In the Matter COMPANY et al.

(Clinton Power Station Unit 1)

NOV 17 P1:48

Docket No. 50-461 OL

PRAIRIE ALLIANCE'S PARTIAL SECOND ROUND OF DISCOVERY TO ILLINOIS POWER COMPANY, et al.

Pursuant to 10 CFR 2.740(b) of the Nuclear Regulatory Commissior's regulations, Prairie Alliance requests that Illinois Power Company (IP) answer the attached interrogatories fully, to the best of their knowledge, in writing, and under oath, and that the answers be signed by the person(s) making them.

In addition, pursuant to 10 CFR 2.741, Prairie Alliance requests that IP produce and permit Prairie Alliance to inspect and copy designated documents in possession, custody or control of IP.

Each quest'on shall be answered as follows:

1. Provide the direct answer to the question.

2. Provide documents, including research, studies, calculations, memoranda, correspondence, reports, diagrams, computer codes, and all other r cords, that were relied upon by IP in answering the question, and also those which served as the basis for the answer.

3. Identify by name, title, and qualifications the IP employee that has the expert knowldege required to support the answer to the question.

4. Explain whether IP is presently engaged in or intends to engage in any further research cr work which may affect the answer. Identify such research or work.

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5. State the names, addresses, titles, and qualifications of the persons IP intends to call as witnesses or experts for the answer and the subject matter which they intend to testify about.

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6. Provide the computer codes, in machine readable source code, of any computer models or simulations is vant to the question asked.

INTERROGATORIES

 (Regarding contention 1(a (1)): With respect to the actions proposed by local and state agencies to effect termination of activities at outdoor recreational facilities other than at Clinton Lake:

a) Identify each facility for which actions are proposed.

b) Identify all agencies responsible for termination of activities at such facilities.

c) Describe the methods by which IP has ascertained that such local and state agencies have the capacity to take appropriate action in the event of a radiological emergency.

d) Specify the numbers and qualifications of local and state personnel expected to be involved in the termination of activities.

e) Describe the types of equipment which local and state agencies will have at their disposal for use in the termination of activities.

 (Regarding contention 1(a)(3)): With respect to the severeweather conditions which may be expected in the site vicinity and plume and ingestion EPZ's throughout the year,

a) Describe what provisions if any, have been made to notify the general public in the plume and ingestion EPZ's of an emergency during severe weather conditions which interfere with or cause a breakdown in television and radio broadcasting.

b) Describe what provisions, if any, have been made to insure that offsite personnel needed to augment the onsite staff in the event of an emergency will arrive onsite promptly during severe weather conditions such as ice storms or blizzards.

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c) Describe what provisions, if any, have been made to insure prompt evacuation of the general public within the plume exposure EPZ in the event of a severe weather condition, such as an ice storm or a blizzard.
d) If local and state agencies are responsible for any actions or provisions mentioned in parts a-c of this interrogatory, describe the methodology used by IP to determine that such agencies are capable of making timely, appropriate responses to emergency situations in the event of a severe weather condition such as an ice storm or blizzard.
e) Describe the types of equipment which local and state agencies will have at their disposal for use for evacuation in the event of an emergency during an ice storm or blizzard or other severe weather condition.

3. (Regarding contentions 1(d)(2) and 1(d)(3)): With respect to the role of the Illinois Department of Nuclear Safety in the CPS Emergency Plan:
a) Describe the criteria for determining the need for notification and participation of the Department in the event of an emergency.

b) Identify the person(s) who developed the criteria, and his/her/their title(s) and qualifications.

c) Identify the titles and qualifications of the person(s) responsible for evaluating the criteria and determining the need for notification and participation of the Department.

d) For each level of emergency, state the anticipated time lapse between the occurrence of an emergency and notification of the Department.
e) For each level of emergency, state the anticipated time lapse between notification of the Department and an appropriate onsite response by the Radiological Assessment Team.

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4. (Regarding contentions 1(d)(2) and 1(d)(3)): With respect to the roles of the Illinois and DeWitt Coursey Emergency Services and Disaster Agencies in the CPS Emergency Plan:

a) State for each agency the criteria for determining the need for notification and participation of the agencies in the event of an emergency.

b) Identify the purson(s) who developed the criteria, and state his/her/their title(s) and qualifications.

c) State the title(s) and qualifications of the person(s) responsible for evaluating the criteria and determining the need for notification of each agency in the event of an emergency.

d) For each level of emergency, state the anticipated time lapse between occurrence of the emergency and notification of each agency.
e) For each level of emergency, state the anticipated time lapse between notification of each agency and an appropriate response by each agency.

 (Regarding contentions 1(d)(2) and 1(d)(3)): With respect to the role of the Chicago Department of Energy and the Argonne laboratory in the CPS Emergency Plan,

a) State the criteria for determining the need for notification and participation of each in the event of an emergency.

b) Identify the person(s) who developed the criteria, and state her/his/their title(s) and qualifications.

c) Identify the person(s) responsible for evaluating the criteria and determining the need for notification of the Department and the Argonne lab in the event of an emergency.

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 d) Describe the circumstances in which IP will request a team of radiation specialists pursuant to the Interagency Radiological Assistance Plan.

e) State whether services provided by the Chicago Department and the Argonne laboratory are available on a 24 hour per day basis.
f) State the anticipated time lapse between the occurrence of an emergency and notification of the Chicago Department of Energy and the

Argonne laboratory.

g) State the anticipated time lapse between notification and an appropriate onsite or offsite response by radiation specialists pursuant to the Interagency Radiological Assistance Plan.

- (Regarding contentions 1(d)(2) and 1(d)(3)): Describe all inform tion, calculations, and methods which IP used in its determination that state and local agencies responsible for any aspect of the Emergency Plan are capable of making time y and appropriate responses in the event of a radiological emergency. Include, but do not limit your answer to, a detailed description of each the agency's emergency response plans. Provide copies of all documents, memoranda, communications, letters of agreement, and other papers describing the actions each such agency will take in the event of a radiological emergency.
- 7. (Regarding contention 1(d)(2)): With respect to CPS No. OAP1890.02N
 3.2 concerning followup messages after initial notification of offsite agencies;

a) State what methods of disseminating followup messages exist, listing such methods in their perceived order of effectiveness.

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- 7. b) State the criteria (determining which method is the "best available," and state the title(s) and qualifications of the person(s) responsible for determining which method will be utilized.
 c) State why radio transmission is to be arvoided in followup messages.
- 8. (Regarding contention 1(d)(5)): Describe the methods, if any, by which offsite done projections will be made in the 30-60 minutes following an emergency but prior to the arrival onsite of the Supervisor -Rad Chem or Supervisor - Radia tion Protection. If such methods exist, state the title(s) and qualifica ion⁻⁻ the person(s) responsible for making such projections.
- 9. (Regarding contention 1(e)): With respect to CPS Emergency Plan 9.3:
 a) State whether or not IP has made any plans or agreements to date with any news media concerning:
 - 1) Provision of complete emergency plans to such media,
 - 2) Provision of detailed emergency training for such media,
 - Establishment of points of contact for the release of information during an emergency for such media.
 - Arrangements for the timely exchange of information between IP and the media.

b) For each classification of emergency, state the anticipated frequency of the exchange of information between IP and the media.

c) If any plans or agreements have been made, state (by name and type) with which media such plans or agreements have been made Also, state (by name and type) with which media such plans or agreements will be made in the future. d) Briefly describe and attach copies of each plan or agreement reached with each media source to date.

e) If no such plans have been made, state when, if ever, IP plans to make such plans or agreements. If none will ever be made, state why not.

- 10. (Regarding contention 9): With respect to CPS OAP1890.04N 2.1.2 concerning immediate actions to be taken in the event of an Unusual Event:
 - a) State under what circumstances it will be inappropriate to make a statement to plant personnel describing the event.

b) State the criticia used to make this determination, and the name(s), title(s) and qualifications of the person(s) making the determination.

c) Identify the person who developed the criteria by name, title, and qualifications.

11. (Regarding contention 9): With respect to CPS 0AP1890.04N 3.2.⁴ concerning restoration activities:

a) State how the frequency of monitoring and decontamination is to be determined.

b) Identify by name(s), title(s), and qualifications the person(s) responsible for such determinations.

12. (Regarding contention). With respect to CPS Emergency Plan 12.1.1:
a) Identify by name, title, and qualifications each person who will be responsible for weighing the projected dose against the benefits to be gained.

 b) State the criteria for determining when the benefits to be gained will exceed the dangers of high dosage.

c) Describe the circumstances in which volunteers will be utilized, and and the circumstances in which volunteers will not be used. For situations in which volunteers will not be used, describe the personnel who will be required to accept greater than normal dose limits.

- 13. (Regarding contention 11): With respect to CPS Emergency Plan 12.1.2., state why responsible officials are not required to initiate protective actions when the projected exposure to the general public equals or exceeds 1 rem whole body or 5 rem thyroid.
- 14. (Regarding contention 1(d)): With respect to CF3 Emergency Plan 12.2.3, describe all administrative and physical means which are available to promptly notify the public within the plume exposure EPZ of an abnormal or emergency condition.

a) Describe the types of equipment and identify the personnel which will be utilized in any notification of the public.

b) Describe the methods by which state and local governments will activate the system.

c) Describe all information, calculations, methods, etc., which were utilzed by IP in determining that state and local government agencies are capable of activating the system.

15. (Regarding contention1d3, 1e) With respect to CPS Emergency Plan 12.3 concerning evacuation:

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15. a) State the criteria utilized by state and local government officials in determining when to evacuate the general public.

b) Describe the public evacuation procedures and list locations for relocation centers contained in the state and local government emergency plans listed at CPS FSAR Emergency Plan 12.3.2.

c) Provide copies of all state and local government emergency plans described in 12.3.2.

d) Describe all information of any kind, including calculations, methods of determination, etc., which were utilized by IP in confirming local and state governmental capability to carry out an effective and timely evacuation of the general public.

e) Describe all equipment which local and state governmental agencies have at their disposal to effect an evacuation of persons who own no private means of trans tation.

- 16. (Regarding contention 1b): With respect to CPS Emergency Plan 14.3.1 concerning IP's agreement with John Warner Hospital, describe in detail the equipment and staff available for dealing with radiation injuries.
- 17. (Regarding contention 1c): With respect to CPS Emergency Plan 17.2, describe in detail the site specific emergency response training for all offsite emergency response organizations. Provide copies of such training plans.
- 18. (Regarding contention lc): With respect to CPS Emergency Plan 17.3, describe in detail the sponialized training which shall be provided in the following areas:

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- 18. a) Directors and coordinators of response organizations.
 - b) Personnel responsible for accident assessment.
 - c) Radiological monitoring teams.
 - d) Police, security, and fire fighting personnel.
 - e) Repair and damage control teams.
 - f) First Aid and rescue personnel.
 - g) Local support ESDA personnel.
 - h) Medical support personnel.
 - i) IPC headquarters support personnel.

19. Provide copies of the following supporting plans:

- a) Illinois Plan for Radiological Assistance.
- b) DeWitt County Emergency Response Plan.
- c) Illinois Comprehensive Disaster Response Plan.

Second Round Interrogatories Pertaining to Contention #6

a) Provide documents related to accuracy of indication of water level using reference leg differential pressure monitor, particularly those studies concerning calibration and possible instrument failure scenarios, boilout, etc.

b) Produce documents which show how shutdown water level indication information wouldlbe interpreted at other than design conditions.c) Provide documents relating to application of losse parts monitoring

LPM to reactor pressure vessel integrity.

d) Provide information on the extent of IP's involvement in the various BWR group and subcommittee meetings. Include lists of personnel attending, monies pledged and other pertinent details.

e) Produce documents and studies used in justifying non-safety grade equipment in additional accident and post-accident monitoring devices.
f)Provide documents produced by IP as input for formulation of NRC document CR/1580.

g)Provide documents produced for NRC control room minireview.h) Provide documents pertaining to display console system and its reliability, and software controlling automated program selection and its reliability.

 Provide reliability studies for computer and microprocessors used in CR, including expected downtime and time between specific dysfunction and repair.

j) Provide documents delineating how NRC commissioned research on disturbance analysis DAS will be incorporated into CR software.

(12)

CERTIFICATION OF SERVICE

I certify that I caused an original and two copies of the foregoing document to be served on the following:

Secretary of the Commission United States Nuclear Regulatory Commission Washington, D.C. 20555 Attn: Docketing and Servicing Branch

and that I caused one copy of the foregoing document to be served upon each

of the following:

• • • •

Hugh K. Clark, Esq. Chairman P.O. Box 127A Kennedyville, Maryland 21645

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in each case by deposit in the United States Mail, postage prepaid on the

13 day of November 1981.

Charles men

Charles Bacon Representative for Prairie Alliance