

DAIRYLAND POWER COOPERATIVE

(La Crosse Boiling Water Reactor)

Docket No. 50-409 SC (Order to Show Cause)

NRC STAFF'S SECOND ROUND INTERROGATORIES TO THE CONSOLIDATED PARTIES

The NRC Staff hereby requests that the consolidated parties in this proceeding, the Coulee Region Energy Coalition and Fredrick M. Olsen III, answer the following interrogatories separately and in writing under oath or affirmation. These interrogatories are posed pursuant to 10 C.F.R. 2.740b and should be answered by March 27, 1981, as established under the Board's schedule. <u>Prehearing Conference Memorandum</u> at 2 (Jan. 6, 1981). 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, identify the document by author, title, date, general subject matter, specific page or section references, and place where a copy of the document may be obtained. The NRC Staff further requests under 10 C.F.R. 2.741 that the consolidated parties provide copies of, or make available for inspection and copying, the documents identified in response to the interrogatories.

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

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1. Identify the seismic parameters which you contend should be applied in assessing liquefaction potential at the La Crosse site.

(a) Identify and describe all factual data on which you rely in support of this contention;

(b) Explain how this factual data supports the seismic parameters which you contend should be applied:

(c) Identify each document on which you rely in support of your contention.

2. Identify the bases, if any, for your disagreement with the Staff's reliance in reviewing liquefaction potential on an earthquake of magnitude 5.0 to 5.5 at a distance of less than 25 KM producing a peak ground acceleration of 0.12g and an equivalent duration of 5 cycles at the La Crosse site.

 (a) Identify and describe all factual data on which you rely in support of these bases;

(b) Explain how this factual data supports each of these bases;

(c) Identify each document on which you rely in support of each of these bases.

3. State the name and address of each person whom you have engaged to conduct any reviews or analyses related to the seismicity of the La Crosse site. As to each person, provide the following information:

(a) Professional qualifications, including educational history, technical training, and work experience;

(b) Subject matter of any review or analysis performed by the person;

(c) A description of any review or analysis performed by the person and a summary of the results of the review or analysis; and

(d) An identification of any written reports or documents prepared by the person as part of any such review or analysis.

Respectfully submitted.

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Stephen G. Burns Counsel for NRC Staff

Dated at Bethesda, Maryland this 25th day of February, 1981

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BUARD

In the Matter of

DAIRYLAND POWER COOPERATIVE (La Crosse Boiling Water Reactor) Docket No. 50-409 SC (Order to Show Cause)

CEF., FICATE OF SERVICE

I hereby certify that copies of the NRC STAFF'S SECOND ROUND INTERROGA-TORIES TO THE CONSOLIDATED PARTIES 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 25th day of February, 1981.

Charles Bechhoefer, Esq.* Chairman Atomic Safety & Licensing Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

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