

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'82 OCT 12 P12:09

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of

PUGET SOUND POWER & LIGHT	)	
COMPANY, et al.	)	Docket Nos. STN 50-522
	)	STN 50-523
	)	
(Skagit/Hanford Nuclear	)	October 6, 1982
<u>Project, Units 1 and 2)</u>	)	

APPLICANTS' RESPONSE TO NRDC'S  
FIRST SET OF INTERROGATORIES

Applicants submit the following answers to NRDC's first set of interrogatories dated September 17, 1982. These responses were prepared by F. Theodore Thomsen, one of the attorneys for Applicants in this proceeding, who affirms that these responses are true and correct to the best of his knowledge and belief.

Interrogatory 1

Contentions 1 and 2

1. The Applicants will not need the electricity to be generated by the Skagit/Hanford Nuclear Project to serve loads in the Pacific Northwest Region.

2. The Applicants' projections of regional electricity demand are unreasonable.

Most of Applicants' bases for opposing NRDC's contentions 1 and 2 are identified in Chapter 1 of the S/HNP ASC/ER as

8210130498 821006  
PDR ADDCK 05000522  
G PDR

DS03

amended by Amendment 7 dated September 16, 1982. Additional documents, not available when Amendment 7 was prepared, are expected to provide further support for opposing NRDC's contentions 1 and 2. These include:

- 1.1 Northwest Power Planning Council, Regional Conservation and Electric Power Plan (to be prepared pursuant to 16 U.S.C. § 839b; publication in draft form is scheduled for February 1983, with the final version to follow in April 1983).
- 1.2 Pacific Northwest Utilities Conference Committee, 1983 Northwest Regional Forecast of Power Loads and Resources (scheduled to be issued in the spring of 1983).
- 1.3 The 1983 long-range load forecast of each of the four Applicants (currently being prepared for inclusion in the PNUCC 1983 NRF, document 1.2 above).

### Contention 3

3. The Applicants will not be able to market surplus output from the Skagit/Hanford Project outside the Pacific Northwest Region.

If the evidence demonstrates a need or potential need for the output of S/HNP to serve Applicants' loads or other loads within the Pacific Northwest Region, NRDC's contention 3 will be irrelevant and need not be addressed in this proceeding. Since Applicants believe that the evidence (including the yet-to-be-issued documents identified as documents 1.1, 1.2, and 1.3 above) will so demonstrate, Applicants have not at this time identified the evidence they would present in opposition

to NRDC's contention 3, should it become relevant and necessary to refute. Notwithstanding the foregoing, Applicants do intend to review the documents that have been identified by NRDC in support of this contention so as to be in a position to respond further to this interrogatory in due course.

Contention 4

4. Applicants' Application for Site Certification/Environmental Report does not adequately discuss reasonable alternatives to the Skagit/Hanford Nuclear Project.

Most of Applicants' bases for opposing NRDC's contention 4 are identified in Chapter 9 of the S/HNP ASC/ER as amended by Amendment 7 dated September 16, 1982. Additional documents, not available when Amendment 7 was prepared, are expected to provide further support for opposing NRDC's contention 4.

These include:

1.1 Document 1.1, Regional Conservation and Electric Power Plan, cited above under contentions 1 and 2.

1.4 Pacific Northwest Utilities Conference Committee (future reports concerning cogeneration, hydro and other potential alternative resources).

Interrogatory 2

All bases identified above are documents and, in addition, these bases are supported by the documents listed as references in Chapters 1 and 9 of the S/HNP ASC/ER as amended by Amendment 7.

### Interrogatory 3

Each document has been cited in full, either in the response to Interrogatory 1 or in Chapter 1 or 9 of the S/HNP ASC/ER as amended by Amendment 7; each has been or will be published by the agency or organization specified as the author, and each should be readily available to NRDC. There follows a brief description of the way each document identified for the first time in the response to Interrogatory 1 refutes or is expected to refute the contention to which it was referred in that response. See also Chapters 1 and 9, supra, for comparable descriptions of the documents identified therein.

The yet-to-be-issued documents identified above as documents 1.1, 1.2, and 1.3 are expected to show a need or potential need for the output of S/HNP to serve Applicants' loads or other loads within the Pacific Northwest Region. Since these documents have not yet been issued, it is not possible at this time to provide a detailed explanation as to how each of these documents refutes NRDC's contentions 1 and 2. However, see the explanations in Chapter 1 of the S/HNP ASC/ER relating to the current versions of documents 1.2 and 1.3.

The yet-to-be-issued documents identified above as documents 1.1 and 1.4 are expected to present a further discussion of potential alternatives to S/HNP and to provide a

basis for concluding that the alternatives urged by NRDC do not, either individually or collectively, constitute a practicable alternative superior to S/HNP.

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.

Interrogatory 7

Applicants presently intend to offer the testimony of the following witnesses to address the following subjects in relation to NRDC's contentions 1, 2, and 4 (and 3, if necessary):

Puget Sound Power & Light Company

1. Robert V. Myers  
Vice President, Generation Resources  
Subject: Generation resources, including alternatives to S/HNP.
2. David Hoff  
Director, Corporate Planning  
Subject: Load forecast, including the effect of conservation.

Portland General Electric Company

3. Charles E. Allcock  
Branch Manager, Load Forecasting  
Subject: Load forecast, including the effect of conservation.
4. Norman L. Sanesi  
Supervisor, Generation Planning  
Subject: Generation resources, including alternatives to S/HNP.

Pacific Power & Light Company

5. Scott Hannigan, Manager  
Load Forecasting and Analysis Department  
Subject: Load forecast, including the effect of conservation.
6. Robert C. Wilson  
Power Resource Coordinating Supervisor  
Subject: Generation resources.
7. Sam L. Campagna, Manager  
Advanced Engineering Department  
Subject: Alternatives to S/HNP.

The Washington Water Power Company

8. Randall H. Barcus  
Economic Analyst  
Subject: Load forecast, including the effect of conservation.
9. H. Douglas Young  
Power Resource Engineer  
Subject: Generation resources, including alternatives to S/HNP.

Applicants reserve the right to call such additional witnesses as may be necessary, including staff members of the Northwest Power Planning Council, the Pacific Northwest Utilities Conference Committee, and the Bonneville Power Administration.

#### Interrogatory 8

Applicants presently intend to offer in evidence the S/HNP ASC/ER as it may then have been amended and the documents identified above in this response as documents 1.1, 1.2, and 1.3. The subject matter to which each such document relates, and the information in each document that refutes NRDC's contentions, are explained in the earlier sections of this response and in Chapter 1 of the S/HNP ASC/ER. Applicants reserve the right to offer in evidence any of the references listed in Chapter 1 or 9 of the S/HNP ASC/ER or any of the documents identified above in this response as document 1.4 in the event any of these documents comes into question and becomes especially relevant and material to the Licensing Board's decision regarding NRDC's contentions.

#### Interrogatory 9

Applicants do not presently intend to offer any evidence in opposition to NRDC's already-admitted contentions not identified in their answers to Interrogatories 7 and 8, except as otherwise indicated above with respect to NRDC's contention 3. However, Applicants reserve the right to offer in opposition to NRDC's already-admitted contentions documents, research, conversations, correspondence or other communications

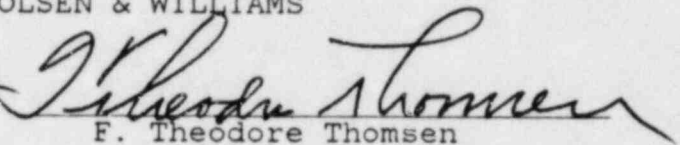
not yet published or available, including those that may be elicited during the discovery process, if such materials prove relevant to the Licensing Board's decisions regarding these contentions. Should Applicants choose to offer such documents or other materials, they also reserve the right to call as witnesses those involved in their preparation.

DATED: October 6, 1982.

Respectfully submitted,

PERKINS, COIE, STONE,  
OLSEN & WILLIAMS

BY

  
F. Theodore Thomsen

Attorneys for Applicant  
1900 Washington Building  
Seattle, Washington 98101  
Phone (206) 682-8770