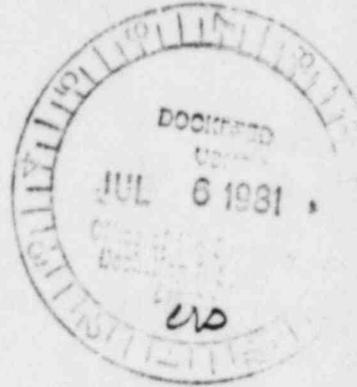


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board



In the Matter of)
)
LONG ISLAND LIGHTING COMPANY)
)
(Shoreham Nuclear Power Station,)
Unit 1))

Docket No. 50-322

SOC'S FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS
TO THE NUCLEAR REGULATORY COMMISSION STAFF

I.

The Shoreham Opponents Coalition (SOC) serves on the Nuclear Regulatory Commission Staff (NRC or Staff) the interrogatories and requests for production of documents that appear below. A sworn response to them must be provided to SOC in accordance with the terms of 10 CFR Section 2.720(h)2ii and 2.744. If the answer to any question is not known when the response is filed, the answer must be provided as soon as the missing information becomes available.

The attached series of questions include both interrogatories and requests for production of documents. They have been included in a single document to facilitate understanding of the context in which either answers to interrogatories or production of documents

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is requested. Furthermore, SOC has tried to provide, in a single document, the range of issues and facts pertaining to the NRC Staff's review of the Shoreham facility, which are of concern to SOC in Docket No. 50-322 regarding the SOC contentions presently admitted in that proceeding.

For each SOC contention interrogatories have been distinguished from requests for production of documents according to the following code:

(no asterisk) = Interrogatory
* = Request for production of documents
** = Interrogatory and Request for production of documents

With regard to SOC's requests for production of documents, each and every request pertains to a specific SOC contention which has been admitted by the Board in Docket No. 50-322. Without production by the Staff of the requested documents, as well as answers to the interrogatories, SOC will be without the necessary information to properly evaluate determinations and resolutions on technical issues made by Staff with regard to SOC's contentions. Accordingly, SOC respectfully urges the Presiding Officer and Executive Director of Operations to order answers to these interrogatories and the production of documents in accordance with 10 CFR 2.720(h)2ii and 2.744.

As used in the interrogatories and request for production of documents, the following definitions apply as indicated:

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1. "NRC," means Nuclear Regulatory Commission, its officers, staff, agents, employees, and consultants.

2. "Facts," include the calculational or other assumptions, if any, underlying various assertions of fact. "Including" and "include," as used in these interrogatories, mean "including but not limited to."

3. "Document" or "documents," mean any handwritten, typed, printed, recorded or graphic matter however produced or reproduced, including material stored for use in automatic data processing systems, whether or not in the possession, custody or control of the NRC and whether or not claimed to be privileged against discovery on any ground, including: reports; records; lists; memoranda; correspondence; telegrams; schedules; photographs, sound recordings; films; hand, machine and computer calculations; computer codes; data; and written statements of witnesses or other persons having knowledge of the facts.

4. "Studies or observations," include physical, empirical, calculational, assumptional, and other types of work, whether recorded in writing or not.

Please provide answers to the following questions which pertain to specific SOC contentions in Docket No. 50-322.

SOC CONTENTION 1

1. Has the NRC determined that the combined off-site emergency plans of the Applicant, local, and state officials are required to be in full compliance with the emergency planning measures set forth in 10 CFR 50, Appendix E and 10 CFR 50.47 which became effective on November 3, 1980, including each of the criteria set forth in NUREG-0654, Rev. 1, dated November, 1980?
- ** 2. If the answer to 1 is anything other than a simple affirmative, list each requirement of the regulations which is not applicable and, for each, provide each study, observation, or documents which the NRC relies on to support its conclusion.
3. Does the NRC contend that the combined off-site emergency plans of the Applicant, local, and state officials are now in full compliance with the emergency planning measures set forth in 10 CFR 50, Appendix E, and 10 CFR 50.47 which became effective on November 3, 1980, including each of the criteria set forth in NUREG-0654, Rev. 1, dated November, 1980?
- ** 4. If the answer to 3 is a simple affirmative, provide each study, observation, or document which the NRC relies on to support this conclusion including a list of the relevant applicant, local, and state emergency plans.
- ** 5. If the answer to 3 is anything other than a simple affirmative, list each requirement of the regulations which is not currently complied with, and for each, provide each study, observation, or documents which the NRC relies on to support this conclusion.
6. For each of the requirements listed in 5, provide a schedule which sets forth the date when the NRC believes the non-compliance will be corrected.
7. Has the NRC determined that the ten-mile (radius) EPZ for the plume exposure pathway is appropriate for Shoreham?
- * 8. If the answer to 7 is a simple affirmative, provide each site-specific and generic site study, observation, or document on which the NRC relies to support this conclusion, with regard to the following considerations:

- a. Demography
 - b. Meteorology
 - c. Topography
 - d. Land use characteristics
 - e. Local jurisdictional boundaries
 - f. Local jurisdictional boundaries
 - g. Release time characteristics
9. If the answer to 7 is anything other than a simple affirmative, provide the dimensions and a detailed description of the plume exposure pathway EPZ that the NRC believes is appropriate for Shoreham.
- * 10. For the plume exposure EPZ set forth in 9, provide each site-specific and generic site study, observation, or document which the NRC relies on to support this conclusion with regard to the following considerations:
- a. Demography
 - b. Meteorology
 - c. Topography
 - d. Land use characteristics
 - e. Access routes
 - f. Local jurisdictional boundaries
 - g. Release time characteristics
11. Does the NRC contend that the 50-mile (radius) ingestion pathway EPZ is appropriate for Shoreham?
- * 12. If the answer to 11 is a simple affirmative, provide each site-specific and generic site study, observation, or document which the NRC relies on to support this conclusion, including all of the preceding which address the following:
- a. Demography
 - b. Meteorology
 - c. Topography
 - d. Land use characteristics
 - e. Time of year of release
13. If the answer to 11 is anything other than a simple affirmative, provide the dimensions of the ingestion pathway EPZ that the NRC believes is appropriate.
- * 14. For the ingestion pathway EPZ set forth in 13, provide each site-specific or generic site study, observation, or document which the NRC relies on to support this conclusion, including all of the preceding which address the following:

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- a. Demography
- b. Meteorology
- c. Topography
- d. Land characteristics
- e. Time of year of release

15. Provide each study, observation, or document which the NRC Staff relied on to establish the generic 10 and 50-mile (radius) EPZ requirements in the current NRC regulations as set forth in Interrogatories 1 and 3 above.

SOC CONTENTION 2

1. a. Has the NRC issued regulations for emergency planning which have now superceded those previously set forth in the NRC Policy Statement of October 23, 1979, for Shoreham?
 - b. If the answer is affirmative, list all such regulations.
2. Does the NRC contend that the regulations cited in response to 1 require that emergency planning measures must be designed to mitigate the consequences of hypothetical releases to the liquid pathway as a result of core melt accidents?
- ** 3. If the answer to 2 is a simple affirmative, list each of the regulatory criteria which is applicable for the 50-mile (radius) ingestion pathway EPZ relative to liquid pathway releases, and for each, provide each study, observation, or documents which the NRC relies on to support this conclusion.
- * 4. If the answer to 2 is anything other than a simple affirmative, list each study, observation, or document which the NRC relies on to support the conclusion that emergency planning to mitigate the consequences of releases from core-melt accidents through the liquid pathway are not encompassed or required by the current NRC regulations.
5. Has the NRC determined that the combined off-site emergency plans of the Applicant, local and state authorities now address the effects of releases to the liquid pathway resulting from core-melt accidents?
- * 6. If the answer to 5 is a simple affirmative, provide each study, observation, or document which the NRC relies on to support this conclusion, including copies of the relevant sections of the Applicant, local, and state emergency plans.
- ** 7. If the answer to 5 is anything other than a simple affirmative, list each requirement of the regulations which is not currently complied with, and for each, provide each study, observation, or document which the NRC relies on to support this conclusion.
8. For each of the areas of non-compliance listed in 7, provide a schedule which sets forth the date when the NRC believes the non-compliance will be corrected.
- * 9. Provide a copy of each study, observation, or document which the NRC relies on to quantify, qualitatively or

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quantitatively, the potential consequences which might occur due to hypothetical releases through the liquid pathway resulting from a core-melt accident at Shoreham. Please include all references to time implicitly or explicitly considered in preparing this response.

10. Provide a description of each Shoreham design feature, including interdiction barriers, which the NRC relies on to determine that the potential consequences of hypothetical releases through the liquid pathway as a result of core-melt accidents can be mitigated at Shoreham.

SOC CONTENTION 3

1. Has the NRC review of Shoreham determined that the present design is in compliance with Reg. Guide 1.97, Revision 2?
 - a. If the answer is other than a simple "yes", please answer the following:
 - (1) Has the Applicant committed to comply with Reg. Guide 1.97, Rev. 2? If so, describe in detail the measures to be taken to insure compliance.
 - (2) What portion(s) of Reg. Guide 1.97, Rev. 2 are considered by the NRC not to be in compliance at the Shoreham plant?
 - (3) Set forth the schedule set by the NRC to require the Applicant to bring the plant into compliance with Reg. Guide 1.97, Rev. 2.

2. a. For each measured variable identified in Reg. Guide 1.97, revision 2, Table 3, please describe the NRC's understanding of which instrument(s) or other methods LILCO uses or intends to use to make the measurement.
 - b. Of the devices, instruments and/or methods described in 2.a., which ones have been added to satisfy the post-accident monitoring needs identified in Reg. Guide 1.97, revision 2?
 - * c. Please provide a copy of any documents or correspondence between LILCO and the NRC which describe these instruments and methods.

3. Based on the NRC's review of Shoreham, please state what instruments have been installed or are planned to be installed in Shoreham to monitor the plant status and reactor core during inadequate or degraded core cooling conditions?
 - a. Which of these, if any, were added in response to Reg. Guide 1.97, revision 2?
 - b. What other techniques, methods, instruments or procedures has LILCO proposed to use in measuring or determining the onset of inadequate core cooling?
 - c. What other techniques, methods, instruments or procedures has LILCO proposed to use to measure the core temperature during degraded core cooling conditions?

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- * d. Please provide copies of all correspondence between LILCO and the NRC which pertain to degraded core cooling conditions at Shoreham.
- 4. Based on the NRC's review of Shoreham, please state the type of instruments that have been permanently installed or are planned to be installed to continuously measure Iodine and other halogens in the Shoreham plant?
 - a. What are their monitoring ranges?
 - b. What qualification requirements have they been requested to meet?
- 5. Please answer questions 4a and b for measurement of Iodine and other halogens at the Shoreham plant release points.
- 6. Does the NRC position in the SER (page 7-13) that
"[T]he Applicant will be expected to upgrade post-accident monitoring instrumentation in accordance with Revision 2 of Regulatory Guide 1.97....",
mean that all items applicable to BWRS shall be met?
 - a. If the answer is other than a simple "yes", please define which sections are excluded and explain the reasons.
- 7. Has the NRC required that in-core thermocouples be installed on BWR's similar to Shoreham?
 - a. Has LaSalle been requested or required to install in-core thermocouples?
 - * b. If the answer to 7.a. is positive, please provide the copies of the documents which state the requirement.
 - c. Does the NRC intend to recommend or require in-core thermocouples on Shoreham?
- 8. Does the NRC plan to require the addition of in-core thermocouples at Shoreham as described in Section vii c of the proposed rule (46 FR 92, page 26498) prior to the rule being formally adopted?
 - a. If the response to the above is anything but a simple "yes", please provide detailed reasons.

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SOC CONTENTION 6(a)(i)

1. Does the NRC contend that the quality assurance and quality control program for the design, procurement, construction, and installation of structures, systems, and components important to safety at the Shoreham site is in complete compliance with each of the requirements of the eighteen criteria of Appendix B to 10 CFR 50 and of Criterion 1 of Appendix A to 10 CFR 50?
- * 2. If the answer to 1 is a simple affirmative, provide each study, observation, or document which the NRC relies on to support this general conclusion, including copies of the relevant policies and procedures.
3. If the answer to 1 is anything other than a simple affirmative, for each structure, system, and component important to safety and not in complete compliance with the regulations, provide a list of the QA criteria not met and a description of the justification, if any, for the area of non-compliance.
4. Provide a list of Applicant's contractors, agents, or consultants responsible for establishing and executing any portion of the on-site QA program.
5. For each contractor, agent, or consultant identified in 4, provide the following information:
 - a. Date a program was established.
 - b. Date when activities important to safety were initiated.
- * 6. Provide all documents developed by or for the NRC which provide a qualitative and/or quantitative measurement of the effectiveness of the Shoreham quality assurance program.
7. Provide all documents developed by or for the NRC describing the purpose, responsibilities, work scope, audit checklists, and inspection checklists for the NRC's resident inspector, the I&E inspection program, and the Vendor Inspection Program as related to the Shoreham Station. Include all reports issued by the NRC in 1979, 1980, and 1981 YTD* related to the Shoreham plant, its contractors, and major safety equipment suppliers.

*Year to date

- * 8. Provide all documents developed by or for the NRC describing the purpose, scope, plans, and 1980 and 1981 schedules for the NRC's SALP Program including any reviews of the Shoreham Station.
- * 9. Provide all documents developed by or for the NRC since November, 1975 suggesting revisions to Section 17 of the Standard Review Plan including any documents showing the ultimate resolution of the suggestion. Also include all drafts of proposed revisions to Section 17 of the Standard Review Plan and the comments received on the proposed revisions.
- * 10. Provide all documents developed by or for the NRC since 1976 which address the effectiveness of the NRC in assuring that QA programs are effectively implemented including all status and progress reports presenting the activities initiated in response to the critiques. Also include all documents which identify any improvements or reductions in the NRC QA program that since 1976 have been implemented generically or at Shoreham specifically.
- * 11. Provide all documents developed by or for the NRC which address the NRC's policies and procedures for both the generic and Shoreham specific evaluation of the QA program for non-safety related structures, systems, and components during construction and operation.
- * 12. Provide all documents developed by or for the NRC which describe the basis and conclusions for the Staff review of the Shoreham Q-list. Also include all documents which address the adequacy of the current NRC criteria for the Q-list including a description of any proposed changes since 1978 to the Q-list criteria and the resolution of any such comments which did not result in a change to the Q-list criteria.
- * 13. Provide all documents developed by or for the NRC which address the NRC interpretation of the definition of "structures,, systems, and components important to safety" as prescribed in 10 CFR 50, Appendix A, Criterion 1.
- 14. Does the NRC intend to provide or require that a documentation of deviations showing Shoreham's compliance with current regulations, practices and standards be completed:

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- a. Prior to the extension of the Shoreham construction permit?
- b. Prior to the issuance of an operating license?
- c. After the issuance of an operating license?
- d. Not at any time.
- e. If the answer to a, b or c above is affirmative, state what individuals, branches or divisions of the NRC will be responsible to ensure compliance with the documentation of deviations requirement.
- ** f. If the answer to "d" above is affirmative, state in detail the basis for that determination and provide copies of all documents upon which the NRC relies in making that determination.

SOC CONTENTION 8

1. Does the NRC agree that GDC 13 of 10 CFR 50 Appendix A requires instrumentation to monitor variables and systems that can affect the integrity of the reactor core for anticipated operational occurrences and accident conditions?
2.
 - a. Based on the NRC's review of Shoreham, state whether the Applicant's design of Shoreham includes instrumentation for measuring the integrity of the reactor fuel and the reactor core as required in GDC 13?
 - b. If the answer to 2.a. is negative, state whether the NRC will require such instrumentation and if not, state in detail why such instrumentation will not be required.
 - c. If the answer to 2.a. is affirmative, please answer the following:
 - (1) Describe in detail which instruments are supplied and how the instruments or systems are used to meet the requirements of GDC 13.
 - (2) Is the Applicant's technique for monitoring the integrity of the reactor fuel a direct measurement?
 - (3) Is the Applicant's technique for monitoring the integrity of the reactor core a direct measurement?
 - (4) If the Applicant's technique for monitoring the integrity of the reactor core or reactor fuel is an indirect measurement, describe that technique in detail and explain the basis for the NRC's conclusion that such technique is adequate to meet the criteria and standards of GDC 13.
3. Does the NRC plan to require installation of incore thermocouples at Shoreham?
 - a. If the answer is anything but a simple "yes", please answer the following:
 - (1) Is there a direct method of measuring reactor fuel integrity and reactor core integrity that LILCO is planning to use and, if so, please describe it in detail.
 - (2) What instruments or systems are available in the Shoreham design to measure the onset of degraded core cooling which could impact the integrity of the fuel?

- (3) What instruments or systems are available in the Shoreham design for measuring the extent of damages to the fuel during or following degraded core cooling conditions?
 - (4) Does the NRC consider the techniques identified in a(1)-(3) above adequate to meet GDC 13?
 - (5) Have the NRC and LILCO discussed the possibility of installing incore thermocouples at Shoreham?
 - * (6) If the answer to 3(a)(5) is affirmative, please provide copies of all documents and correspondence between NRC and LILCO which relate to installing incore thermocouples at Shoreham.
4. Has the Applicant documented a position with the NRC, either directly or through participation in one of the BWR owners' groups or the Licensing Review Group, on the requirement that incore thermocouples be installed in the LaSalle BWR in Illinois?
 - a. If the answer to interrogatory 4 is affirmative, what is that position?
 - * (1) Please provide a copy of the documents where that position is described.
 - (2) Has the NRC accepted the above position(s)?
 5. Does the NRC believe that it is possible for the loss of integrity of the reactor core and fuel damage of the type experienced at TMI to occur at Shoreham?
 - a. If the answer is yes, explain in detail how such an occurrence could happen at Shoreham.
 - ** b. If the answer is no, explain in detail the basis of that conclusion and provide copies of any documents upon which the NRC relies to support that conclusion.

SOC CONTENTION 9

1. Based on the NRC's review of Shoreham, does the Shoreham design as now implemented meet Reg. Guide 1.47 in every detail?
 - a. If the answer to 1 is other than a simple "yes", state each and every aspect of the Shoreham design which is not in compliance with Reg. Guide 1.47 and the justification for each such non-compliance.
2. Does the NRC agree that Reg. Guide 1.47 applies to the safety systems on the Shoreham plant?
 - a. If the answer is negative, identify each Shoreham safety system for which the NRC believes Reg. Guide 1.47 does not apply and state in detail the basis for that conclusion for each such system.
3. Does the NRC agree that indications of a bypassed or disabled condition is important to safe operation of the Shoreham plant for systems which are:
 - a. Reactor scram system?
 - b. Required for safety?
 - c. Safety-related?
 - d. Required for safe shut-down?
4. For each answer to 3.a, b, c, and d which is other than a simple "yes", please explain the reasoning which justifies the NRC's position.
5. Has the NRC received a documented position from LILCO on Reg. Guide 1.47 compliance (other than the FSAR Section 7)?
 - ** a. If the answer is affirmative, identify the position(s) and provide a copy of each document.
6. Has the NRC made a review or requested LILCO to make a review of Shoreham systems and components to determine which are important to safety?
 - * a. If the answer is in the affirmative, please provide a copy of each review document or request for review and all related correspondence.

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- b. If the answer is in the negative, does the NRC plan to require or prepare a review or study of Shoreham systems or components to determine which are important to safety?
7. Has the accident at TMI-2 in any way changed the safety classification of instrumentation, control, systems, and components at Shoreham?
- a. If the answer is in the affirmative, please state the systems and/or components involved, the change in classification and the reasons for the change.
 - b. If the answer is in the negative, explain in detail the basis to support the determination that no such change of classification is needed or required at Shoreham and provide copies of any documents upon which the NRC relies to support that determination.
 - c. If no change in safety classification has been made as of this date, does the NRC intend to make any such change in safety classification, and if so, when?
- **

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SOC CONTENTION 12 (PART TWO) (MARK II)

1. Provide the names of NRC personnel and the details of their assigned responsibilities for all such individuals assigned to review the adequacy of the Shoreham containment system.
- ** 2. Have any NRC personnel involved with the Shoreham containment review expressed concern, verbally or in writing, regarding the adequacy of the system design? If so, provide the names of the NRC personnel and provide a full description of any such concern identified, including details of its disposition, and copies of all related correspondence and documents.
- * 3. Provide copies of any and all NRC Staff position papers and NRC Commissioners' briefing documents prepared on the Shoreham containment and/or Mark II generic program definition program implementation.
4. Provide a listing of all meetings held between the NRC Staff and LILCO at which the Shoreham containment was discussed. Indicate topics of discussion for each meeting.
5. Provide a listing of all reports, including full identification of each, in which Mark II and Shoreham containment programs are discussed. Identify specifically those reports on which the NRC relies in evaluating the down-comer loads and design adequacy and explain the basis for such reliance.

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SOC CONTENTION 12 (PART THREE) (H2 GENERATION)

1. What schedule does the NRC anticipate for completion of the degraded core rulemaking? Is it contemplated at this time that the changes to equipment and procedures, if any, that result from the proceedings, will be made applicable to existing (operating) facilities as well as to future plants?
2. Does the NRC concede that hydrogen generation associated with a degraded core accident can exceed the quantities specified in 10 CFR 50.44?
- ** 3. If the answer to question 2. above is other than a simple affirmative, provide a complete discussion of the basis of that position and provide copies of all documents upon which the NRC relies in support of that conclusion. In particular, provide a technical explanation of the basis for that conclusion.
- * 4. Provide copies of all Staff position papers and Commission briefing papers prepared for use in internal policy decision making on the subject of hydrogen generation as described in question 2. above.
- * 5. Provide copies of all documents and/or studies referenced or relied upon as a foundation for the documents identified in question 4. above.
- ** 6. Provide a list of all NRC personnel or consultants who have contended that the NRC has not adequately responded to regulatory requirements for the control or mitigation of excessive hydrogen generation resulting from degraded core accidents. Provide copies of all documents relating to the disposition and/or resolution of such concerns.
- * 7. Provide copies of all independent studies performed, if any, by the NRC or its agents to attempt to determine the maximum quantity of hydrogen-oxygen rapid recombination which could theoretically be contained by the Shoreham containment, or in containments of the Mark II design.

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SOC CONTENTION 15 (CONTROL BLADE LIFE)

1. a. Is it the NRC's position that Bulletin 79-26 is applicable to the Shoreham plant?
 - b. If not, will it be applicable to Shoreham in the future?
 - ** c. If so, when? If it will not be applicable,, explain the basis for the conclusion and provide copies of any documents on which the NRC relies on in support of that conclusion?
2. a. Does the NRC believe that the control blades planned for use at Shoreham are of a similar design to those experiencing failures as reported in Bulletin 79-26?
 - b. Are the technical and operational concerns expressed in 79-26 fully applicable to Shoreham?
 - c. If not, explain in detail why not.
- ** 3. If the answer to either question contained in 2 is no, provide the full explanation of the basis of the NRC's position and copies of all documents which support that conclusion.
4. a. Has the NRC evaluated the capabilities of the coolant chemistry systems and procedures to be used at Shoreham?
 - b. What is the minimum boron leach-rate that NRC believes can be detected?
 - c. Please relate this rate to numbers of cracked boron tubes in control blades.
5. a. Has the NRC independently evaluated the sensitivity of rod-worth tests as presently practiced at operating BWR's for detecting the diminished neutron-absorption capabilities of control blades?
 - b. Does the NRC have reason to believe that LILCO intends to perform rod-worth tests in a substantially different way?
 - ** c. If so, provide the details and the NRC's evaluation of such tests and copies of all documents which pertain to those tests and evaluations.

SOC CONTENTION 16

1. Based on the NRC's review of Shoreham, does the Shoreham design, analysis and documentation presently comply with the requirements of 10 CFR 50 Appendix K, Section I?
 - a. If the answer is anything but a simple "yes", please describe each area where it does not comply or where compliance is in doubt.
 - (1) For each example of doubtful or non-compliance, if any, please state the NRC's intended action to correct the condition and the date of that correction.
 - * (2) For each example of doubtful or non-compliance, please provide a copy of each and every piece of correspondence between NRC and LILCO on that issue.
 - (3) For each example of doubtful or non-compliance where no NRC corrective action is contemplated, explain the basis for that determination.
2. Based on the NRC's review of Shoreham, what analytical models were used by LILCO or its suppliers in analyzing fuel swelling and flow blockage in the core as a result of LOCA conditions?
 - a. For each model, describe how it differed from the models used in NUREG-0630 for similar analysis.
 - b. For each model used in the Shoreham analysis state whether it is conservative or non-conservative in comparison with NUREG-0630 and define the reasons for your statements.
3. Does the NRC agree that the comparison of BWR models to the more detailed models as shown in NUREG-0630 tend to underpredict the degree of swelling for some high stress conditions?
 - a. If the response to 3 is other than a simple "yes", please state the reasons for your response.
4. Does the NRC believe the straight line approximation used in the GE model (as shown in NUREG-0630) is adequate to meet the requirements of 10 CFR 50 Appendix K?

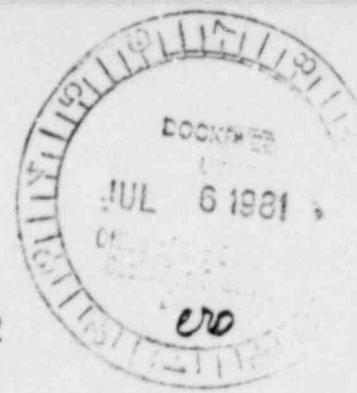
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- a. If the response is anything but a simple "no", please state the justification for the response.
- b. If the response is in the negative, please state the nature and time schedule for additional corrections and analyses.

SOC CONTENTION 17

1. Based on the NRC's review of Shoreham, does the Shoreham design comply with the requirements of 10 CFR 50.55 a(h) with regard to:
 - a. Reactor scram system?
 - b. Emergency core cooling systems and components?
 - c. Standby liquid control system?
 - d. All systems required for safety?
 - e. All systems safety-related?
 - f. All systems required for safe shutdown?
2. For each answer to interrogatory 1 which is not a simple "yes", please give the name of each system and why it does not comply.
3. Does the NRC believe that 10 CFR 50.55 a(h) is applicable to each of the categories of systems identified in interrogatory 1 a through f?
 - a. If not, state the reasons why?
4. Has the NRC reviewed the Shoreham design to decide what safety systems are required to go to completion once initiated?
 - a. If the answer is affirmative, please provide a copy of the review or study.
*
 - b. If the answer is negative,, is such a review required, and state when it will be initiated and completed. If no review by NRC is contemplated, state in detail the reason for that determination and provide copies of any documents relied on by the NRC to support that determination.
**
5. Has the NRC requested or conducted a study or review of the effects of operator intervention with the operation of safety systems on the Shoreham plant during accident condition?
 - a. If the answer is affirmative, please provide a copy of the review document(s).
*

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
LONG ISLAND LIGHTING COMPANY)
(Shoreham Nuclear Power Station,)
Unit 1))

Docket No. 50-322

CERTIFICATE OF SERVICE

I hereby certify that copies of "SOC's First Set of Interrogatories and Requests for Production of Documents to the Nuclear Regulatory Commission Staff" dated July 1, 1981, and submitted by the Shoreham Opponents Coalition, in the above captioned proceeding, have been served on the following, by deposit in the United States mail, first class, this 2nd day of July, 1981:

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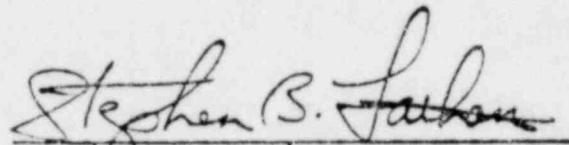
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