

RELATED CORRESPONDENCE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 12 APR 12 AM 11:33

In the Matter of)
)
DUKE POWER COMPANY, et al.)
)
(Catawba Nuclear Station,)
Units 1 and 2))

Docket Nos. 50-413
50-414

APPLICANTS' FIRST SET OF INTERROGATORIES
TO PALMETTO ALLIANCE AND REQUESTS TO PRODUCE



Pursuant to 10 CFR §§2.740b and 2.741, Duke Power Company, et al. ("Applicants") hereby serve Applicants' First Set of Interrogatories and Requests to Produce upon Intervenor, Palmetto Alliance. These interrogatories involve Palmetto Alliance's Contentions 3, 4, 6, 7, 18, 40 and 43.

Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to Palmetto Alliance, its officers, directors or members as well as any pertinent information known to its employees, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of Palmetto Alliance, its officers, directors or members as well as its employees, advisors or counsel. In answering each interrogatory and in responding to each request, place recite the interrogatory or request preceding each answer or response. Also, please identify the person providing each answer or response.

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These interrogatories and requests shall be continuing in nature. Thus, any time Palmetto Alliance obtains information

which renders any previous response incorrect or indicates that a response was incorrect when made, Palmetto Alliance should supplement its previous response to the appropriate interrogatory or request to produce. Palmetto Alliance should also supplement its responses as necessary with respect to identification of each person expected to be called at the hearing as an expert witness, the subject matter of his or her testimony, and the substance of that testimony. Applicants are particularly interested in the names and areas of expertise of Palmetto Alliance's witnesses, if any. Each identification of such witnesses is necessary if Applicants are to be afforded adequate time to depose them.

The term "documents" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. We request that at a date or dates to be agreed upon, Palmetto Alliance make available for inspection and copying, all documents subject to the requests set forth below.

REQUESTS FOR DOCUMENTS

Pursuant to 10 CFR §2.741, Applicants request Palmetto Alliance by and through their attorneys, to make available for inspection and copying at a time and location to be designated, any and all documents, of whatsoever description, identified in the responses to the Applicants' interrogatories, below; including, but not limited to:

- (1) any written record of any oral communication between or among Intervenors, their advisors, consultants, agents, attorneys, and/or any other persons, including but not limited to the NRC Staff, the Applicants, and their advisors, consultants, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letter, memorandum, notes, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to work papers, prior drafts, and notes of meetings.

If Palmetto Alliance maintains some documents should not be made available for inspection, it should specify the documents and explain why such are not being made available. This request extends to any such document, described above, in the possession of Palmetto Alliance, its advisors, consultants, agents, or attorneys.

GENERAL INTERROGATORIES

Pursuant to 10 CFR §2.740b, the Applicants request Palmetto Alliance, by and through its attorneys, to answer separately and fully in writing under oath or affirmation, by persons having knowledge of the information requested, the following interrogatories.

A. General Interrogatories

The following interrogatories apply severally to each of the contentions admitted as issues in controversy in this proceeding.

1. Please state the full name, address, occupation and employer of each person answering the interrogatories and designate the interrogatory or the part thereof he or she answered.
2. Please identify each and every person whom you are considering to call as a witness at the hearing in this matter on this contention, and with respect to each such person, please:
 - a. State the substance of the facts and opinions to which the witness is expected to testify;
 - b. Give a summary of the grounds for each opinion; and
 - c. Describe the witness' educational and professional background.
3. Is the contention based on one or more calculations?
If so:
 - a. Describe each calculation and identify any documents setting forth such calculation.
 - b. Who performed each calculation?
 - c. When was each calculation performed?

- d. Describe each parameter used in such calculation and each value assigned to the parameter, and describe the source of your data.
 - e. What are the results of each calculation?
 - f. Explain in detail how each calculation provides a basis for the issue.
4. Is the contention based upon conversations, consultations, correspondence or any other type of communications with one or more individuals?
- If so:
- a. Identify by name and address each such individual.
 - b. State the educational and professional background of each such individual, including occupation and institutional affiliations.
 - c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
 - d. Describe the information received from such individuals and explain how it provides a basis for the issue.
 - e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence, or other communication with such individual.

B. Specific Interrogatories

Palmetto Alliance Contention 6

1. What do you mean by the term "substandard workmanship"?
2. What standard do you contend has not been met?
3. How do you contend that standard has not been met by the workmanship at the Catawba station?
4. What "workmanship" is the subject of this contention?
5. Please specify the activities and areas of plant construction for which you contend the workmanship is substandard?
6. Do you contend that the workmanship does not satisfy applicable NRC requirements?
7. If your response to Interrogatory 6 is in the affirmative, please specify all NRC requirements which you contend have not been satisfied.
8. For each of the NRC requirements identified in your response to Interrogatory 7, please relate the particular aspects of "substandard workmanship" to the specific NRC requirements you contend have not been satisfied.
9. What are your bases for your responses to Interrogatories 1 through 8? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
10. What do mean by "poor quality control"?
11. Specifically, what do you contend constitutes "poor" quality control?

12. By "poor," do you contend that applicable NRC requirements regarding quality control are not met?
13. If your response to Interrogatory 12 is in the affirmative, please specify those NRC requirements concerning quality control which you contend are not met.
14. With regard to Interrogatory 13, please specify in what manner you contend those NRC requirements have not been met.
15. What do you mean by the term "quality control"?
16. Do you contend there is an relationship between "poor quality control" and "substandard workmanship"?
17. If your response to Interrogatory 16 is in the affirmative, please specify what that relationship is.
18. If your response to Interrogatory 16 is in the negative, please explain the differences between "poor quality control" and "substandard workmanship" which you perceive.
19. What are your bases for your responses to Interrogatories 10 through 18? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
20. What do you mean by "strongly suggest"?
21. Do you mean that NRC requirements have not been satisfied when you say "strongly suggest"?

22. If your response to Interrogatory 21 is in the affirmative, please specify those NRC requirements which you contend have not been met.
23. If your response to Interrogatory 21 is in the negative, please explain what you contend must be litigated with respect to this contention.
24. What are your bases for your responses to Interrogatories 20 through 23? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
25. What do you mean by "actual plant construction"?
26. Does the term "actual" have any significance in terms of your contention?
27. If your response to Interrogatory 26 is in the affirmative, please explain what that significance is to your Contention.
28. What areas of "actual plant construction" are the subject of your Contention?
29. For each of the areas identified in your response to Interrogatory 28, please specify each instance of "substandard workmanship" or "poor quality control" which you contend has occurred.
30. For each instance identified in your response to Interrogatory 29, please specify the location within the plant at which you contend such workmanship took place.

31. For each of the instances identified in your response to Interrogatory 29, please identify the date and time of occurrence at which you contend such workmanship took place.
32. Have you identified any individuals who you contend performed such poor quality control or substandard workmanship?
33. If so, please identify those individuals by name and current address.
34. Identify the particular occurrence which you contend each individual identified in your response to Interrogatory 33 was involved with.
35. What are your bases for your responses to Interrogatories 25 thru 34? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
36. What do you mean by the term "substantially below"?
37. Do you mean that applicable NRC requirements have not been satisfied?
38. If your response to Interrogatory 37 is in the affirmative, please identify those NRC requirements.
39. What are the "NRC standards" which are the subject of this Contention?
40. Identify each instance of plant construction for which you contend a particular standard identified in your response to Interrogatory 39 has not been met.

41. What are the "safety related areas" to which you contend the NRC standards identified in your response to Interrogatory 39 apply?
42. Identify separately each of the safety related areas and the NRC standard which you contend applies to that area.
43. In what ways do you contend the safety related areas identified in your responses to Interrogatory 41 relate to the safe operation of the plant?
44. Identify each construction activity which is involved in those safety related areas which are the subject of this Contention.
45. What is the relationship, if any, between each example of substandard workmanship which you contend has occurred in these safety related areas?
46. What is the relationship, if any, between each instance of poor quality control which you contend has occurred in these safety related areas?
47. Do you contend that there are instances of substandard workmanship that have not been corrected? If so, please identify.
48. Do you contend that there are instances of poor quality control which Applicants have not corrected? If so, please identify.

49. Do you contend there are any instances of plant construction which do not satisfy NRC standards which the Applicants have not corrected? If so, please identify.
50. If the response to Interrogatory 49 is in the affirmative, please specify those instances of construction.
51. Do you contend that there are instances of plant construction which do not satisfy NRC requirements which Applicants have identified but have not corrected?
52. What are your bases for your responses to Interrogatories 36 through 51? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely on in support of your position.
53. In what way do you contend Applicants have "failed to provide" a quality assurance program?
54. Do you contend Applicants have not submitted an appropriate quality assurance program to the NRC?
55. Do you contend Applicants have not developed and implemented an appropriate quality assurance program?
56. If your responses to any of Interrogatories 53-55 are in the affirmative, please explain in detail the substance of your contention for each such affirmative response.
57. What are your bases for your responses to Interrogatories 53 through 56? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely on in support of your position.

58. What is the "quality assurance program" which you contend is the subject of this Contention?
59. Do you contend that the Applicants' policies for implementing its quality assurance program are inadequate? If so, please explain your concern.
60. Do you contend that the Applicants' procedures for implementing its quality assurance program are inadequate? If so, please explain your concern.
61. Do you contend that the Applicants' instructions for implementing its quality assurance program are inadequate? If so, please explain your concern.
62. What are the specific requirements of 10 C.F.R. Part 50, Appendix B which you contend Applicants' quality assurance program does not satisfy?
63. With regard to those requirements of 10 C.F.R. Part 50, Appendix B which you contend Applicants do not satisfy, identify the exact concern which you have and provide the bases for that concern. Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
64. What aspects of operation of the Catawba Station do you contend would be affected by your allegations concerning the quality assurance program for Catawba?

65. What is bases for your responses to Interrogatory 64? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
66. With respect to the NRC "Systematic Assessment of Licensee Performance Review Group" report, do you contend that that assessment demonstrates that Applicants have not satisfied the requirements of 10 C.F.R. Part 50, Appendix B?
67. If your response to Interrogatory 66 is in the affirmative, please specify the particular findings of that report which you contend demonstrate that Applicants have not satisfied the requirements of 10 C.F.R. Part 50, Appendix B.
68. What portions of that report do you intend to rely upon in support of your position on this Contention?
69. Do you contend that the "management" aspects of Applicants' quality assurance program mentioned in NUREG-0834 do not satisfy the requirements of 10 C.F.R. Part 50, Appendix B?
70. If your response to Interrogatory 69 is in the affirmative, please specify those aspects of Applicants' quality assurance management you contend do not satisfy the requirements of 10 C.F.R. Part 50, Appendix B.

71. For each of the management functions identified in your response to Interrogatory 70, please specify the precise concern which you have in this Contention.
72. Please define what you mean by the term "training"?
73. Please identify those "areas of quality assurance" concerning training which you contend do not satisfy NRC requirements.
74. For each of the aspects of training identified in your response to Interrogatory 73, please specify the precise concerns which you have with that program.
75. What are your bases for your responses to Interrogatories 65 through 74? Identify all documents, testimony or oral statement by any person and legal requirements on which you rely in support of your position.

The following interrogatories concerning Duke "employees" should be construed to cover both current and former employees.

76. How many "former Duke Power Company construction workers" or other employees do you intend to rely upon in support of your allegations in this Contention?
77. Please provide the names and addresses of each construction worker or other employee on whom you intend to rely in support of your position on this Contention.
78. Provide the term of employment for each construction worker or other employee on whom you intend to rely in support of your position on this Contention.

79. Provide the position, or positions, held by each construction worker or other employee on whom you intend to rely in support of your position on this Contention.
80. Provide the specific allegations by each construction worker or other employee on whom you intend to rely in support of your position on this Contention.
81. What are the bases for your responses to Interrogatories 76 through 80? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely on in support of your position.
82. Besides the statements of these construction workers or other employees, is there any other information on which you intend to rely in support of their allegations? If so, please identify.
83. Identify the "certified quality control inspector" on whom you intend to rely in support of this Contention.
84. Please provide the address of that quality control inspector.
85. What was the term of employment of that quality control inspector.
86. What positions did that person hold during his term of employment?
87. What is the substance of the allegations of that quality control Inspector on whom you intend to rely in support of your position on this Contention?

88. Is there any other information concerning the allegations made by the quality control inspector which support your position on this Contention? If so, please identify.
89. Did the identified construction workers or former employees bring their concerns to the attention of other Duke Power Company employees, Duke Power Company supervisors, Duke Power Company management, NRC personnel, state personnel or personnel of any other local, state or federal agency?
90. If the answer to Interrogatory 89 is affirmative, identify the specific individuals to whom concerns were expressed and their exact positions.
91. If the answer to Interrogatory 89 is affirmative, when was the concern expressed and what was the specific nature of the concern expressed?
92. If the answer to Interrogatory 89 is affirmative, what was the response of the specific individuals to whom concerns were expressed?
93. If the answer to Interrogatory 89 is affirmative, was there any subsequent action on the part of any of the individuals or organizations referenced that has a bearing on this contention? If so, please identify.
94. With regard to Interrogatories 89 through 93, identify all documents, testimony or oral statements by any

person and legal requirements on which you rely on in support of your position.

95. What do you mean by the term "systematic"?
96. What are the "deficiencies" which you contend the former construction workers and other employees have alleged to occur?
97. For each deficiency identified in your response to Interrogatory 96, specify the exact location within the plant which you contend such deficiency occurred.
98. For each deficiency identified in your response to Interrogatory 96, please specify the exact time at which you contend such deficient activities occurred.
99. For each deficiency identified in your response to Interrogatory 96, please specify the person or persons whom you contend performed deficient work.
100. For each deficiency identified in your response to Interrogatory 96, specify the particular NRC requirement which that deficiency fails to satisfy.
101. What are your bases for your responses to Interrogatories 95 through 100? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
102. Are all deficiencies in plant construction which you allege have occurred at Catawba taken place in systems important to safety?

103. If your response to Interrogatory 102 is in the affirmative, please specify the particular safety system which you contend is affected by the deficiency.
104. If your response to Interrogatory 102 is in the negative, please specify the particular systems affected by the alleged deficiencies and the impact which you contend such deficiencies would have on plant operation.
105. Have the deficiencies alleged in answer to Interrogatories 103 and 104 been left uncorrected? If so, what is the basis for your answer?
106. What are your bases for your responses to Interrogatories 127 through 128? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
107. What is the "company pressure" which you contend has occurred?
108. Please specify each instance of "company pressure" and by whom such "company pressure" was brought.
109. Please identify each individual on whom you contend such pressure was brought to bear.
110. In what manner do you contend such pressure was brought?
111. Do you contend that such alleged "pressure" affected the quality of construction at Catawba?
112. If your response to Interrogatory 111 is in the affirmative, please specify every instance of inadequate

construction which you contend resulted from such alleged "pressure".

113. If your response to Interrogatory 111 is in the negative, please specify the significance, if any, which you perceive such alleged pressure has on construction.
114. What are your bases for your responses to Interrogatories 107 to 113? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
115. Define what you mean by the term "faulty workmanship"?
116. In what manner do you contend approval was to be given for alleged "faulty workmanship"?
117. To whom was such approval to be given and how was such approval to be given?
118. Do you contend that such approval was ever given?
119. If your response to Interrogatory 118 is in the affirmative, please identify the person who gave such approval.
120. If your response to Interrogatory 118 is in the affirmative, please identify what approval was given for particular tasks.
121. What is your bases for your responses to Interrogatories 117 thru 120? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
122. Identify each instance of "faulty workmanship" you contend exists at the Catawba facility?

123. For each instance of alleged "faulty workmanship" specify the date and time of occurrence.
124. For each instance of alleged "faulty workmanship" identify the person or persons whom you contend performed such "faulty workmanship."
125. For each individual identified in your response to Interrogatory 124, please specify the address of such individual and whether or not they are currently employed by Duke Power Company.
126. For each instance of alleged "faulty workmanship" identified in your response to Interrogatory 125, please specify the bases on which you rely to demonstrate that such workmanship occurred. In this regard, see Interrogatories 89 through 94 and also answer them as they pertain to Interrogatory 125.

Palmetto Alliance - Contention 7

1. What are the operating procedures which you contend are the subject of Contention 7?
2. What activities are these operating procedures intended to govern?
3. Who is to have developed these operating procedures?
4. Who is to have implemented those operating procedures?
5. Are these operating procedures already developed and implemented?

6. If the response to Interrogatory 5 is in the affirmative, please state where those operating procedures can be found.
7. If the response to Interrogatory 5 is in the negative, please explain the substance of your objection.
8. When where these operating procedures developed and implemented?
9. Are these operating procedures to be used at the Catawba facility?
10. If the response to Interrogatory 9 is in the negative, what is the applicability of this assertion to this proceeding?
11. What are your bases for your responses to Interrogatories 1 through 10? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
12. What are the administrative procedures which are the subject of this Contention?
13. Have these administrative procedures already been developed and implemented?
14. What activities do these administrative procedures govern?
15. Who developed these administrative procedures?
16. Who implemented these administrative procedures?

17. If the response to Interrogatory 13 is in the affirmative, in what areas have these procedures been implemented?
18. If the response to Interrogatory 13 is in the negative, please explain the substance of your objection.
19. When where these administrative procedures developed and implemented?
20. Have these administrative procedures been employed at Catawba?
21. If the response to Interrogatory 20 is in the negative, how is this Contention applicable to this proceeding?
22. What are your bases to your responses to Interrogatories 12 through 21? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
23. What do you mean by the Applicants' "consistent failure"?
24. By "consistent failure" do you mean that Applicants have not complied with applicable NRC regulations?
25. If your response to Interrogatory 24 is in the affirmative, please specify the NRC regulations which you contend are not met, the activities which you contend do not meet those requirements and the time of such noncompliance.
26. Do you maintain that Applicants remain in noncompliance with applicable regulations?

27. If your response to Interrogatory 26 is in the affirmative, please specify those failures which cause Applicants to remain in noncompliance with NRC requirements.
28. Who do you contend has consistently failed to satisfy NRC requirements? Specify the group or individual within Applicants' organization.
29. Do you contend that such "consistent failure" occurred at facilities other than Catawba? If so, identify those other facilities.
30. If your response to Interrogatory 29 is in the affirmative, do you contend such "consistent failure" at other facilities have application to the Catawba facility? If so, please explain the specific relationship.
31. What are your bases for your responses to Interrogatories 23 through 30? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
32. In what way do you contend Applicants did not "adhere" to operating and administrative procedures?
33. Specify each instance which you contend Applicants have not adhered to operating and administrating procedures.
34. What are your bases to your responses to Interrogatories 23 through 33? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.

35. What are the Commission rules and regulations which you contend provide for operating and administrative procedures to which you contend Applicants do not adhere?
36. For each of the operating procedures identified in your responses to Interrogatories 1 through 10, specify the particular regulations to which Applicants have not adhered.
37. For each of the administrative procedures identified in your responses to Interrogatories 12 through 21, specify the particular NRC regulations which apply to those procedures.
38. For each of the NRC regulations identified in your responses to Interrogatories 33 through 37, specify each instance of failure to adhere to procedural requirements for each regulation.
39. Do you contend that the allegations raised in the March 29, 1977 letter cited in your Contention applied to the Catawba facility?
40. If your response to Interrogatory 39 is in the affirmative please specify precisely which of the allegations made in that letter you contend apply to the Catawba facility.
41. Do you contend that the allegations made in the March 29, 1977 letter cited in your contention have not been corrected to the extent they apply to Catawba?

42. If your response to Interrogatory 41 is in the affirmative, please specify the particular allegations which you contend have not been corrected.
43. What are your bases to your responses to Interrogatories 39 through 42? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
44. What do you contend is meant by the share "weaknesses in personnel adherence to operating and administrative procedures"?
45. What are the particular "weaknesses" which you allege are present at Catawba with respect to this Contention?
46. What are the "operating and administrative procedures" referenced in NUREG-0834 on which you intend to rely in support of this Contention?
47. What are your specific concerns in regard to those "operating and administrative procedures"?
48. What group of "personnel" do you contend have not adhered to "operating and administrative procedures"?
49. What do you contend is meant by the term "failure to follow procedures"?
50. What "procedures" are referred to?
51. If the "procedures" identified in response to Interrogatory 50 are different from the response to Interrogatory 46 please explain.

52. What are the particular "failures" you rely upon?
53. What are your specific concerns in regard to those "failure to follow procedures"?
54. What group of personnel do you contend have failed to follow procedures?
55. What are your bases for your responses to Interrogatories 44 through 54? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.

Palmetto Alliance - Contention 40

1. What do you mean by the term "irregularities"?
2. Identify each and every "irregularity" which is the subject of this question.
3. For each "irregularity" identified in your response to Interrogatory 2, please specify the location, time of occurrence and person or persons who were involved.
4. When do you contend such "irregularities" occurred?
5. What do you contend was the cause of such "irregularities"?
6. What are your bases for your responses to Interrogatories 1-5? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
7. What "welding practices" are the subject of this Contention

and what person or persons do you contend engaged in such "welding practices"?

8. Specify when such "welding practices" occurred.
9. Where are the proper "welding practices" established?
10. Are the welding practices which are the subject of this Contention set forth in particular procedures?
11. If your response to Interrogatory 10 is in the affirmative, please specify the particular procedures which govern the "welding practices" which are the subject of this Contention.
12. For each of the procedures identified in your response to Interrogatory 11, set forth the specific problems which you contend occurred.
13. Do you contend that the "welding practices" which are the subject of this Contention fail to comply with certain standards?
14. If your response to Interrogatory 13 is in the affirmative, please identify the particular standards which are the subject of this Contention.
15. For each of the standards identified in your response to Interrogatory 14, please specify the particular concern which you have concerning "welding practices".
16. What are your bases for your responses to Interrogatories 7 through 15? Identify all documents, testimony or

oral statements by any person and legal requirements on which you rely in support of your position.

17. Identify each specific "safety related system" which is the subject of this Contention.
18. Specify the particular "welding practices" which you contend were performed on each of the "safety related systems" identified in your response to Interrogatory 17.
19. Specify for each of the "welding practices" associated with the "safety related systems" identified in your response to Interrogatory 18 the particular concerns which you have regarding the adequacy of such practices.
20. For each of the concerns identified in your response to Interrogatory 19, specify the time at which such concerns (i.e., problem) occurred.
21. For each concern identified in your response to Interrogatory 19, identify the person or persons who were involved and the situation giving rise to your concern.
22. For each concern identified in your response to Interrogatory 19, specify the cause which you attribute to such concerns.
23. What are your bases for your responses to Interrogatories 15 through 22? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.

24. Do you contend that the Applicants have not identified all "irregularities" in "welding practices" pursuant to their own inspection procedures?
25. If your response to Interrogatory 24 is in the affirmative, please specify the "irregularities" which you contend Applicants have not identified.
26. For each of the "irregularities" identified in your response to Interrogatory 25, answer each of the Interrogatories 1-5 above if you have not already done so.
27. If your response to Interrogatory 24 is in the negative, please specify precisely what your concern is with respect to "welding practices".
28. Do you contend that the NRC Staff has not identified the particular "welding practices" with which this Contention is concerned?
29. If your response to Interrogatory 28 is in the affirmative, please identify those instances of "welding practices" which you contend the NRC Staff does not identify.
30. For each of those instances "welding practices" identified in your response to Interrogatory 29, please answer Interrogatories 7 through 15 if you have not already done so for those particular practices.

31. If your response to Interrogatory 28 is in the negative, please explain exactly what your concern is with respect to "welding practices".
32. Do you contend that Applicants have not corrected all "irregularities" in welding practices"? If so, please explain, identifying the areas of the plant here such welds remain uncorrected.
33. What are your bases for your responses to Interrogatories 24 through 32? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
34. What do you mean by the term "endanger"?
35. Specify the consequences which you allege will follow from each "irregularity" in "welding practices" which are the subject of this Contention.
36. For each of the consequences identified in your response to Interrogatory 35, specify the particular "safety related system" involved in such a scenario.
37. Do you contend that the procedures applicable to welding at the Catawba facility are not in compliance with applicable NRC regulations?
38. If your response to any of the Interrogatory 37 is in the affirmative, please specify for your particular concern and specify the particular NRC requirements which you contend have not been satisfied.

39. What are your bases for your responses to Interrogatories 34 through 38? Identify all documents, testimony or oral statements by an person and legal requirements on which you rely in support of your position.

Palmetto Alliance - Contention 18

1. What do you mean by "failed to demonstrate"?
2. What information do you contend Applicants have not provided to satisfy the concern raised in Contention 18? Please specify.
3. What are your bases for your responses to Interrogatories 1 and 2? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
4. Are Applicants correct in assuming that this contention pertains to the two diesel generators at each of the Catawba units? If not, please explain.
5. In what way do you contend the diesel generators which are the subject of this Contention are "critical to the safe shutdown and control of the reactor in the event of loss of off-site power"?
6. Do you contend that the subject diesel generators at Catawba fail to comply with appropriate NRC regulation and regulatory guidance? If so, please provide reference to the specific regulation or regulatory guide and explain why such is not satisfied.

7. What do you contend are the functions of the diesel generators which are the subject of this Contention? Is this response consistent with the regulations and regulatory guidance? If not please explain.
8. What are the bases for your responses to Interrogatories 5 through 7? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
9. What do you mean by "critical to the...control of the reactor"?
10. In what way do you contend the diesel generators which are the subject of this contention are "critical to the...control of the reactor"?
11. In what way do you contend the diesel generators are not able to perform the functions which are "critical to the...control of the reactor"?
12. What are your bases to your responses to Interrogatories 9 through 11? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
13. What do you mean by "in the event of loss of off-site power"?
14. What do you mean by "designed"?

15. Who do you contend designed the diesel generators which are the subject of Contention 18?
16. Do you contend that the designer of the diesel generators improperly designed those generators?
17. If your response to Interrogatory 16 is in the affirmative, please specify those aspects of the design which you contend are inadequate.
18. Do you contend that any of the systems designed to support proper diesel generator operation are not designed satisfactorily?
19. If your response to Interrogatory 18 is in the affirmative, please specify each system which you contend is not designed satisfactorily.
20. For each of these systems identified in your response to Interrogatory 19, please specify the exact concern which you have.
21. What are your bases to your responses to Interrogatories 14 through 20? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
22. What do you mean by the term "constructed"?
23. Who do you contend "constructed" the diesel generators which are the subject of this Contention?
24. Do you contend that the construction of the diesel generators was inadequate?

25. If your response to Interrogatory 24 is in the affirmative, what aspects of that construction do you contend are inadequate?
26. What are your bases for your responses to Interrogatories 22 through 25? Identify all documents, testimony or oral statements by any person and legal documents on which you rely in support of your position.
27. What do you mean by "operated"?
28. Do you contend that the Applicants procedures and associated systems for operating the diesel generators are inadequate?
29. If your response to Interrogatory 28 is in the affirmative, please specify your concerns with respect to the procedures and associated systems for operating diesel generators.
30. What are your bases to your responses to Interrogatories 27 through 29? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
31. What are the "standards" which are the subject of this Contention?
32. Who do you contend is to implement those standards?

33. Who do you contend is responsible for developing those standards?
34. What activities do you contend those standards govern?
35. What are your bases for your responses to Interrogatories 31 through 34? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
36. What do mean by "sufficiently high"?
37. By what do you contend the standards must be judged to determine whether they are "sufficiently high"?
38. Who do you contend is to decide whether such standards are "sufficiently high"?
39. What are your bases for your responses to Interrogatories 36 through 38? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
40. What do you mean by the term "relied upon"?
41. Who do contend is to rely upon such standards?
41. What do you mean by "the FSAR does not give adequate information"?
43. What information do you contend is lacking?
44. What do you mean by "the FSAR does not give adequate... assurance"?

45. Do you contend that information in addition to that identified in your response to Interrogatory 43 must be supplied to provide "adequate assurance"?
46. If your response to Interrogatory 45 is in the affirmative, please identify and specify the additional information which you contend is required.
47. What are your bases for your responses to Interrogatories 40 through 46? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
48. What are the "regulatory requirements" which you contend are applicable to this Contention?
49. For each of the regulatory requirements identified in your response to Interrogatory 48, specify which of those requirements requires that the information which you contend must be supplied in response to Interrogatory 43.
50. With respect to your allegation concerning the generators used at the McGuire facility, please identify who or in what manner you were "informed".
51. Are there any written documents reflecting your being "informed"?
52. If your response to Interrogatory 51 is in the affirmative, please supply for inspection and copying all such written documents.

53. What do you mean by "used"?
54. Do you contend that such McGuire diesel generators are inadequate?
55. If your response to Interrogatory 54 is in the affirmative, how do you contend that allegation has any bearing upon the diesel generators at Catawba?
56. Please explain in detail any similarities you contend exist between the diesel generators used at McGuire and those used at Catawba and how such has a bearing on your contention.
57. What are your bases for your responses to Interrogatories 48 through 56? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.

Palmetto Alliance - Contention 43

1. What is the basis for this contention?
2. Please identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your response to Interrogatory 1.
3. What are the "effects" of Corbicula which you contend will occur?
4. What do you contend are the consequences of the "effects"?

5. How do you contend such "effects" will affect "performance of the cooling tower system"?
6. What do you contend are the components of the "cooling tower system" which will be affected by Corbicula?
7. For each of the components identified in your response to Interrogatory 6, specify the particular "effect" which you contend Corbicula will have.
8. What are your bases for your responses to Interrogatories 3 through 7? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
9. Do you contend there are any "effects" which have an adverse impact on the environment?
10. If your response to Interrogatory 9 is in the affirmative, please specify all such "effects."
11. Do you contend that any "effects" identified in your response to Interrogatory 10 tip the cost-benefit balance against licensing?
12. If your response to Interrogatory 11 is in the affirmative, please specify precisely what the "costs" which you contend tip the environmental cost-benefit balance against operation.
13. What are your bases for your responses to Interrogatories 8 through 12? Identify all documents, testimony

or oral statements by any person and legal requirements on which you rely in support of your position.

14. What is the extent of such infestation which you contend exists?
15. Do you contend such infestation is likely to extend to the Catawba site?
16. Do you contend that such "effects" will be detectable?
17. Do you contend that the "effects" of Corbicula are irreversible once they are detected?
18. If your response to Interrogatory 17 is in the affirmative, how do you explain that other facilities have adequately dealt with Corbicula?
19. If your response to Interrogatory 17 is in the negative, what concerns can you have for "the performance of the cooling tower system."
20. What are your bases for your responses to Interrogatories 13 through 18? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.

Palmetto Alliance - Contentions 3, 4, 26 and 35

1. For what purpose do you contend the communities identified in your Contentions should be included within the plume exposure pathway EPZ for Catawba?

2. Why do you contend each of these communities identified in your Contentions should be included in the plume exposure pathway EPZ?
3. Please specify the precise area which you contend the plume exposure pathway EPZ should encompass?
4. For all areas beyond ten miles from the facility which you specified in your response to Interrogatory 3, please explain in detail why you contend those areas should be included in the plume exposure pathway EPZ.
5. Do you contend that any other communities besides the three identified in your Contentions should be included within the plume exposure pathway EPZ? If so, why?
6. What are your bases for your responses to Interrogatories 1 through 5? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
7. What are the "local emergency response needs" which you refer to in your Contentions?
8. What are the specific locations of those response needs which are the subject of these Contentions?
9. Are those "local emergency response needs" unique to the area surrounding the Catawba facility?
10. If your response to Interrogatory 9 is in the affirmative, please specify the particular needs which you contend are unique.

11. If your response to Interrogatory 9 is in the negative, what is your basis for contending that a ten mile EPZ is inadequate?
12. Describe in detail the measures which you contend that "local emergency response needs" are required to be taken.
13. What are your bases for your responses to Interrogatories 7 through 12? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
14. What do you mean by "resulting from large population concentrations?"
15. Specify the population concentrations which you contend exist around the Catawba facility to which you refer in Contention 3.
16. What do you mean by "the design of the facility"?
17. What specific aspects of facility design do you contend require an extension of the EPZ beyond the requirements of the regulations?
18. For each of the particular aspects of design identified in response to Interrogatory 17, please describe how those aspects affect the measures Applicants must take in the event of a radiological emergency.

19. Do you contend that those design aspects identified in your response to Interrogatory 17 are unique to the Catawba facility?
20. If your response to Interrogatory 19 is in the affirmative, do you contend that those design aspects require specific measures for emergency planning that other facilities would not need to take?
21. If your response to Interrogatory 20 is in the affirmative, please specify those additional measures.
22. What are the bases for your responses to Interrogatories 14 through 21? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
23. What do you mean by "prevailing meteorology?"
24. What are the specific meteorological conditions which you contend support your position in Contention 3?
25. For each of the meteorological conditions identified in response to Interrogatory 23, specify the particular effect you contend such conditions would have in a radiological emergency.
26. In what way do you contend those conditions are "prevailing?"
27. Are the meteorological conditions specified in response to Interrogatory 24 different from those identified by the Applicants?

28. If your response to Interrogatory 27 is in the affirmative, please specify the differences which you contend exist.
29. What are your bases for your responses to Interrogatories 23 through 28? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
30. In what way do you contend the ten-mile EPZ is "inadequate?"
31. Are there any factors which you contend support your position that the ten-mile EPZ is "inadequate" other than the three cited in your Contention (local emergency response needs, facility design and prevailing meteorology)?
32. If your response to Interrogatory 31 is in the affirmative, please specify those additional factors.
33. What is the "planning basis" which you referenced in your Contention?
34. What are the current NRC regulations which you contend specifies the "planning basis" described in your response to Interrogatory 33?
35. How do you contend that "planning basis" is "inappropriate" for the Catawba facility?

36. How do you contend the "planning basis" is to be applied to a nuclear facility?
37. What aspects of NUREG-0396 do you rely in support of your Contention?
38. What NRC requirements do you contend impose the discussions in NUREG-0396 on the Catawba facility?
39. For each of the aspects of NUREG-0396 identified in your response to Interrogatory 37, please specify the measures which you contend Applicants' emergency response plans should include.
40. What aspects of NUREG/CR-1659 do you contend support your position in Contention 3?
41. What current NRC regulations do you contend require that those aspects of NUREG/CR-1659 be applied to the Catawba facility?
42. For each aspect of NUREG/CR-1659 identified in your response to Interrogatory 40, please specify the measures which you contend Applicants must take in their emergency response plans in response thereto.
43. What are your bases for your responses to Interrogatories 30 through 42? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.

44. What do you mean by "Applicants have not provided reasonable assurance?"
45. What information do you contend the Applicants must show with respect to emergency plans?
46. What information do you contend the state plans must show with respect to emergency planning?
47. What information do you contend the local (county) plans must show with respect to emergency planning?
48. How do you contend the "design of the facility" differs from those considered in NUREG-0396.
49. What are your bases for your answers to Interrogatories 44 through 48? Identify all documents, testimony or oral statement by any person and legal requirements on which you rely in support of your position.
50. What are the "adequate protective measures" which you contend Applicants must take in the event of an emergency?
51. What are the "adequate protective measures" you contend that state officials must take in the event of an emergency?
52. What are the "adequate protective measures" which you contend local (county) officials must take in the event of an emergency?
53. What are your bases for your responses to Interrogatories 50 through 52? Identify all documents, testimony

or oral statements by any person and legal requirements on which you rely in support of your position.

54. Who are the "state emergency preparedness officials" which you contend must be available to respond in the event of an emergency?
55. Who are the local officials whom you contend must be ready to respond in the event of an emergency?
56. Who are the utility officials whom you contend must be ready to respond in the event of an emergency?
57. Do you contend that there are no "state emergency preparedness officials" who would be able to respond in the event of an emergency?
58. Do you contend that there are no "local emergency preparedness officials" who would be ready to respond in the event of an emergency?
59. Do you contend that there are no "utility emergency preparedness officials" who would be ready to respond in the event of an emergency?
60. If your response to Interrogatory 57 is in the affirmative, are you alleging that the state officials identified in the North and South Carolina State emergency plans are not capable of responding in the event of an emergency?
61. If your response to Interrogatory 58 is in the affirmative, are you alleging that appropriate county officials

- are unable to respond in the event of an emergency?
62. If your response to Interrogatory 59 is in the affirmative, are you contending that Applicants' emergency response organization as organized at other Duke facilities is not capable of responding to an emergency at the Catawba facility?
 63. If your responses to any of Interrogatories 60 through 62 are in the affirmative, please specify the substance of your allegations that those officials are not able to respond in the event of an emergency.
 64. If your response to Interrogatories 57 through 59 is in the negative, please specify the substance of your allegations regarding the capabilities of state, local and utility emergency preparedness officials.
 65. What are your bases for your responses to Interrogatories 54 through 64? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
 66. What are the "other entities" which you contend must be available to respond in the event of an emergency?
 67. What are the functions of each of those "entities" which you identified in your response to Interrogatory 66?
 68. Who are the "other persons" whom you contend must be able to respond in the event of an emergency?

69. What are the functions which you contend the persons identified in your response to Interrogatory 68 must perform?
70. Do you contend that there are no "medical facilities" which are available for responding in the event of an emergency?
71. If your response to Interrogatory 70 is in the affirmative, what measures do you contend the Applicants must take to assure adequate medical responses?
72. If your response to Interrogatory 70 is in the negative, what are the medical facilities which you contend are available for responding in the event of an emergency?
73. For each of the medical facilities identified in your response to Interrogatory 72, what are the functions which you contend those facilities would be able to perform?
74. Do you contend that the functions identified in your response to Interrogatory 73 would not be properly performed?
75. If your response to Interrogatory 74 is in the affirmative, please specify the nature of your allegations with respect to those functions.
76. If your response to Interrogatory 74 is in the negative, please state what your exact concern is regarding medical facilities.

77. What are your bases for your responses to Interrogatories 66 through 76? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
78. Do you contend there are no firefighting facilities that would be capable of responding in the event of an emergency?
79. If your response to Interrogatory 78 is in the affirmative, what measure do you contend the Applicants must take to assure that firefighting capability is available?
80. If your response to Interrogatory 78 is in the negative, what are the firefighting facilities which you contend are available?
81. For each of the facilities identified in your response to Interrogatory 80, what are the functions which you contend those facilities are capable of performing?
82. Do you contend that the firefighting facilities are not able to properly perform the functions identified in your response to Interrogatory 81?
83. If your response to Interrogatory 82 is in the affirmative, please specify the substance of your allegations.
84. If your response to Interrogatory 82 is in the negative, please explain exactly the nature of your allegations regarding firefighting capability.

85. What are the bases for your responses to Interrogatories 78 through 84? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
86. Do you contend there are no law enforcement organizations available to respond in the event of an emergency?
87. If your response to Interrogatory 86 is in the affirmative, please specify what measures you contend the Applicants must take to make available adequate law enforcement organizations.
88. If your response to Interrogatory 86 is in the negative, what law enforcement organizations do you contend are available to respond in the event of an emergency?
89. For each of the law enforcement organizations identified in your response to Interrogatory 88, please specify the functions which you believe those organizations should be capable of performing.
90. Do you contend that the law enforcement organizations identified in your response to Interrogatory 88 are not capable of properly responding in the event of an emergency?
91. If your response to Interrogatory 90 is in the affirmative, please specify the particular inadequacies which you contend exist.
92. If your response to Interrogatory 90 is in the negative,

please describe the nature of your allegations regarding law enforcement organizations.

93. What are your bases for your responses to Interrogatories 86 through 92? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
94. What are the "social service agencies" which you contend should be available to respond in the event of an emergency?
95. What are the measures which you contend those "social service agencies" identified in your response to Interrogatory 94 must be capable of taking?
96. Do you contend that there are no "social service agencies" in the vicinity of the plant which are capable of taking the measures identified in your response to Interrogatory 95?
97. If your response to Interrogatory 96 is in the affirmative, what measures do you contend Applicants should take to make such services available?
98. If your response to Interrogatory 96 is in the negative, what are the "social service agencies" which you contend must be considered to respond in an emergency?
99. For each of the agencies identified in your response to Interrogatory 98, what are the functions which you contend each such agency should perform?

100. Do you contend that the agencies identified in your response to Interrogatory 98 are not able to adequately perform the functions listed in your response to Interrogatory 99?
101. If your response to Interrogatory 100 is in the affirmative, specify the nature of your contention that those organizations will not be able to properly respond.
102. If your response to Interrogatory 100 is in the negative, please specify the substance of contention with respect to "social service agencies."
103. What are your bases for your responses to Interrogatories 94 through 102? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
104. What are the "specific criteria" set forth in NUREG-0654, Rev. 1 on which you rely in support of your Contention?
105. For each of the criteria identified in your response to Interrogatory 104, specify the substance of your objection.
106. Do you contend that the emergency response plans for the Catawba facility will not provide adequate measures with respect to Rock Hill, South Carolina?
107. If your response to Interrogatory 106 is in the affirmative, please specify the substance of your objection.

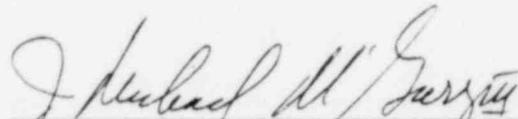
108. Do you contend that the emergency response plans for the Catawba facility will not provide for responses with respect to Gastonia, North Carolina as required by applicable NRC requirements?
109. If your response to Interrogatory 108 is in the affirmative, please specify the nature of your allegations with respect to emergency planning for Gastonia, North Carolina.
110. Do you contend that adequate emergency response plans will be prepared with respect to Charlotte, North Carolina?
111. If your response to Interrogatory 110 is in the affirmative, please specify the nature of your allegations with respect to emergency planning for Charlotte, North Carolina.
112. Please describe how you calculate transient populations in excess of 60,000 persons on a peak day.
113. For your response to Interrogatory 112, specify the geographical area which you employ in reaching the figure.
114. How many persons do you contend gather at Heritage, U.S.A. on the average and on a peak day basis?
115. How many persons do you contend use the facilities of the PTL Club on an average daily basis and on a peak day?

116. What do you contend state and local emergency preparedness plans must provide to "protect people living within either the plume exposure or ingestion pathway EPZs?"
117. What are your bases for your responses to Interrogatories 104 through 116? Identify all documents, testimony or oral statements of any person and legal requirements on which you rely in support of your position.
118. On what do you base your allegation that "Applicants have no intention of conducting the 'full-scale exercise,' called for by 10 CFR Part 50, App. E(f)(1), but only well-rehearsed drills involving no significant movement of population"?
119. What do you contend a "full-scale exercise" must entail which Applicants do not intend to include within their exercise?
120. What emergency planning measures to you contend must be taken with respect to Rock Hill, South Carolina, in addition to those specified in your response to Interrogatory 107 (if any)?
121. What additional emergency planning measures do you contend Applicants must take with respect to Charlotte, North Carolina, besides those listed in your response to Interrogatory 111 (if any)?

122. What are your bases for your responses to Interrogatories 118 through 121? Identify all documents, testimony or oral statements by any person and legal requirements on which you rely in support of your position.
123. Have you familiarized yourself with the NRC regulations regarding emergency plans?
124. Have you familiarized yourself with NRC regulatory guides and guidance documents regarding emergency plans?
125. Have you familiarized yourself with the State Emergency plan already in existence for North and South Carolina?
126. Have you familiarized yourself with the off-site emergency plans developed for response to emergencies at nuclear power plants such as Duke Power Company's McGuire Nuclear Station or South Carolina Electric & Gas' Summer Nuclear Station?
127. If your response to Interrogatories 123 through 126 is affirmative, in whole or in part, have you factored that information into your responses to these interrogatories? If not, why not?

128. If your response to Interrogatories 123 through 126 is affirmative, in whole or in part, have you revised your emergency plan contentions to take this information into account? If not, why not?

Respectfully submitted,



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