

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH *emf*

In the Matter of

PUGET SOUND POWER & LIGHT)
COMPANY, et al.)

Nos. STN 50-522, 50-523

(Skagit/Hanford Nuclear)
Project, Units 1 and 2)

- DATE: September 17, 1982

RESPONSE OF THE NATURAL RESOURCES DEFENSE COUNCIL
TO APPLICANTS' FIRST SET OF INTERROGATORIES

The Natural Resources Defense Council (NRDC) submits the following answers to Applicants' first set of interrogatories. These responses were prepared by Ralph Cavanagh, attorney of record for NRDC in this proceeding, who affirms that all representations herein are true and accurate to the best of his knowledge.

Interrogatory 1

Most of NRDC's bases for each contention admitted by the Licensing Board are identified in the Supplement to NRDC's Amended Petition for Leave to Intervene, filed with the Licensing Board and served upon Applicants on April 20, 1982 (hereinafter cited as "NRDC Contentions"). Additional documents, not then available, either now provide or are expected to provide further support for NRDC's contentions. These include:

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For contention 3, "The Applicants will not be able to market surplus output from the Skagit/Hanford Project outside the Pacific Northwest Region":

- (3:1) California Energy Commission, Biennial Report IV
(Electricity) (to be published in January of 1983)

For contention 4, "Applicants' Application for Site Certification/Environmental Report does not adequately discuss reasonable alternatives to the Skagit/Hanford Nuclear Project":

- (4:1) Incorporates, by reference, documents cited above under "Contention 1," nos. 1:2 and 1:3
- (4:2) Battelle Pacific Northwest Laboratories, Assessment of Electric Power Conservation and Supply Resources for the Pacific Northwest (sixteen volumes; June 1982)

Interrogatory 2

All bases identified above are documents.

Interrogatory 3

Each document has been cited in full, either in the response to Interrogatory 1 or in NRDC Contentions, supra; each has been or will be published by the agency or organization specified as the author, and each should be readily available to Applicants. There follows a brief description of the way each document identified for the first time in the response to Interrogatory 1 supports or is expected to support the contention to which it was referred in that response. See also NRDC Contentions, supra, for comparable descriptions of the documents identified therein.

(1:4) BPA's "Role EIS" documents exhaustively the merits of a so-called "one-utility" planning concept, in which loads and resources are balanced on a regional basis, rather than district-by-district. See, e.g., pp. iv-vii; and Sections III and IV.

(2:1) All three of these documents contain, or are expected to contain, amply documented estimates of regional demand growth that are substantially lower than those of the forecasts upon which Applicants rely.

(2:2) This is the latest in a series of long-range forecasts prepared annually by the Pacific Northwest Utilities Conference Committee, a body whose membership includes Applicants and other Northwest utilities (see NRDC contentions, supra pp. 7-11). At the hearing stage, NRDC expects to document both the internal inadequacies of this forecast and its manifest inconsistency with independent analyses that are entitled to greater deference from the NRC (items 1:1, 1:2, and 1:3 above).

(3:1) The California Energy Commission's Fourth Biennial Report is now being prepared, as required by Public Resources Code § 25309. NRDC expects that report, which serves as the cornerstone of California energy planning, to reconfirm that the state does not need electricity from the Skagit/Hanford nuclear project to meet demand growth or reduce oil and gas consumption. Obviously, as in the case of the Northwest Power Planning Council's plan, final conclusions about the report's implications must await its publication, now scheduled for January of 1983.

of this response, many but not all volumes had been published; the Council expects to produce the full set by the end of September 1982. In every volume we have been able to review, the Council's contractors have produced estimates of the potential for alternatives to Skagit/Hanford that substantially exceed those developed by Applicants. E.g., Vol. I (residential sector conservation potential of 4961 average MW in existing and new buildings); Vol. II (commercial sector conservation potential of 731 average MW in existing and new buildings); Vol. VI (2610 MW net capacity for geothermal electricity generation); Vol. X (potential contribution of wind energy exceeds 2200 MW of capacity and 770 average MW of energy by year 2000, at cost of less than 40 mills/kWh).

Interrogatory 4

Answered, to the extent relevant, under Interrogatory 3, above.

Interrogatory 5

Answered, to the extent relevant, under Interrogatory 3, above.

Interrogatory 6

We do not presently plan to rely on any of the sources specified in Interrogatory 6.

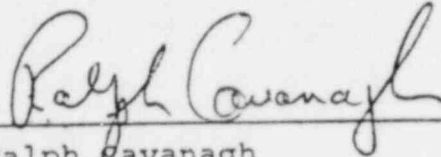
NRDC reserves the right to call as additional witnesses staff members of the Bonneville Power Administration, the Northwest Power Planning Council, and the California Energy Commission, as well as one or more of the Washington state employees who authored Final Report to the Washington State Legislature: Independent Review of Washington Public Power Supply System Nuclear Plants 4 and 5 (March 1982). It is NRDC's position, however, that the Licensing Board should independently solicit testimony on need for power issues from each of these bodies, pursuant to the Board's duty to develop a complete record on questions vital to the outcome of this proceeding. These are not partisan witnesses, but state and federal officials charged by law with assessing the very questions put to the Board by the National Environmental Policy Act and by NRDC's four contentions. We stand ready to begin discussions with Applicants, NRC staff, the Board, and the other intervenors, aimed at reaching agreement (1) on suitable BPA, Regional Council, California Energy Commission, and Washington State witnesses who should be subpoenaed to testify by the Board, and (2) on the appropriate scope of their testimony. We do not believe that NRDC or any other intervenor should be required to solicit or underwrite this crucial testimony, but if the Board disagrees, we reserve the right to make the attempt.

Interrogatory 8

NRDC presently intends to offer in evidence all the documents identified above in this response and in NRDC Contentions,

DATED: September 17, 1982

Respectfully submitted,

A handwritten signature in cursive script, reading "Ralph Cavanagh", is written over a horizontal line.

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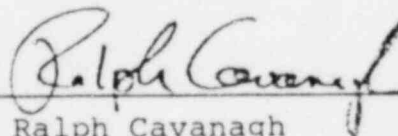
CERTIFICATE OF SERVICE

I hereby certify that the following:

1. Response of the Natural Resource Defense Council to Applicants' First Set of Interrogatories;
2. Natural Resources Defense Council's First Set of Interrogatories to Applicants

in the above-captioned proceeding have been served upon the persons shown on the attached list by depositing copies thereof in the United States mail on September 17, 1982 with proper postage affixed for first class mail.

DATED: September 17, 1982



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SKAGIT/HANFORD SERVICE LIST

DATED: September 17, 1982

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