

9/2/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
HOUSTON LIGHTING AND POWER COMPANY)
(Allens Creek Nuclear Generating)
Station, Unit 1)

Docket No. 50-466



NRC STAFF FIRST SET OF INTERROGATORIES RELATING TO
DOHERTY AMENDED CONTENTION 21 TO JOHN DOHERTY

Pursuant to 10 C.F.R. §2.740b, the following interrogatories are directed to John Doherty relating to his Amended Contention 21.

Each interrogatory is to be answered separately and fully in writing under oath or affirmation. The answers should be supplemented as required by §2.740(e). Please do not hesitate to supplement your responses to questions as more complete answers become available to you. Section 2.740b requires interrogatories to be answered within 14 days of service. Five days are added to this time under §2.710 when service is by mail.

With regard to your Amended Contention 21 provide the following information:

1. Identify the individual(s), if any, that you intend to present as witnesses. The identification should include the individual's name, affiliation, and a summary of educational and professional background of each individual.

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2. Provide a reasonable description of the substance of the testimony of any witness(es) that you intend to have, including an identification of all documents that will be relied upon by them in that testimony.
3. Following the substantive response to each interrogatory, identify all documents and studies relied upon by you in providing your answers to that interrogatory. Identification should be specific to the portion of the document or study relied upon. Studies shall be deemed to include observations, calculations, literature and other types of work, whether recorded in writing or not, which consist of an examination or analysis of a phenomenon.
4. Following the substantive response to each of the subsequent interrogatories identify by name and affiliation each individual who has knowledge which served as a basis for the answer to that interrogatory.
5. Amended Contention 21 has been admitted by the Board, at your suggestion, to a consideration of power core density and the adequacy of the ODYN code to demonstrate the reactor scram curve. State in what way the power core density is an important parameter to consider in assessing BWR core behavior during overpressure transients. In addition, state how the power core density is an important parameter in an analysis using the ODYN code.

6. State the facts upon which you rely in supporting the allegation that the ODYN code cannot be relied upon to accurately predict BWR core behavior and reference all documents relied upon in your answer.
7. State the facts upon which you rely in supporting your allegation that plant derating will result if the reactor scram curve cannot be accurately predicted by use of the ODYN code.
8. What is the amount of plant derating that might result if the reactor scram curve cannot be accurately predicted?
9. If plant derating should occur, what is the basis for your belief that this will intensify the requirement for new generating facilities?
10. What is your understanding about the alleged derating that occurred at Browns Ferry 1 and 2, Quad Cities 1 and 2, and Pilgrim Station?

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CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF FIRST SET OF INTERROGATORIES RELATING TO DOHERTY AMENDED CONTENTION 21 TO JOHN DOHERTY in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 2nd day of September, 1981.

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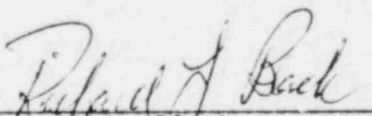
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