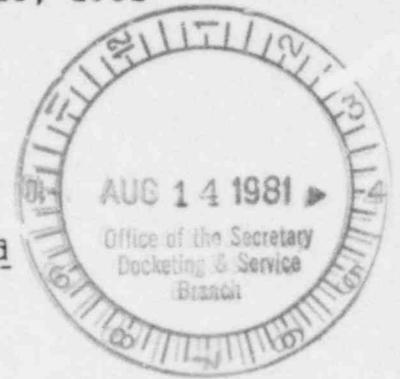


August 13, 1981

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 LOUISIANA CONSUMER'S LEAGUE, INC.  
(SECOND SET)



Pursuant to 10 C.F.R. § 2.740b, Louisiana Power and Light Company ("Applicant") submits the following interrogatories to be answered separately and fully in writing under oath or affirmation by Louisiana Consumer's League, Inc. ("LCL"). In accordance with paragraph 3 of the September 25, 1979 Discovery Stipulation, these interrogatories relate to new information in the NRC Staff's Safety Evaluation Report Related to the Operation of Waterford Steam Electric Station, Unit No. 3 ("SER") 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.

DS03  
s  
1/1

INTERROGATORIES ON CONTENTION 3

3-1. Does LCL contend that the arrangements made by Applicant for traffic control, and in particular the agreement between Applicant and the United States Coast Guard for traffic control on the Mississippi River (SER § 2.1.2) do not constitute "appropriate and effective arrangements . . . to control traffic" as required by 10 C.F.R. § 100.3(a)?

3-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support LCL's contention that Applicant has not provided for appropriate and effective arrangements to control traffic within the exclusion area.

3-3. If the answer to Interrogatory No. 3-1 is affirmative, identify by author, title and date all documents upon which LCL relies in contending that Applicant has not provided for appropriate and effective arrangements to control traffic within the exclusion area.

3-4. If the answer to Interrogatory No. 3-1 is affirmative, identify all persons whom LCL expects to testify on its behalf concerning its contention that applicant has not provided for appropriate and effective arrangements to control traffic within the exclusion area.

3-5. The SER (§ 2.1.2) states that up to ten people may be fishing within the exclusion area at any given time.

Does LCL contend that such usage will prohibit Applicant from controlling activities within the exclusion area?

3-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support LCL's contention that such usage will prohibit Applicant from controlling activities within the exclusion area.

3-7. If the answer to Interrogatory No. 3-5 is affirmative, identify by author, title and date all documents upon which LCL relies in contending that such usage will prohibit Applicant from controlling activities within the exclusion area.

3-8. If the answer to Interrogatory No. 3-5 is affirmative, identify all persons whom LCL expects to testify on its behalf concerning its contention that such usage will prohibit Applicant from controlling activities within the exclusion area.

3-9. State whether LCL contends that the SER (§ 2.1.2) is incorrect in stating that, with regard to activities within the exclusion area not related to the operation of Waterford 3, "these activities . . . will not interfere with normal operation of the nuclear facility. The Applicant has the authority to control such activities and has described procedures to be followed for these activities in the event of an emergency," and that "Applicant has the requisite authority

over the entire exclusion area as defined in 10 C.F.R. § 100.3(a)."

3-10. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support LCL's contention that Applicant has not demonstrated that it can control activities in the exclusion area as required by 10 C.F.R. § 100.3(a).

3-11. If the answer to Interrogatory No. 3-9 is affirmative, identify by author, title and date all documents upon which LCL relies in contending that Applicant has not demonstrated its ability to control activities in the exclusion area as required by 10 C.F.R. § 100.3(a).

3-12. If the answer to Interrogatory No. 3-9 is affirmative, identify all persons whom LCL expects to testify on its behalf concerning its contention that Applicant has not demonstrated that it can control activities in the exclusion area as required by 10 C.F.R. § 100.3(a).

3-13. State separately for each answer to the preceding interrogatories on Contention 3 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 4

4-1. The SER (§ 13.3.2.10) states that the Waterford 3 Emergency Plan contains provisions for recommending offsite protective measures, including evacuation, depending on projected dose to the environs and includes maps and information regarding evacuation routes, areas, shelters and area population distribution. Does LCL contend that these provisions do not include recommendations for evacuating the low population zone?

4-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support LCL's contention that no provisions have been made for evacuating the low population zone.

4-3. If the answer to Interrogatory No. 4-1 is affirmative, identify by author, title and date all documents upon which LCL relies in contending that Applicant has failed to make provisions for evacuating the low population zone.

4-4. If the answer to Interrogatory No. 4-1 is affirmative, identify all persons whom LCL expects to testify on its behalf concerning its contention that Applicant has failed to make provisions to evacuate the low population zone.

4-5. State separately for each answer to the preceding interrogatories on Contention 4 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 6

6-1. The SER (§ 6.3.2) states that a failure modes and effects analysis was presented by the Applicant covering the mechanical equipment in the ECCS. This analysis indicated that no single active failure could prevent the ECCS from fulfilling its short- and long-term functions. Does LCL contend that a postulated operator error during a loss of coolant accident ("LOCA") would have more severe effects upon the capability of the ECCS to perform its core cooling functions than the active failures analyzed by Applicant?

6-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support LCL's contention that a postulated operator error during a LOCA would have more severe effects upon ECCS capability than the analyzed active failures.

6-3. If the answer to Interrogatory No. 6-1 is affirmative, identify by author, title and date all documents upon which LCL relies in contending that a postulated operator error during a LOCA would have more severe effects upon ECCS capability than the analyzed active failures.

6-4. If the answer to Interrogatory No. 6-1 is affirmative, identify all persons whom LCL expects to testify on its behalf concerning its contention that a postulated operator error during a LOCA would have more severe effects upon ECCS capability than the analyzed active failures.

6-5. State separately for each answer to the preceding interrogatories on Contention 6 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 AMENDED CONTENTION (TMI-RELATED) 1

1A-1. Appendix C of the SER (at C-12, 13) discusses the current status of the Staff's efforts towards resolving generic task A-17, "Systems Interaction in Nuclear Power Plants," and concludes:

It is expected that the development of systematic ways to identify, rank, and evaluate systems interactions will go further to reduce the likelihood of intersystem failures resulting in the loss of plant safety functions. However, the studies to date indicate that current review procedures and criteria supplemented by the application of post-TMI findings and risk studies provide reasonable assurance that the effects of potential systems interactions on public safety will be within the effects on public safety previously evaluated.

Therefore, the staff concludes that there is reasonable assurance that Waterford 3 can be operated before the final resolution of this generic issue without endangering the health and safety of the public.

State whether LCL disagrees with this statement.

1A-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support LCL's contention that Waterford 3 cannot be operated pending final resolution of this generic issue without endangering the health and safety of the public.

1A-3. If the answer to Interrogatory No. 1A-1 is affirmative, identify by author, title and date all documents upon which LCL relies in contending that Waterford 3 cannot be operated pending final resolution of this generic issue without endangering the health and safety of the public.

1A-4. If the answer to Interrogatory No. 1A-1 is affirmative, identify all persons whom LCL expects to testify on its behalf concerning its contention that Waterford 3 cannot be operated pending final resolution of this generic issue without endangering the health and safety of the public.

1A-5. State separately for each answer to the preceding interrogatories on Amended Contention (TMI-Related) #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 on which the answer was based.

INTERROGATORIES ON AMENDED CONTENTION (TMI-RELATED) 4

4A-1. Table 15.8 of the SER states that, with respect to the dose calculations performed for a postulated LOCA, it was assumed that 50% of the iodine and 100% of the noble gases were released to the containment. Does LCL contend that these fission product releases are less than those which occurred during the Three Mile Island Unit 2 accident?

4A-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support LCL's contention that fission product releases to the containment assumed for a postulated LOCA, as set forth in Table 15.8 of the SER, are less than those that actually occurred during the Three Mile Island Unit 2 accident.

4A-3. If the answer to Interrogatory No. 4A-1 is affirmative, identify by author, title and date all documents upon which LCL relies in contending that the assumed fission product releases to the containment for a postulated LOCA, as set forth in Table 15.8 of the SER, are less than those that actually occurred during the Three Mile Island Unit 2 accident.

4A-4. If the answer to Interrogatory no. 4A-1 is affirmative, identify all persons whom LCL expects to testify on its behalf concerning its contention that the assumed fission product releases to the containment for a postulated LOCA, as set forth in Table 15.8 of the SER, are less than

those that actually occurred during the Three Mile Island Unit 2 accident.

4A-5. State separately for each answer to the preceding interrogatories or Amended Contention (TMI-Related) 4 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 on which the answer was based.

DATED: August 13, 1981.

Respectfully submitted,

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

By: Ernest L. Blake, Jr.  
Ernest L. Blake, Jr.  
James B. Hamlin

Counsel for Applicant

August 13, 1981

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
LOUISIANA POWER & LIGHT COMPANY ) Docket No. 50-382  
 )  
(Waterford Steam Electric )  
Station, Unit 3) )

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicant's Interrogatories To Louisiana Consumer's League, Inc. (Second Set), dated August 13, 1981, were served upon those persons on the attached Service List, by deposit in the United States mail, postage prepaid, this 13th day of August, 1981.

Ernest L. Blake, Jr.  
Ernest L. Blake, Jr.

DATED: August 13, 1981.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
LOUISIANA POWER & LIGHT COMPANY ) Docket No. 50-382  
 )  
(Waterford Steam Electric )  
Station, Unit 3) )

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

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

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