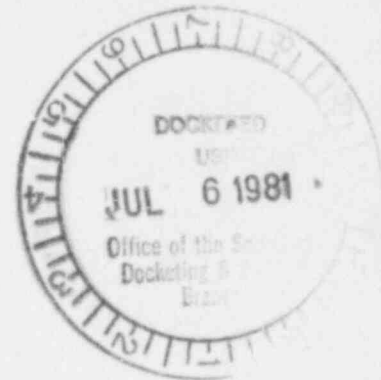


DATED: July 2 , 1981.



RELATED CORRESPONDENCE



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF)	
)	
GENERAL ELECTRIC COMPANY)	Docket No. 70-1308
)	(Renewal of SNM-1265)
(GE Morris Operation Spent)	
Fuel Storage Facility)	

ANSWERS TO GENERAL ELECTRIC
COMPANY'S SECOND SET OF
INTERROGATORIES

1. For each witness whom you will or may call as an expert to give opinion testimony in the hearing of this matter regarding any proposed Additional Contention, state the following:

- a. Name and address;
- b. Name and address of his employer or the organization with which he is associated in any professional capacity;
- c. The field in which he is to be offered as an expert;
- d. A summary of his qualifications to testify regarding the specific proposed Additional Contention or Contentions about which he is expected to testify;

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- e. The substance of the facts to which he is expected to testify;
- f. The substance of the opinions to which he is expected to testify and a summary of the grounds for each opinion; and
- g. State the dates and addresses of all reports rendered by such experts.

Response:

Illinois does not plan to call any witnesses as to Contentions 4(e), 9, or 10.

As to Contention 8:

(a) - (d):

Gregory C. Minor. See response to General Electric Company's first set of interrogatories, No. 2 and resumes submitted August 25, 1980.

(e) He is expected to testify to what he observed as to location and access to the control room at the Morris facility during inspections and to his review of the CSAR.

(f) There is not enough data in the CSAR to ensure the control room will remain habitable in the event of an accident or large release of radioactive material; nor is there sufficient data to conclude that the access routes will remain at low enough exposure rates and contamination levels to permit personnel access during and following an accident.

The control room at the Morris Operation is located at the 65' level, beneath the unused computer room and immediately adjacent to the filter room. Ventilation air is drawn from the outside at elevation 85'. One access route is through the basin area, another route is through stairwells to the Crane Maintenance and Equipment area.

The filters in the filter room could become contaminated in the event of a release or accident. The air intake could draw in radioactively contaminated air in the event of a release or accident, and the access route through the pool or basin area could be inaccessible in an accident condition. Other access routes are not discernible in the data supplied with the CSAR.

2. For each person retained or specifically employed as an expert with regard to any proposed Additional Contention, about whom no decision has been made as to whether such expert will be called to testify, state the following:

- a. Name and address;
- b. His particular field of expertise;
- c. A summary of his qualifications as an expert regarding the specific proposed Additional Contention or Contentions concerning which he has been retained or specifically employed; and
- d. Whether such an expert has submitted or transmitted any reports analyses, or opinions in any form. If so,

state the dates and addresses of all reports, analyses or opinions.

Response:

None.

3. For each Additional Contention proposed by Illinois and admitted by the Board, state with particularity the factual basis for each such contention, including all facts and technical information or data relied upon in formulating such contention.

Response:

(a) Contention 4(e): This is based on the fact that on its face the CSAR does not consider cost of complete removal of all radioactive materials nor of complete restoration of the site for unrestricted use.

(b) Contention 8: See answer to Interrogatory 1(f), supra.

(c) Contention 9: This is based on the fact that General Electric Company's operator training and certification program on its face establishes no minimum academic requirements nor any standards for passage or failure of tests.

(d) Contention 10: This is based on the fact that General Electric Company's Technical Specifications neither precludes receipt, handling or storage of damaged spent fuel nor

addresses how damaged spent fuel would be received, handled or stored in accordance with 10 C.F.R. Part 72.

4. With regard to proposed Additional Contention 1, state the regulatory basis for the allegation that General Electric's projected costs should take into account the costs of complete removal of all radioactive materials and the costs of complete restoration of the facility to unrestricted use.

Response:

10 C.F.R. §§ 72.14(e)(3) and 72.18.

5. With regard to proposed Additional Contention 1, state with particularity the basis for the allegation that the CSAR does not provide necessary financial arrangements to provide reasonable assurance that decontamination and decommissioning will be carried out.

Response:

Nowhere in the CSAR does General Electric Company address the decommissioning costs of complete removal of all radioactive materials nor of complete restoration of the facility to unrestricted use.

6. With regard to proposed Additional Contention 2, state with particularity the basis for the assumption that "transportation, receipt, handling or storage of spent fuel which has been

damaged at another facility" is a "significant external man-induced event [as used in 10 C.F.R., Part 72] affecting the [Morris] facility's design."

Response:

Deleted by General Electric Company.

7. With regard to proposed Additional Contention 3, state the regulatory basis for the allegation that access to and from the control room is required during off-normal or accident conditions.

Response:

10 C.F.R. § 72.72(j).

8. With regard to proposed Additional Contention 3, state with particularity the postulated circumstances under which there could be a release of radiation in excess of the dose limitations established by 10 C.F.R., Part 20, and state the specific dose limitations that would be exceeded.

Response:

See answer to Interrogatory 1(f), supra.

9. With regard to proposed Contention 4, state the regulatory basis for the alleged requirement that General Electric's operation training and certification program must contain:

- a. A minimum academic standard; or
- b. A numerical standard for passage or failure of testing and verification requirements.

Response:

10 C.F.R. Part 72, Subpart I.

10. With regard to proposed Additional Contention 4, state with particularity and in factual detail the basis for the allegation that the criteria established for testing and verification, as contained in General Electric's operator training and certification program, are inadequate.

Response:

It is inadequate in that it does not provide minimum academic standards nor any standard for passage or failure of test requirements.

11. With regard to proposed Additional Contention 5, state the regulatory basis for the assumption that an ISFSI cannot receive, handle or store damaged spent fuel.

Response:

The contention is not based on an assumption that an ISFSI cannot receive, handle or store damaged spent fuel.

12. With regard to proposed Contention 5, state with particularity and deficiency, of which Illinois is aware, in General Electric's provisions for receipt of spent fuel.

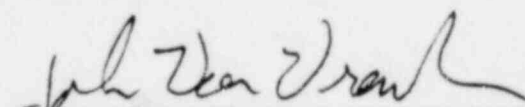
Response:

Illinois objects to this interrogatory as being beyond the scope of discovery in that Contention 10 is not directed

toward General Electric Company's receipt of undamaged spent
fuel. As to damaged spent fuel General Electric Company has not
identified or described any provisions for such receipt.

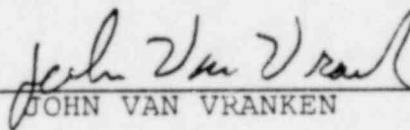
Respectfully Submitted,

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State of Illinois

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PROOF OF SERVICE

I hereby certify that on this 2nd day of July, 1981, I served copies of the foregoing Answers to General Electric Company's Second Set of Interrogatories, upon each of the persons named on the attached Service List, by causing copies to be deposited in the U.S. Mail, in envelopes properly addressed and sealed, first class postage prepaid.



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