear Regulatory Commission on February 25, 1980, and as to each such person please provide the following:

- (a) his or her professional qualifications, by way of education and/or experience, as applicable;
- (b) the subject matter of each such review, analysis, test or study;
- (c) a description of each such review, analysis, test, or study and a summary of the results of same;
- (d) a description and identification of any written reports prepared as a result of each such review, analysis, test or study.

2. With respect to any individuals whom you intend to introduce as witness to testify on your behalf with regard to these issues in any public hearings which may be held in this proceeding, please provide:

- (a) their qualifications, particularly as they relate to these issues;
- (b) all technical papers either written or published by them;
- (c) all books written and/or published by them;
- (d) all statements or testimony (both written and oral) given by them in other proceedings relating to soil liquefaction;
- (e) all responses to interrogatories answered by them or responses which they assisted in the preparation of relating to soil liquefaction in other proceedings.

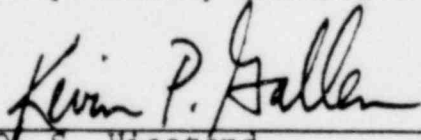
3. By the terms of the Order, Dairyland was ordered to show cause why it should not "submit a detailed design proposal for a site dewatering system to preclude the occurrence of liquefaction in the event of an earthquake with peak ground accelerations of 0.12 or less." Is it your position that liquefaction will occur at the LACBWR site in the event of an earthquake with peak ground accelerations of 0.12g or less? If so, why? Please provide all documentation and data on which you rely in support of your position.

4. Do you agree that there is no need to design and install a site dewatering system at the LACBWR site if it can be shown that liquefaction will not occur in the event of an earthquake with peak ground acceleration of 0.12g or less? If not, why not? Please provide all documentation and data on which you rely in support of your answer.

5. Please state in detail (a) your understanding of what soil liquefaction is and (b) your position on the liquefaction potential of the LACBWR site. Provide all documentation and data on which you rely in support of your answer.

Respectfully submitted

By
for



O. S. Hiestand
Attorney for
DAIRYLAND POWER COOPERATIVE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
DAIRYLAND POWER COOPERATIVE)	Docket No. 50-409
(La Crosse Boiling Water)	(Liquefaction)
Reactor))	(Show Cause)

CERTIFICATE OF SERVICE

Service has on this day been effected by
personal delivery or first class mail on the following
persons:

Charles Bechhoefer, Esq., Chrm.
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Board Panel
U.S. Nuclear Regulatory
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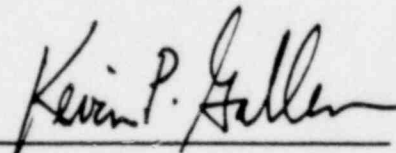
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for O. S. Hiestand