

10/2/80

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

In the Matter of

DAIRYLAND POWER COOPERATIVE
(La Crosse Boiling Water Reactor)

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Docket 50-409 SC
(Order to Show Cause)

NRC STAFF INTERROGATORIES TO CONSOLIDATED PARTIES
CREC AND OLSEN

The Nuclear Regulatory Commission (NRC) Staff hereby requests that the consolidated parties, the Coulee Region Energy Coalition (CREC) and Frederick M. Olsen III, answer the following interrogatories, separately and fully in writing under oath or affirmation. These interrogatories are posed pursuant to 10 CFR 2.740b and should be answered by October 20, 1980, pursuant to the Board's announced schedule for this proceeding. See Prehearing Conference Order at 14. For each response to the interrogatories, identify the person or persons who prepared or contributed to the preparation of the response.

For all documents that are identified in response to the interrogatories, please identify the document by author, title, date, the general subject matter of the document, and the place where a copy of the document may be obtained. The NRC Staff further requests pursuant to 10 CFR 2.741 that the consolidated parties provide copies of, or make available for inspection and copying, the documents identified in response to the interrogatories.

Interrogatories

1. Do you contend that Dairyland Power Cooperative should design and install a site dewatering system to withstand an earthquake producing a ground surface level peak acceleration of 0.12g? If the answer is "yes", then

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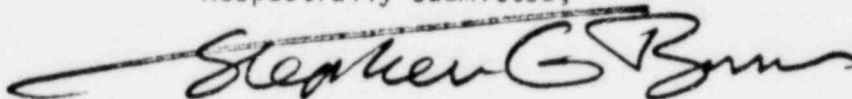
provide the following information:

- a. Identify and describe all factual data on which you rely in support of this contention; and
 - b. Identify each document on which you rely in support of this contention. When identifying a document, refer to the specific pages or sections of the document which support your position.
2. Identify each statement in the NRC Staff's Safety Evaluation Report (SER) of August 29, 1980, with which you disagree. For each statement so identified,
- a. Identify and describe the bases for your disagreement with the statement;
 - b. Identify the factual data which you believe support your basis for disagreement with each statement in the NRC Staff's SER; and
 - c. Identify each document on which you rely in support of your disagreement with the statement. When identifying a document refer to the specific pages or sections of the document which support your position.
3. What effect does the fact that piles have been driven under the reactor building and the turbine building have on your position concerning the need for a site dewatering system?
- a. Identify and describe all factual data on which you rely in support of your position.

- b. Identify each document on which you rely in support of your position. When identifying a document, refer to the specific pages or sections of the document which support your position.

4. If the material under the turbine building and the reactor building are adequately safe against liquefaction for an earthquake with a peak ground acceleration of 0.12g, do you contend that a site dewatering system is necessary for the La Crosse site? If your answer is "yes", then provide the following information:
 - a. Identify and describe the bases for your contention, and identify and describe the factual data which support these bases; and
 - b. Identify the documents on which you rely in support of your contention.

Respectfully submitted,

A handwritten signature in black ink, reading "Stephen G. Burns". The signature is written in a cursive style with a long, sweeping underline that extends to the left.

Stephen G. Burns
Counsel to NRC Staff

Dated at Bethesda, Maryland
this 2nd day of October, 1980.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the NRC STAFF INTERROGATORIES TO CONSOLIDATED PARTIES CREC AND OLSEN in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 2nd day of October, 1980.

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