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June 8, 1981

Bruce Meyerson, Esq.  
Arizona Center for Law  
in the Public Interest  
112 N. 5th Avenue  
Phoenix, Arizona 85003

Re: First Set of Interrogatories  
Palo Verde Nuclear Generating Station



Dear Bruce:

Enclosed is a document entitled "Stipulation Regarding Intervenor's and Joint Applicants' First Set of Interrogatories" (Stipulation). The purpose of this Stipulation is to set forth the agreement reached between Intervenor and Joint Applicants at the offices of Snell & Wilmer on June 4, 1981. Except as noted in Item II.5 of the Stipulation, it is our understanding that the Stipulation is intended to obviate the need for either Intervenor or Joint Applicants to file objections or motions to compel respecting the two parties' respective first set of interrogatories. It is our understanding that the key basis of the Stipulation is that a second set of interrogatories will be permitted, although the schedule for such second set has not yet been established.

If you concur that the Stipulation adequately sets forth the parties' agreement, please so indicate by signing in the space provided below. I will then forward this letter, together with the enclosed Stipulation, to the members of the Atomic Safety and Licensing Board and Henry J. McGurran.

Sincerely,

*Charles A. Bischoff*  
Charles A. Bischoff

CAB:jaw  
Enclosure

I concur that the enclosed Stipulation adequately sets forth the agreement reached by the Intervenor and Joint Applicants on June 4, 1981.

*Bruce Meyerson*  
BRUCE MEYERSON

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STIPULATION REGARDING ANSWERS TO  
INTERVENOR'S AND JOINT APPLICANTS'  
FIRST SET OF INTERROGATORIES

I. Intervenor's First Set of Interrogatories to Joint Applicants

1. With respect to those interrogatories that ask for identification of each person who knows or claims to have knowledge or information establishing or tending to establish Joint Applicants' answers (approximately one-third of Intervenor's interrogatories fall into this category), it will be sufficient if Joint Applicants identify the key person or persons having responsibility over the subject matter of the question.

2. With respect to those interrogatories that ask for identification of every document that supports or tends to support Joint Applicants' answers (approximately one-third of Intervenor's interrogatories fall into this category), the "working papers" of Joint Applicants need not be identified. It is understood that Intervenor is free to renew her request for identification of supporting documents, including "working papers", in a second set of interrogatories. It is anticipated, however, that Intervenor will be in a better position to focus her concerns in a second set of interrogatories, which, in turn, may have the effect of reducing the number of documents that need to be identified.

3. Interrogatory 19. The answer to this interrogatory will consist of identification of each operating C-E reactor along with its NRC Docket number. To the extent that Intervenor is unable to obtain the requested information from the NRC, she may resubmit the interrogatory. By such agreement Joint Applicants are not waiving their right to object to such interrogatory if it is resubmitted.

4. Interrogatory 25. This interrogatory need not be answered.

5. Interrogatory 26. This interrogatory need not be answered.

6. Interrogatory 27. This interrogatory is revised to read as follows: "Identify all persons, to include their qualifications, who in any way authorized, devised, derived or formulated the NUS version of the GASPARG computer model."

7. Interrogatory 29. The answer to this interrogatory will be a reference to the answer to Interrogatory 19.

8. Interrogatory 40. This interrogatory is revised to read as follows: "Identify all documents used for any calculations contained in Section 5.2 and related Appendices of your E.R.-O.L. pertaining to radiological releases."

9. Interrogatory 41. This interrogatory has been withdrawn.

10. Interrogatory 42. This interrogatory has been withdrawn.

11. Interrogatory 43. This interrogatory has been withdrawn.

12. Interrogatory 47. This interrogatory is revised to read as follows: "With respect to each pathway identified in No. 44 above, please state the time to get through the pathway and the types of radioactive nuclides expected to enter such pathways."

13. Interrogatory 56. With respect to studies which have been done by local, state or federal governmental and non-governmental entities, the answer will identify those reports of which Joint Applicants are aware.

14. Interrogatory 58. The answer to this interrogatory will provide such information as is currently known to Joint Applicants.

15. Interrogatory 61. The answer to this interrogatory will provide such information as is currently known to Joint Applicants.

16. Interrogatory 64. The answer to this interrogatory will provide such information as is currently known to Joint Applicants.

17. Interrogatory 85. The answer to this interrogatory will provide such information as is currently known to Joint Applicants.

18. Interrogatory 93. Part C of this interrogatory need not be answered.

19. Interrogatory 124. With respect to the information requested for the 91st Avenue Sewage Treatment Facility, the answer will provide such information as is currently known to Joint Applicants.

20. Interrogatory 127. With respect to that portion of the interrogatory which requests information for the 91st Avenue Sewage Treatment Facility, the answer will describe the treatment process in general terms.

21. Interrogatory 130. With respect to the on-site water reclamation facility (WRF), the answer will be sufficient if it contains a description of and process diagrams for the WRF. With respect to the 91st Avenue Facility. Joint Applicants need not identify blueprints.

22. Interrogatory 132. The answer to this interrogatory will provide such information as is received from the City of Phoenix in response to an inquiry from Joint Applicants covering the last ten years.

23. Interrogatory 135. With respect to the information requested for the 91st Avenue Facility, Joint Applicants will provide such information as is currently known to them.

24. Interrogatory 140. The answer to this interrogatory will provide such information as is currently known to Joint Applicants.

25. Interrogatory 159. The term "peak monthly demand" in this interrogatory refers to the sum of the BID contract amount and the monthly peak demand of the Plant.

26. Interrogatory 168. The answer to this interrogatory will provide the requested information for annual capacity factors of 25%, 50%, 75% and 100%, plus the annual capacity factor resulting from operation for 11 months at a 95% capacity factor and one month at a 0% capacity factor.

27. Interrogatory 187. The answer to this interrogatory will refer to the answer to Interrogatory 127.

28. Interrogatory 193. With the exception of information respecting personnel, training and supervision, the answer to this interrogatory will refer to the answer to Interrogatory 127.

29. Interrogatory 215. The answer to this interrogatory will provide such information as is currently known to Joint Applicants.

30. Interrogatory 218. This interrogatory need not be answered.

31. Interrogatory 235. The answer to this interrogatory will be limited to documents relating to pressurized water reactors.

32. Interrogatory 238. This interrogatory is revised to read as follows: "Identify each person who knows or claims to have knowledge or information establishing or tending to establish your answer to No. 237 above."

33. Interrogatory 241. This interrogatory is revised to read as follows: "Please identify all documents relating to descriptions and specifications, including cost data, on all pressurized water reactors which, during reactor construction, have installed new equipment designed to mitigate A.T.W.S."

34. Interrogatory 261. The answer to this interrogatory will refer to the answer to the second of Interrogatories Nos. 263.

35. Interrogatory 266. This interrogatory is revised to read as follows: "Assuming the base mats for Units 1 and 2 are not structurally able to support the systems and equipment inside containment, please describe the accident possibilities which would result."

36. Interrogatory 269. This interrogatory is revised to read as follows: "Please describe how the reactor coolant system rests on the base mats on Units 1 and 2."

37. Interrogatory 272. This interrogatory is revised to read as follows: "Where is the reactor cavity located in Units 1 and 2?"

38. Interrogatory 284. The answer to this interrogatory will describe test reports prepared by Engineering Testing Laboratory for the Units 1 and 2 base mats.

39. Interrogatory 326. This interrogatory is revised to read as follows: "If the answer to No. 320 above is no, are these short-term releases treated separately in dose calculations or included in averaged annual releases from which the dose calculations in Appendix 5B of E.R.-O.L. are derived?"

40. Interrogatory 332. This interrogatory is revised to read as follows: "Are any radionuclides released during normal operating conditions not subject to filtration or other contaminant-removal systems? If the answer is yes, please state from which piece of equipment such releases occur, when and under what conditions such releases occur, and in what volume (in Curies)."

41. Interrogatory 341. The response to this interrogatory will identify all documents which were used to prepare the FSAR and the ER-OL and are related, either directly or indirectly, to Intervenor's contentions.

II. Joint Applicants' First Set of Interrogatories and Requests for Production of Documents to Intervenor

1. Interrogatory 30. This interrogatory is revised to read as follows: "Is it your position that the design of PVNGS should be supplemented by the incorporation of features designed to mitigate the consequences of an ATWS event?"

2. Interrogatory 34. This interrogatory is revised to read as follows: "Is it your position that the risk of occurrence of an ATWS event at PVNGS poses a safety question that would foreclose issuing an operating license for the facility?"

3. Interrogatory 35. The answer to the second part of this interrogatory will be prepared with reference to part (b) of the issue as defined by the Atomic Safety and Licensing Board Memorandum and Order of April 16, 1981, at page 6.

4. Interrogatory 62. The answer to this interrogatory will provide whatever means of identification are known or available to Intervenor.

5. Interrogatory 63. It is Intervenor's position that individuals need not be identified in the answer to this interrogatory. It is Joint Applicants' position that individuals must be identified in the answer to this interrogatory.