

June 10, 1981

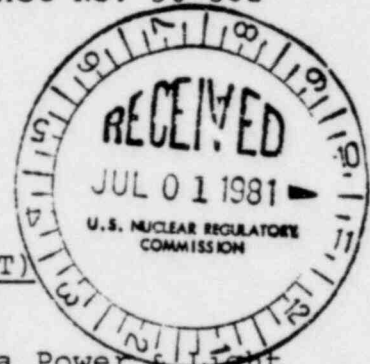
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



Before the Atomic Safety and Licensing Board

In the Matter of)
)
LOUISIANA POWER & LIGHT COMPANY)
)
(Waterford Steam Electric)
Station, Unit 3))

Docket No. 50-382



APPLICANT'S INTERROGATORIES
TO JOINT INTERVENORS (SECOND SET)

Pursuant to 10 C.F.R. § 2.740b, Louisiana Power & Light Company ("Applicant") submits the following interrogatories to be answered separately and fully in writing under oath or affirmation by Save Our Wetlands, Inc. and Oystershell Alliance, Inc. ("Joint Intervenors"). In accordance with paragraph 3 of the September 25, 1979 Discovery Stipulation, these interrogatories relate to new information in the NRC Staff's Draft Environmental Statement ("DES") bearing on allowed contentions. Pursuant to paragraph 5 of the Discovery Stipulation, these interrogatories must be answered within 30 days, and any objections to the interrogatories must be made within 15 days. Answers and objections must be served on all parties and the Licensing Board.

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INTERROGATORIES ON CONTENTION 1

1-1. State whether Joint Intervenors contend that the peak load responsibility forecasts for 1983-1986 for Applicant and the MSU System set forth in DES Table 2.1 are "higher than reasonable," as alleged in Joint Intervenors' Contention 1(a).

1-2. If the answer to the preceding interrogatory is affirmative, describe in detail all the facts that support Joint Intervenors' contention that the load forecasts are unreasonably high.

1-3. If the answer to Interrogatory No. 1-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that the load forecasts are unreasonably high.

1-4. If the answer to Interrogatory No. 1-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the reasonableness of the load forecasts and for each person state his or her address, employer, position and qualifications.

1-5. If the answer to Interrogatory No. 1-1 is affirmative, state in detail:

(a) The peak load responsibility that Joint Intervenors contend Applicant and the MSU System will encounter for the years 1983-1986;

(b) The method by which Joint Intervenors calculated their estimates of peak load responsibility;

(c) The author, title and date of each document upon which Joint Intervenors relied in making their peak load responsibility estimates; and

(d) The name, address, employer, position and qualifications of each person who assisted or contributed in making Joint Intervenors' peak load responsibility estimates.

1-6. State whether Joint Intervenors contend that the DES is incorrect in stating (§ 2.4.1) that "adequate supplies of oil for generating electricity are uncertain."

1-7. If the answer to the preceding interrogatory is affirmative, state the name and address of each oil supplier who will make a firm and certain commitment to meet Applicant's fuel oil requirements for the period 1983-1986, and state the price per barrel at which each such supplier will sell the oil during that period.

1-8. State whether Joint Intervenors contend that the DES is incorrect in stating (§ 2.4.1) that "[n]atural gas, as supplied under firm contracts, has been curtailed in the past" and that "such gas supplies may be further curtailed and that acceptable replacement fuels will be difficult to acquire."

1-9. If the answer to the preceding interrogatory is affirmative, state the name and address of each gas supplier who will guarantee to supply Applicant's natural gas requirements without curtailment for the period 1983-1986, and state the price per mcf at which each such supplier will supply the natural gas during that period.

1-10. The DES states (§ 3.2) that "the only alternative available at the operating license stage is limited to denying the operation of the facility and thereby not permitting the constructed nuclear facility to be added to the applicant's generating system." State whether Joint Intervenors contend that this statement is incorrect.

1-11: If the answer to the preceding interrogatory is affirmative, state in detail with respect to each alternative to operation of Waterford 3:

- (a) The nature of the alternative;
- (b) All the facts that support Joint Intervenors' contention that the alternative is reasonable;
- (c) The environmental and economic costs of the alternative, and the method by which such costs were calculated;
- (d) The author, title and date of all documents upon which Joint Intervenors rely in proposing the alternative; and

(e) The name, address, employer, position and qualifications of each person expected to testify on behalf of Joint Intervenors with respect to the alternative.

1-12. The DES states (§ 3.2) that "[t]he alternative of not operating the facility will involve incurring the environmental and economic costs of construction of Waterford 3 without receiving the benefit of the power Waterford 3 would produce." State whether Joint Intervenors contend that it would be reasonable to incur these economic and environmental costs without obtaining any counterbalancing benefit.

1-13. If the answer to the preceding interrogatory is affirmative, describe in detail the rationale for Joint Intervenors' contention.

1-14. State separately for each answer to the preceding interrogatories on Contention 1 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer was based.

INTERROGATORIES ON CONTENTION 2

2-1. The DES estimates (§§ 2.2, 5.10) the cost of safely decommissioning Waterford 3 to range from \$21 million to \$43 million (1978 dollars), based in part on NUREG-0586. State whether Joint Intervenors contend that this estimate is materially inaccurate.

2-2. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the estimate is inaccurate.

2-3. If the answer to Interrogatory No. 2-1 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the estimate is inaccurate.

2-4. If the answer to Interrogatory No. 2-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the estimate.

2-5. If the answer to Interrogatory No. 2-1 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the cost, (in 1978 dollars) of decommissioning Waterford 3;

(b) The method by which Joint Intervenors calculated their estimate of decommissioning costs;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of decommissioning costs; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of decommissioning costs.

2-6. The DES assumes (§ 2.2) that Waterford 3 will operate at a capacity factor of 60 percent in its first year of operation. State whether Joint Intervenors contend that this assumption is inaccurate.

2-7. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the assumption is inaccurate.

2-8. If the answer to Interrogatory No. 2-6 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the assumption is inaccurate.

2-9. If the answer to Interrogatory No. 2-6 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the assumption.

2-10. If the answer to Interrogatory No. 2-6 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the capacity factor of Waterford 3 in its first year of operation;

(b) The method by which Joint Intervenors calculated their estimate of the capacity factor;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the capacity factor; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the capacity factor.

2-11. The DES estimates (Table 6.2) that in the first year of operation the cost of fuel and the costs of operating and maintenance

for Waterford 3 will be 14.23 mills/kWh. State whether Joint Intervenors contend that this cost estimate is materially inaccurate.

2-12. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the estimate is inaccurate.

2-13. If the answer to Interrogatory No. 2-11 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the cost estimate is inaccurate.

2-14. If the answer to Interrogatory No. 2-11 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the cost estimate.

2-15. If the answer to Interrogatory No. 2-11 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the first year's fuel, operating and maintenance costs for Waterford 3;

(b) The method by which Joint Intervenors calculated their estimate of fuel, operating and maintenance costs;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of fuel, operating and maintenance costs; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of fuel, operating and maintenance costs.

2-16. The DES states (§ 2.2) that its fuel cost estimate is based in part upon Table 11 of NUREG-0480. State whether Joint Intervenors contend that the estimates of spent fuel storage, transportation and disposal costs in Table 11 are materially inaccurate.

2-17. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the estimate is inaccurate.

2-18. If the answer to Interrogatory No. 2-16 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the spent fuel cost estimates are inaccurate.

2-19. If the answer to Interrogatory No. 2-16 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the spent fuel cost estimates.

2-20. If the answer to Interrogatory No. 2-16 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the spent fuel costs for Waterford 3;

(b) The method by which Joint Intervenors calculated their estimate of spent fuel costs;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of spent fuel costs; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of spent fuel costs.

2-21. The DES estimates (§§ 2.2, 6.6.2) that the fuel-cost savings during the first year of operation of Waterford 3 will be approximately \$230 million. State whether Joint Intervenors contend that this estimate is materially inaccurate.

2-22. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the estimate is inaccurate.

2-23. If the answer to Interrogatory No. 2-21 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the estimate is inaccurate.

2-24. If the answer to Interrogatory No. 2-21 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the estimate.

2-25. If the answer to Interrogatory No. 2-21 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the first year's fuel-cost savings;

(b) The method by which Joint Intervenors calculated their estimate of the first year's fuel-cost savings;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the first year's fuel-cost savings; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the first year's fuel-cost savings.

2-26. State separately for each answer to the preceding interrogatories on Contention 2 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer was based.

INTERROGATORIES ON CONTENTION 8/9

8/9-1. The DES states (§ 5.9.1.5.1(1)) that the "occupational risk associated with the industrywide average radiation dose is about 11 potential premature deaths/10⁵ man-years attributable to cancer." State whether Joint Intervenors contend that this statement is materially inaccurate.

8/9-2. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the occupational risk estimate is inaccurate.

8/9-3. If the answer to Interrogatory No. 8/9-1 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the occupational risk estimate is inaccurate.

8/9-4. If the answer to Interrogatory No. 8/9-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the occupational risk estimate.

8/9-5. If the answer to Interrogatory No. 8/9-1 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the occupational risk;

(b) The method by which Joint Intervenors calculated their estimate of the occupational risk;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the occupational risk; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the occupational risk.

8/9-6. The DES estimates (§ 5.9.1.5.2(3)) that the risk of potential premature death from cancer to the maximally exposed individual from exposure to radioactive effluents from one year of normal reactor operation at Waterford 3 "is less than one chance in a million . . . over the average lifetime." State whether Joint Intervenors contend that this estimate is materially inaccurate.

8/9-7. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the risk estimate is inaccurate.

8/9-8. If the answer to Interrogatory No. 8/9-6 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the risk estimate is inaccurate.

8/9-9. If the answer to Interrogatory No. 8/9-6 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the risk estimate.

8/9-10. If the answer to Interrogatory No. 8/9-6 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the risk to the maximally exposed individual;

(b) The method by which Joint Intervenors calculated their estimate of the risk to the maximally exposed individual;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the risk to the maximally exposed individual; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the risk to the maximally exposed individual.

8/9-11. The DES estimates (§ 5.9.1.5.2(3)) that the risk of potential premature death from cancer to the average individual within 50 miles of Waterford 3 from exposure to radioactive effluents from normal operation of the reactor "is less than 1 percent of the risk to the maximally exposed individual." State whether Joint Intervenors contend that this estimate is materially inaccurate.

8/9-12. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the risk estimate is inaccurate.

8/9-13. If the answer to Interrogatory No. 8/9-11 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the risk estimate is inaccurate.

8/9-14. If the answer to Interrogatory No. 8/9-11 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the risk estimate.

8/9-15. If the answer to Interrogatory No. 8/9-11 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the risk to the average individual within 50 miles of Waterford 3;

(b) The method by which Joint Intervenors calculated their estimate of the risk to the average individual within 50 miles of Waterford 3;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the risk to the average individual within 50 miles of Waterford 3; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the risk to the average individual within 50 miles of Waterford 3.

8/9-16. The DES estimates (§ 5.9.1.5.2(4)) that the risks to the general United States population from exposure to radioactive effluents and transportation of fuel and waste from each year of normal operation of Waterford 3 "are a very small fraction (less than 0.001 percent) of the risks to the U.S. population from each year of exposure to natural background radiation." State whether Joint Intervenors contend that this estimate is materially inaccurate.

8/9-17. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the risk estimate is inaccurate.

8/9-18. If the answer to Interrogatory No. 8/9-16 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the risk estimate is inaccurate.

8/9-19. If the answer to Interrogatory No. 8/9-16 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the risk estimate.

8/9-20. If the answer to Interrogatory No. 8/9-16 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the risk to the general population;

(b) The method by which Joint Intervenors calculated their estimate of the risk to the general population;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the risk to the general population; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the risk to the general population.

8/9-21. State separately for each answer to the preceding interrogatories on Contention 8/9 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer was based.

DATED: June 10, 1981.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE
1800 M Street, N.W.
Washington, D.C. 20036
(202) 822-1000

BY: 

Bruce W. Churchill
James B. Hamlin

Counsel for Applicant

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of Applicant's Interrogatories To Joint Intervenors (Second Set), dated June 10, 1981, were served upon those persons on the attached Service List, by deposit in the United States mail, postage prepaid, this 10th day of June, 1981.



Bruce W. Churchill

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SERVICE LIST

Sheldon J. Wolfe, Esquire
Chairman, Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Harry Foreman
Director, Center for
Population Studies
Box 395, Mayo
University of Minnesota
Minneapolis, Minnesota 55455

Dr. Walter H. Jordan
881 West Outer Drive
Oak Ridge, Tennessee 37830

Joseph R. Gray, Esquire
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Docketing and Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Lyman L. Jones, Jr., Esquire
Gillespie & Jones
Suite 201
1420 Veterans Memorial Boulevard
Metairie, Louisiana 70005

Stephen M. Irving, Esquire
Louisiana Consumers League, Inc.
535 No. 6th Street
Baton Rouge, Louisiana 70802

Luke B. Fontana
824 Esplanade Avenue
New Orleans, Louisiana 70116

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Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

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Appeal Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555