

January 30, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
CLEVELAND ELECTRIC ILLUMINATING	)	Docket Nos. 50-440
COMPANY, Et Al.	)	50-441
	)	(Operating License)
(Perry Nuclear Power Plant,	)	
Units 1 and 2)	)	
	)	

OHIO CITIZENS FOR RESPONSIBLE ENERGY  
SECOND SET OF INTERROGATORIES TO STAFF

Ohio Citizens for Responsible Energy ("OCRE") hereby propounds its second set of interrogatories to Staff pursuant to the Licensing Board's Order of July 28, 1981. A statement of purpose will follow.

- 2-1. What method for detecting the presence of corbicula in Lake Erie near PWRP does the Staff recommend? Explain.
- 2-2. In its response to OCRE interrogatory 1-21, Staff stated that the "discharge structure of the Perry plant, however, is an offshore, submerged, high-velocity diffuser that should provide no thermal habitat or refuge for the clams." Please state the basis(es) for that statement. It would be helpful if a contrast between those conditions which create a good thermal habitat or refuge and those that do not would be provided.
- 2-3. In its response to OCRE interrogatory 1-22, Staff listed equipment which were serviced by the Emergency Service Water System. Characterize that equipment in terms of vulnerability to postulated biofouling due to clams, eg. which heat exchangers or condensers are most susceptible?
- 2-4. List all those nuclear power plants in the United States and Puerto Rico where corbicula was known to be present in the vicinity of the plant or still is present. (Omit Arkansas Nuclear One as this Intervenor is aware of that situation.)
- 2-5. For those plants listed in 2-4 above, characterize the corbicula/plant interaction as being either negative (a problem) or otherwise. For each such plant with a negative interaction, enumerate the extent of the problem, eg. what equipment was affected?
- 2-6. For those negative interactions listed in 2-5 above, outline the licensee's attempts to control the problem. Note also the relative success of the

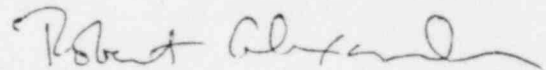
different methods used.

- 2-7. Assuming corbicula is detected in the vicinity of Perry plant, what control methods does Staff recommend? If Staff still has not yet analyzed methods for detecting and preventing potential flow blockage at Perry caused by corbicula, when does it expect to have such analysis completed?
- 2-8. In its response to OCRE interrogatory 1-19, Staff states that "(n)either the cost effectiveness nor the environmental implications of hypothetical forms of clam control are at issue in this proceeding." Please explain and provide factual bases for that statement. Also, interpret the significance of the following portion of Issue 7: "...and (Applicant) has not demonstrated how it could adequately cope with these clams should they be present." Order of July 28, 1981 at 84.

Statement of Purpose

The purpose of the foregoing interrogatories is to clarify the scope of Issue 7, ascertain the factual bases upon which the NRC Staff expects to found its support of an operating license with regard to Issue 7, and to further prepare OCRE for the offering of evidence on this issue.

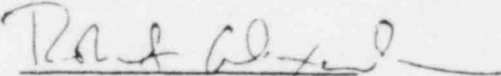
Respectfully submitted ,



Robert Alexander  
OCRE Interim Representative  
2030 Portsmouth St. #2  
Houston, TX 77098

CERTIFICATE OF SERVICE

This is to certify that copies of OCRE First Set of Interrogatories to Applicant and OCRE Second Set of Interrogatories to Staff have been served upon the following persons by deposit, postage prepaid, in the United States mail this 30th day of January, 1982.

  
Robert Alexander

SERVICE LIST

Peter B. Bloch, Chairman  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Jerry R. Klein  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Frederick J. Shon  
Atomic Safety & Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

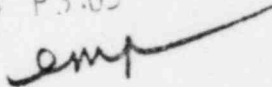
Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Charles A. Barth, Esq.  
Office of the Executive Legal  
Director  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Jay Silberg, Esq.  
1800 M Street, N.W.  
Washington, D.C. 20036

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