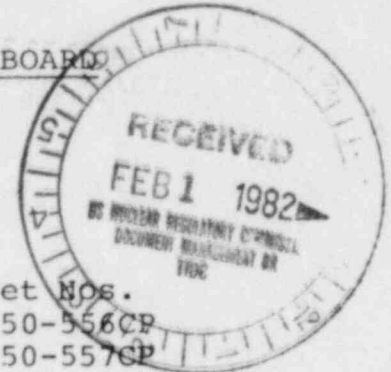


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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of the Application of)
Public Service Company of Oklahoma,)
Associated Electric Cooperative, Inc.)
and)
Western Farmers Electric Cooperative) Docket NOS.
(Black Fox Units 1 and 2)) STN 50-556CP
) STN 50-557CP



INTERVENORS' INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS TO APPLICANTS

Pursuant to 10 C.F.R. § 2.740b, Intervenors direct the following interrogatories to the Applicants pursuant to the Atomic Safety and Licensing Board's (the "Board") Order of October 14, 1981, and Order of December 17, 1981, (following prehearing conference). Further, pursuant to 10 C.F.R. § 2.741, the Intervenors hereby request that the Applicants furnish copies of or permit the Intervenors to inspect and copy any documents responsive to the following requests and and which are in the possession, custody or control of the Applicants.

Both the Interrogatories and the Request for Documents are continuing in nature. The Applicants must supplement or amend, as appropriate, their Answers, should they obtain any new or differing information responsive to the Interrog-

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atories; and must also produce any additional documents they obtain which are responsive to the requests.

When identification of a document is requested, describe the document by title, author, addressee, date, and relevant page citations.

For the purposes of these Interrogatories and Requests, the term "contention" means a subject matter admitted by the Board in its Order of December 17, 1981, whether originally advanced as a contention by Intervenor or as a Motion by one of the parties to reopen the closed evidentiary record.

GENERAL QUESTIONS:

(a) Each question is to be answered in five parts as follows:

(i) Provide the direct answer to the question.

(ii) Identify all documents and studies, and the particulars thereof, relied upon by the Applicants, now or in the past, which serve as the basis for the answer. In lieu thereof, at Applicants' option, a copy of such document and study may be attached to the answer.

(iii) Identify all documents and studies, and the particular parts thereof, examined but not relied upon by the Applicants, which pertain to the subject matter questioned. In lieu thereof, at Applicants' option, a copy of each such document and study may be attached to the answer.

(iv) Explain whether the Applicants and/or any independent contractor are presently engaged in or intend to engage in further research or work which may bear on the issues covered in the interrogatory. If so, please identify such research or work and the person(s) responsible therefor.

(v) Identify the expert(s), if any, whom the Applicants intend to have testify on the subject matter covered in the interrogatory. State the qualifications of each such expert. (2) Present a summary of each expert's proposed testimony on each contention. (3) Identify all cases in which any such expert has previously testified and state the subject matter of such testimony.

(b) Answer each of the following five preliminary questions for every contention:

(i) Explain the present Applicants' position on each of the Intervenors' contentions.

(ii) Identify the specific sections and page numbers of the PSAR for Black Fox Station and the NRC Staff's SER and SER Supplements for Black Fox Station which are relied upon in formulating the Applicants' position on Intervenors' contentions.

(iii) Identify all sections and page numbers of the PSAR, SER and SER Supplements which contain subject matter pertaining to Intervenors' contentions.

SPECIFIC INTERROGATORIES AND DOCUMENT REQUESTS:

Motion to Reopen - IGSCC

1. Please provide a list of all piping systems to be used at Black Fox classified as important to safety where 304 stainless material will still be used.

2. Please provide all background information and other information as specified in the five-part lists concerning the background information, analyses, etc., that led to the decision to replace the recirculation piping material.

3. Please provide any probabilistic studies supporting the change.

4. Please provide reports of environmental testing of 316K stainless material relevant to its selection for this application.

5. Please provide information on any future changes to the PSAR that you anticipate will be required as a result of this change.

Motion to Reopen - Load Combination

1. Please provide all information relevant to PSO or Black & Veatch studies or analyses of possible changes that may result from the change in load combination methodology and the impact of that change on the Black Fox plant.

2. Please provide any anticipated changes that may be required to the PSAR that has not already been accomplished in Amendment 17.

3. Please provide details of any exemptions that may be required in order for the plant to be in compliance with the leak testing requirements as specified in Appendix J.

Motion to Open - QA

1. Provide qualifications and experience of PSO and B&V QA/QC Staff.

2. Provide a current organization chart showing QA/QC responsibilities.

3. Provide copies of current PSO and B&V QA manuals, and procedures which implement the manuals.

4. Provide copies of all QA/QC audits and surveillances conducted by PSO and B&V during 1980, 1981, and 1982 YTD including both external and internal audits.

Motion to Reopen - Generic Issues

1. Provide all documents describing changes in BFS design to accommodate generic issues which have been developed since the BFS ASLB hearings.

2. Provide all updates developed by GE to the BFS related matters set forth in the GE "Reed Report".

3. Provide all documents prepared in 1979, 1980, 1981, and 1982 YTD for or by the GE owners group related to generic issues.

Contention 6 - Degraded Core

1. Provide all generic or BFS site-specific, deterministic or probabilistic assessments of accident probability, accident consequence, or risk study conducted by or for BFS related to accidental releases through the air or liquid pathways.

2. Describe all accident with failures in excess of the "single-feature" criterion assessed by PSO and the results of such an evaluation.

3. Provide plan, schedule, and outline of any reliability study being conducted or planned by PSO.

4. Provide all documents which demonstrate that reliability studies will be completed in a timely fashion such that any needed plant modifications will not be precluded by the construction status.

Contention 13, 14, and 15, - Emergency Preparedness

1. Provide all GE owners group documents related to emergency preparedness which have been issued since 1979.

2. Provide a listing of current design documents prepared by PSO, B&V, and GE related to emergency preparedness measures set forth in NUREG-0654 applicable to the plant license.

3. Provide all sensitivity studies, either generic or site-specific which PSO will rely on, showing the impact on accident consequences resulting from variations in sheltering, soil migration properties, local meteorology, and time of year of release.

4. Provide all generic and specific documents related to BFS evacuation time estimates.

5. Provide all documents related to, and justifying, the siting of the EOF over 20 miles from the BFS site.

Contention 1 - Environmental Qualification

1. Does the Applicant contend that they will comply with the NUREG-0588 and NUREG-0737 requirements for environmental qualification of each and every device, system or component added as a result of TMI?

(a) If the answer is affirmative, state each and every document, report and reasoning that supports the position.

(b) If the answer is negative give details of each area or example where the requirements may not be met?

(c) Supply one copy of each document cited above.

2. How has the Applicant provided assurance that each item provided for Post Accident Monitoring will be adequately qualified? State the details as well as the documents and reports which support the Applicants position.

Contention 2(a) - Post Accident Monitoring

1. Please describe in detail how the Applicant plans to monitor Halogens from all potential release points in Black Fox.

2. What is the planned times required to obtain a reading of release quantities based on individual sample drawn from each release point.

3. How does the Applicant plan to provide continuous monitoring of Halogens?

4. Does the Applicant believe he will meet the full requirements of Reg Guide 1.97 and II.F.1, II.F.2, II.F.3 of NUREG-0737?

(a) If the answer is affirmative, give all documents, analyses and reasoning which confirms this position.

(b) If the answer is negative, give a clear description of each area and the reasons for not complying

Contention 4 - Human Factors

1. State each and every review of Human Factors performed on the control room design for Black Fox.

(a) Site the reports and documents which support this.

(b) Provide copies of the reports cited.

2. Has the Applicant reviewed the Black Fox control room against the criteria in NUREG-0700?

(a) If so, provide the detailed results of the review.

3. Has the Applicant reviewed the control room design of Black Fox against the criteria in NUREG-0801 (Evaluation Criteria for detailed Control Room Design Reviews)?

(a) If the answer is affirmative, provide the detailed results.

(b) If the answer is negative, site the justification or plans to conduct such a review.

4. Has there been any actual operating experience on the Black Fox control room design at other operating reactors?

(a) If the answer is yes, provide details of which plants and how long.

Contention 9 - Water Level/Inadequate Core Cooling

1. Does the Applicant plan to install a means of unambiguously detecting the onset of ICC? Explain the answer in detail.

2. Does the Applicant plan to install In-core Thermocouples as a means of detecting the onset of ICC? Explain the response in detail.

3. Has the Applicant revised the design of water level measurement to eliminate the multiple reference points for measurement? Explain the answer in detail.

4. How does the Applicant plan to provide an indication of fuel temperature for use by the operators as an indication of the onset of ICC?

Respectfully submitted,

FELDMAN, HALL, FRANZEN & WOODARD

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

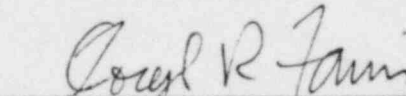
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CERTIFICATE OF SERVICE

I, Joseph R. Farris, one of the attorneys for Citizens Action for Safe Energy (C.A.S.E.), certify that copies of the following:

"Intervenors' Interrogatories and
Request for Production of Documents
to NRC Staff"

have been served on the persons shown on the attached list by United States Mail, postage prepaid, this 25 day of January, 1982.



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Date: January 25, 1982

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