

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

_____)
In the Matter of)
)
BOSTON EDISON COMPANY et al.)
)
(Pilgrim Nuclear Generating)
Station, Unit 2))
_____)

Docket No. 50-471



COMMONWEALTH OF MASSACHUSETTS
FIRST SET OF INTERROGATORIES
TO THE APPLICANTS RELATIVE
TO TMI ISSUES

Pursuant to 10 C.F.R. §§2.740b and 2.741, the Commonwealth of Massachusetts requests that the following Interrogatories be answered fully, in writing, and under oath by an officer or agent of Boston Edison Company.

For purposes of these interrogatories the term "document(s)" refers to the original and copy (but not both if identical in every respect) of any printed, written, recorded, transcribed, punched, taped, filmed, photographed or graphic matter, whether sent or received or neither, whether a draft or otherwise, however produced or reproduced, and both sides thereof, including but not limited to, any memorandum, correspondence, letter, affidavit, court paper, transcript, diary, report, study, telegram, table, telex message, record,

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chart, paper, work paper, graph, index, book, notebook, pamphlet, periodical, tape, data sheet, data processing card, note, notation, minute desk calendar, appointment book, sound recording, computer print-out or microfilm.

INTERROGATORIES

1. For each and every information requirement contained in Appendix B to NUREG-0718, Rev. 1, list the requirement and indicate whether, in the Applicants' opinion, their application for a construction permit, including the PSAR and amendments thereto, satisfies said requirement. Whether your response for any given requirement is in the affirmative or negative, explain in detail the reasons for your answer, identifying each fact upon which you rely and each document, and the particular parts thereof, of which you are aware which supports each fact so identified. Describe in detail all exceptions from or modifications to the information requirements and all alternative approaches to meeting the requirements requested of and/or allowed by the NRC Staff.

2. Identify all correspondence, memoranda, comments, transcripts, meeting minutes or summaries, notes or records of conversations, and other documents within the possession, custody, or control of the Applicants, Combustion Engineering ("CE"), or Bechtel which relate in any way to communications between the Applicants, CE or Bechtel and the NRC, between the Applicants and CE, between the Applicants and Bechtel, between

the Applicants and the CE Owners Group, or between CE and the CE Owners Group regarding any information requirement contained in NUREG-0718, Rev. 1, Appendix B, or in NUREG-0718, Appendix B. For each such document, identify its author(s), addressee(s), if any, subject, and location and provide a brief description of the contents thereof.

3. For each and every recommendation and requirement contained in NUREG-0578, at pages 6-20 and Appendix A, list the requirement and indicate whether, in the Applicants' opinion, their application for a construction permit, including the PSAR and amendments thereto, satisfies said requirement. Whether your response for any given requirement is in the affirmative or negative, explain in detail the reasons for your answer, identifying each fact upon which you rely and each document, and the particular parts thereof, of which you are aware which supports each fact so identified. Describe in detail all exceptions from or modifications to the requirements and all alternative approaches to meeting the requirements requested of and/or allowed by the NRC Staff.

4. Identify all correspondence, memoranda, comments, meeting minutes or summaries, notes or records of conversations, and other documents within the possession, custody, or control of the Applicants, CE, or Bechtel which relate in any way to communications between the Applicants, CE, or Bechtel and the NRC, between the Applicants and CE, between

the Applicants and Bechtel, between the Applicants and the CE Owners Group, or between CE and the CE Owners Group regarding any requirement contained in NUREG-0578. For each such document, identify its author(s), addresses(s), if any, subject, and location and provide a brief description of the contents thereof.

5. For each Action Plan Item listed in NUREG-0660 and designated therein as applying to construction permit applications which does not appear in NUREG-0578 or NUREG-0718, Rev. 1, Appendix B, please list each requirement set forth in NUREG-0660 under such item and indicate whether, in the Applicants' opinion, their application for a construction permit, including the PSAR and amendments thereto, satisfies said requirement. Whether your response for any given requirement is in the affirmative or negative, explain in detail the reasons for your answer, identifying each fact upon which you rely and each document, and the particular parts thereof, of which you are aware which supports each fact so identified. Describe in detail all exceptions from or modifications to the requirements and all alternative approaches to meeting the requirements requested of and/or allowed by the NRC Staff.

6. Identify all correspondence, memoranda, comments, meeting minutes or summaries, notes or records of conversations, and other documents within the possession, custody, or control of the Applicants, CE, or Bechtel which

relate in any way to communications between the Applicants, CE, or Bechtel and the NRC, between the Applicants and CE, between the Applicants and Bechtel, between the Applicants and the CE Owners Group, or between CE and the CE Owners Group regarding any requirement listed in answer to interrogatory 5 above. For each such document, identify its author(s), addresses(s), if any, subject, and location and provide a brief description of the contents thereof.

7. For each requirement contained in the Commission's proposed final rule on TMI requirements for construction permit and manufacturing license applications, as set forth in Enclosure 1 to Eisenhut's July 14, 1981 letter to all such applicants, list the requirement and indicate whether, in the Applicants' opinion, their application for a construction permit, including the PSAR and amendments thereto, satisfies said requirement. Whether your response for any given requirement is in the affirmative or negative, explain in detail the reasons for your answer, identifying each fact upon which you rely and each document, and the particular parts thereof, of which you are aware which supports each fact so identified. Describe in detail all exceptions from or modifications to the requirements and all alternative approaches to meeting the requirements requested of and/or allowed by the NRC Staff.

8. Identify all correspondence, memoranda, comments, meeting minutes or summaries, notes or records of conversations, and other documents within the possession, custody, or control of the Applicants, CE, or Bechtel which relate in any way to communications between the Applicants, CE, or Bechtel and the NRC, between the Applicants and CE, between the Applicants and Bechtel, between the Applicants and the CE Owners Group, or between CE and the CE Owners Group regarding any requirement listed in your answer to interrogatory 7. For each such document, identify its author(s), addresses(s), if any, subject, and location and provide a brief description of the contents thereof.

9. Amendment 43 to the PSAR indicates, at page 1C-8, that the Applicants will perform a site consequence analysis. Please describe in detail the anticipated scope, methodology, and schedule for said analysis, identifying any contracts which the Applicants have entered into for the conduct of the study, and indicating whether the so-called "CRAC" Code will be used.

10. Applicants have committed in PSAR Amendment 43 to performing a site/plant-specific probabilistic risk assessment (PRA). List all key reactor systems contributing to accident initiation or mitigation which will be addressed in the PRA and describe the criteria followed in identifying those systems. In the opinion of the Applicants, will the PRA be scheduled so that it will be feasible to incorporate into the design any

modification which might be indicated by the results thereof? If not, list all such modifications which might be precluded or rendered infeasible.

11. The Applicants have committed in PSAR Amendment 43 to conducting a number of additional studies or evaluations and submitting additional or modified system designs on the basis thereof. With respect to each such commitment, indicate the dates by which the study will be completed and the design submitted and identify any design modifications which might be indicated by said study but which, in the opinion of the Applicants, might be precluded or rendered infeasible by the time the study is completed.

12. Identify every individual who contributed to the substance of PSAR Amendment 42 or 43.

13. Identify all individuals whom the Applicants intend to call as witnesses on TMI issues and provide their qualifications. Also provide for each such individual a list of all proceedings of any kind before any tribunal in which said individual has testified and the subject matter of his or her testimony on each such occasion. Also provide for each such individual a list of all reports, studies, papers, articles, and books, whether published or not, and whether a draft or not, relating in any way to the TMI accident, the lessons learned therefrom, or any of the requirements listed in your responses to interrogatories 1, 3, 5, or 7 above, prepared

in part or in whole by said individual or by a corporation, partnership, or other organization of which said individual is an employee, officer, director, partner, or agent.

14. PSAR Amendment 43 states, at p. 1C-48, that the "present Pilgrim Unit 2 design includes much of the instrumentation that meets the requirements of Rev. 2 of Regulatory Guide 1.97." List every instrument currently within the Unit 2 design which, in the Applicants' opinion meets the requirements of R.G. 1.97, Rev. 2, indicating in each case the particular requirement which it satisfies. Provide a separate list of all requirements of R.G. 1.97, Rev. 2 which are not satisfied by the current design.

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CERTIFICATE OF SERVICE

I hereby certify that the within Interrogatories have been served on the following by deposit of copies thereof in the United States Mail, first class mail, postage prepaid this 18th day of August, 1981:

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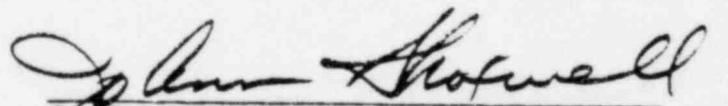
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