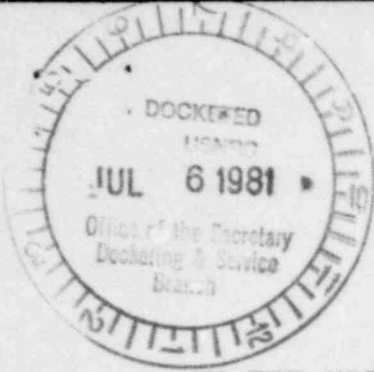
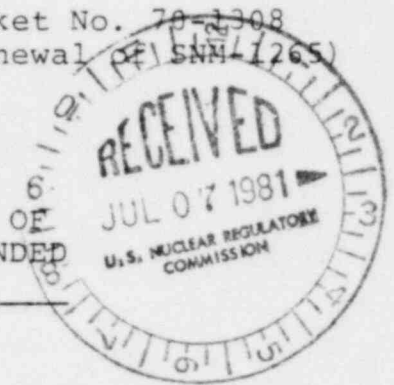


RELATED CORRESPONDENCE



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

| | | |
|---------------------------------|---|---------------------|
| IN THE MATTER OF |) | |
| |) | |
| GENERAL ELECTRIC COMPANY |) | Docket No. 79-1308 |
| |) | (Renewal #15847265) |
| (GE Morris Operation Spent Fuel |) | |
| Storage Facility) |) | |



RESPONSE TO SECOND SET OF
INTERROGATORIES PROPOUNDED
BY NRC STAFF

Interrogatory G-1.

State whether or not you intend to call any person or persons as witnesses in this proceeding in support of

- | | |
|------------------|------------------|
| (a) Contention A | (c) Contention C |
| (b) Contention B | (c) Contention D |

and provide the names, addresses, educational backgrounds and professional qualifications of those persons you intend to call.

Response

- (a) Contention 4(e): No.
- (b) Deleted.
- (c) Contention 8: Gregory C. Minor. See resume submitted August 25, 1980.
- (d) Contention 9: No.
- (e) Contention 10: No.

Interrogatory G-2.

Indicate which of those persons identified in response to Interrogatory G-1 will appear voluntarily and which persons you intend to subpoena.

*DS03
5/11
Add: 2012 Tyson-104
Delete: [Signature]*

Response:

Mr. Minor will appear voluntarily.

Interrogatory G-3.

Provide summaries of the views, positions, or proposed testimony on

- | | |
|------------------|------------------|
| (a) Contention A | (c) Contention C |
| (b) Contention B | (d) Contention D |

of all persons named in response to Interrogatory G-1 that you intend to present during this proceeding.

Response:

- (a) Contention 4(e): not applicable.
- (b) Deleted.

(c) Contention 8: 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.

(d) Contention 9: Not applicable.

(e) Contention 10: Not applicable.

Interrogatory G-4:

Identify by author, title, date of publication and publisher, all books, documents and papers that you intend to employ or rely upon in presenting your direct case on

(a) Contention A

(c) Contention C

(b) Contention B

(d) Contention D

and provide copies of, or make available for Staff inspection and copying, those items.

Response:

(a) Contention 4(e): None other than those identified in the Contention.

(b) Deleted.

(c) Contention 8: None other than those identified in the Contention.

(d) Contention 9: None other than those identified in the Contention.

(e) Contention 10: None other than those identified in the Contention.

Interrogatory G-5:

If the representations made in

- | | |
|------------------|------------------|
| (a) Contention A | (c) Contention C |
| (b) Contention B | (d) Contention D |

are based in whole or in part on any documents prepared by the Licensee or NRC Staff which you contend are deficient, identify the documents and specify the particular portions thereof you regard as deficient and explain why they are deficient.

Response:

(a) Contention 4(e): CSAR, Sec. A.7.5.3 and 9.6. It is deficient as stated in the Contention.

(b) Deleted.

(c) Contention 8: CSAR Sec. 5.5.5.4. It is deficient as stated in the Contention and in response to G-3.

(d) Contention 9: CSAR Sec. 9.3. It is deficient as stated in the Contention.

(e) Contention 10: As stated in the Contention.

Interrogatory G-6:

Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with

- | | |
|------------------|------------------|
| (a) Contention A | (c) Contention C |
| (b) Contention B | (d) Contention D |

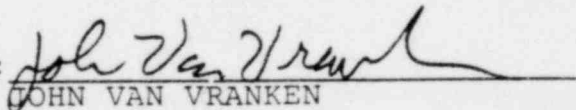
Response:

- (a) Contention 4(e): None.
- (b) Deleted.
- (c) Contention 8: None.
- (d) Contention 9: None.
- (e) Contention 10: None.

Respectfully submitted,

TYRONE C. FAHNER
Attorney General
State of Illinois

BY:


JOHN VAN VRANKEN
Assistant Attorney General
Environmental Control Division
188 W. Randolph Street - Suite 2315
Chicago, Illinois 60601
(312) 793-2491

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter Of)
GENERAL ELECTRIC COMPANY)
(GE Morris Operation Spent)
Fuel Storage Facility))

Docket No. 70-1308
(Spent Fuel Pool)

AFFIDAVIT OF

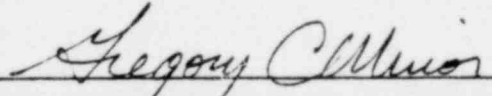
GREGORY C. MINOR

STATE OF CALIFORNIA)
COUNTY OF SANTA CLARA) ss.

GREGORY C. MINOR deposes and says under oath as follows:

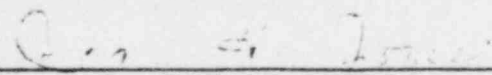
I, the undersigned, have assisted in preparing and reviewing responses to interrogatories on Morris Operation Contentions.

To the best of my knowledge, the responses are true and correct.



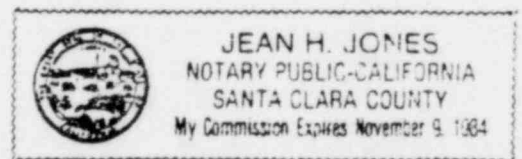
GREGORY C. MINOR

Subscribed and sworn to before
me this 29th day of May, 1981.



NOTARY PUBLIC

My Commission Expires: 11-9-84



PROOF OF SERVICE

I hereby certify that on this 2nd day of July, 1981, I served copies of the foregoing Response to Second Set of Interrogatories Propounded by NRC Staff, 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.


JOHN VAN VRANKEN

SERVICE LIST

Andrew C. Goodhope, Esq.
Chairman
3326 Estelle Terrace
Wheaton, MD 20906

Dr. Linda W. Little
5000 Hermitage Drive
Raleigh, NC 27612

Dr. Forrest J, Remick
305 E. Hamilton Avenue
State College, PA 16801

Bridget Little Rorem
Essex, Illinois 60935

Edward Firestone, Esq.
Legal Operation
General Electric Company
175 Curtner Ave., Mail Code 822
San Jose California 95125

Atomic Safety & Licensing Board
Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety & Licensing Appeal Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Marjorie Ulman Rothschild
Office of the Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Everett Jay Quigley
R.R. 1 Box 378
Kankakee, Illinois 60901

Mrs. Elaine Walsh (Patrick)
33 Pheasant Trail
Wilmington, Illinois 60481

Ronald Szwajkowski, Esq.
Mayer, Brown & Platt
231 South LaSalle Street
Chicago, Illinois 60604