

4/28/1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

| | | |
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| In the Matter of |) | |
| UNITED STATES DEPARTMENT OF ENERGY |) | Docket No. 50-537 |
| PROJECT MANAGER CORPORATION |) | |
| TENNESSEE VALLEY AUTHORITY |) | |
| (Clinch River Breeder Reactor |) | |
| Plant) |) | |

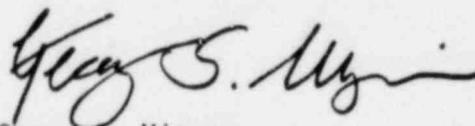
NRC STAFF UPDATED ANSWERS TO
STATE OF TENNESSEE INTERROGATORIES

The NRC Staff ("Staff") hereby updates its October 18, 1976 Response to the State of Tennessee's Interrogatories filed on June 7, 1976. At the time that discovery was conducted between the State of Tennessee ("State") and the Staff, the State was participating as an Intervenor pursuant to 10 C.F.R. § 2.714. On March 29, 1982, the State filed a motion to withdraw as a party under § 2.714, while continuing to participate in this proceeding as an interested state, pursuant to 10 C.F.R. § 2.715. The State's motion was granted by the Atomic Safety and Licensing Board (Licensing Board) in its March 31, 1982 Order (Status of State of Tennessee). The Staff believes that it is not required, pursuant to 10 C.F.R. § 2.740(b) and the Licensing Board's Prehearing Conference Order of February 11, 1982, to provide updates to its June 7, 1976 Response to the State's Interrogatories, because an interested state is not entitled to participate in the hearing process as a full-fledged party. 10 C.F.R. § 2.715. Nonetheless the Staff updates its Response,

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in order to expedite the hearing process. The Staff's updating of its June 7, 1976 Response should not be construed as an admission that the State is entitled to participate in this proceeding with the full panoply of rights accorded by 10 C.F.R. § 2.714. Attached hereto are the Staff's updated answers to the State's Interrogatories, together with the affidavit of Michael Kaltman.^{1/}

Respectfully submitted,



Geary S. Mizuno
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 28th day of April, 1982

^{1/} The affidavit of Mr. Kaltman is unsigned. However, a copy of his signed, notarized affidavit will be filed shortly.

NRC STAFF'S UPDATED ANSWERS TO
THE STATE OF TENNESSEE INTERROGATORIES

The Staff responses to interrogatory No. 29 is applicable to interrogatories 1 through 27.

Interrogatory 1

Describe in detail the methodology employed by the Staff to determine that multipliers of .75 and .50 should be used to calculate induced personnel during construction of the CRBRP. (DES 4.1; p. 4-1).

Answer 1

The Staff did not conduct any independent analysis of secondary employment multipliers. An Appalachian Regional Commission had already determined values for Anderson and Roane Counties. In addition, a U.S. Chamber of Commerce study found that 68 additional people were employed in non-manufacturing jobs for every 100 new factor workers in a town.

The Applicant concluded that the Chamber of Commerce's findings more accurately reflected the temporary effects of the non-permanent work force than the Commission's findings. In the judgement of the Staff, there is a time lag for a secondary work force to reach an equilibrium value under circumstances involving permanent employment; secondary employment may not reach an equilibrium value to support a temporary work force. Thus, the appropriate multipliers for the construction labor force must be something less than 0.68 (equilibrium value in the Chamber of Commerce study) but something greater than zero. The Staff agrees that the selected value of 0.6 is a reasonable estimate for the purposes of the impact analysis.

Interrogatory 2

Describe in detail the methodology employed by the Staff to determine the availability and capability of solid waste disposal sites sufficient to receive the solid waste generated through construction of the plant and the influx of construction workers into the impact area (DES 4.2.1; p. 4-2).

Answer 2

The Staff's assessment of solid waste disposal sites consisted of a review of the Applicant's data provided in Sections 8.1.3.3.3 and 8.3.2.1 of Amendment X to the ER. These data were developed from a series of interviews with knowledgeable government officials. A Staff study would have included interviews with these same officials. Moreover, the methodology employed by the Staff considers the comprehensiveness of treatment, the timeliness of data, and the acceptability of analytical methods and assumptions based on state-of-the-art practice and professional judgment. In these respects the treatment of solid wastes issues met the Staff's reasonableness test and no independent study was considered necessary.

Interrogatory 3

Has the Staff attempted to analyze the effect of additional solid waste created by the construction of the facility, the construction workers, and induced personnel on the life of solid waste disposal sites used by municipal and county governments in the projected area? (DES 4.2.1; p. 4-2).

Answer 3

See Staff answer to Interrogatory 2.

Interrogatory 4

Describe in detail the methodology employed by the Staff to determine that the impact area for the CRBRP will be limited to Anderson, Roane, Loudon and Knox counties. (DES 4.5.1; p. 4-4).

Answer 4

The Staff assessment of the four counties as the impact area consisted of a review of materials in the FES (Sec. 4.5.2), Sections 8.1.1.1. and 8.1.1.2 of Amendment X, and the following NRC study: Migration and Residential Location of Workers at Nuclear Power Plant Construction Sites, NUREG/CR-2002. The Staff evaluated the consistency of the Applicant's impact area with conclusions reached in the NRC study which looked at a number of construction sites across the nation. The impact area was designated to bound the limits of the most intense concentration of socioeconomic impacts; the revised Staff analysis does not -- and should not -- imply that all socioeconomic impacts will occur within this defined area. Other socioeconomic impacts can be expected in other areas outside the impact area, but these will be minor.

Interrogatory 5

Describe in detail the methodology employed by the Staff to determine the impact of construction of the CRBRP on waste treatment, water supply, health care and recreation in the impact area. (DES 4.5.1; p. 4-4).

Answer 5

The Staff evaluated the Applicant's data on these topics which are contained in Sections 8.1.3.3, 8.1.3.4, 8.1.3.6, 8.3.2.1.5, 2.3.2.5, and

2.6 of Amendment X. See Staff answer to Interrogatory 2 for sources of data and reason for not conducting a study.

Interrogatory 6

Describe in detail the methodology employed by the Staff to determine how construction and induced movers will be distributed within each county within the impact area. (DES 4.5.1; p. 4-4).

Answer 6

The Staff evaluated the Applicant's material on the distribution of in-moving construction workers to counties which is contained in Sections 8.1.1. and 8.1.3. These data are based on publicly available data sources, interviews with community officials, and assessments of road access, local taxing practices, ordinances restraining or permitting growth, probably availability of housing, and both public sector and private sector services provided by various communities. The Staff considered these qualitative factors, studies of in-moving construction labor, and its professional judgment to arrive at a conclusion which agrees with the Applicant's assessment.

Interrogatory 7

Describe in detail the methodology employed by the Staff to determine the availability of classroom space with respect to distribution of mover children, by grade and school during construction of the CRBRP. (DES 4.5.1; p. 4-5).

Answer 7

The Staff evaluated the Applicant's data on school systems which is contained in Sections 8.1.3.2, 8.3.2.1.1 and 2.2 of Amendment X. The

sources of data and the reasons for not conducting a study are the same as those cited in the Staff answer to Interrogatory 2.

Interrogatory 8

Describe in detail the methodology employed by the Staff to determine the need for additional school bus transportation during construction of the CRBRP. (DES 4.5.1; p. 4-5-7).

Answer 8

The Staff did not perform a study to determine the need for additional school bus transportation during construction of the CRBRP. It was the judgment of the Staff that as such a need arose, it could be met with less lead time and prior planning than, say, capital facilities construction.

The Staff does not intend to conduct such a study but may require the Applicant to monitor school district growths, capacities, enrollments, and needs during construction so that problems such as school bus transportation may be called to attention in a timely fashion.

Interrogatory 9

Describe in detail the methodology employed by the Staff to determine the effects of mover children on school space and services such as cafeteria, library, counseling and similar services during construction of the CRBRP (DES 4.5.1; p. 4-5-7).

Answer 9

This response to this interrogatory is included in the response to Interrogatory 7.

Interrogatory 10

If not already provided in the answer to another Interrogatory, describe in detail the methodology employed by the Staff to determine where construction workers will locate within Knoxville/Knox County during construction of the CRBRP. (DES 4.5.1; p. 4-7).

Answer 10

The Staff did not attempt to forecast the neighborhood location of in-movers to Knoxville. In the judgment of the Staff it was sufficient to reach the conclusion, based on the methodologies described in response to Interrogatory 6, that a number of CRBRP construction workers are expected to commute from Knoxville. Some of these are probably currently residents and some will be in-movers.

The Staff has no plans for conducting a detailed study to predict the location by neighborhood of in-moving CRBRP construction workers to Knoxville.

Interrogatory 11

Describe in detail the methodology employed by the Staff to determine the distribution and impacts of school-aged dependents of induced or secondary movers on local school systems during construction of the CRBRP. (DES 4.5.1; p. 4-5-7).

Answer 11

The Staff assumed that the vast majority of people filling induced or secondary positions would be local residents who were unemployed or were entering the labor force. In addition, some percentage of these jobs would be filled by spouses of in-moving construction workers. Therefore, induced or secondary employment will not impose an impact on local schools beyond that which has already been considered.

Interrogatory 12

Describe in detail the methodology employed by the Staff to determine the location and availability of potable water in the impact area during the construction of the CRBRP. (DES 4.5; p. 4-4-7).

Answer 12

See Staff response to Interrogatory 5.

Interrogatory 13

Describe in detail any attempts by the Staff to determine and show the correlation between the location and availability of potable water and waste treatment capacity and distribution of mobile homes for movers. (DES 4.5; p. 4-4-7).

Answer 13

The Staff did not discuss in the DES the correlation between the location and availability of potable water and waste treatment capacity and distribution of mobile homes for movers. In the opinion of the Applicant, new residential development will tend to cluster in areas currently serviced by these utilities or on the fringes of these areas where extensions of service lines might be feasible. Outside of the utility service area, a new residence would require a well and a septic tank. While it is feasible to do this, the density of new dwellings would probably be limited in this portion of Tennessee by the limited drainage capacity of the soil. The Staff agrees with this position based on experience at other construction sites.

Interrogatory 14

Describe in detail any analysis which the Staff has employed concerning the availability of mobile home parks, apartment units, single

family dwellings, duplex housing units and vacancies thereof in the CRBRP impact area. (DES 4.5).

Answer 14

The Staff did not perform an independent analysis combining the availability of mobile home parks, apartment units, single family dwellings, duplex housing units and vacancies thereof. The Staff reviewed the data on this topic submitted in Amendment X and concluded that lack of housing would not be a serious problem. The market responds rapidly to demands for temporary housing (mobile home parks, rooming houses, etc.) so the Staff concluded that any existing shortages could quickly be alleviated.

The Staff does not intend to perform any further analysis of this subject, but recommends that housing data, including vacancy rates be included as part of a continuing socioeconomic monitoring program on the part of the Applicant.

Interrogatory 15

Describe in detail the methodology employed by the Staff to determine mover impact on health facilities and the availability of health services in the impact area. (DES 4.5).

Answer 15

The Staff evaluated the Applicant's data on health care which are contained in Sections 8.1.3.4, 8.3.2.1.5 and 2.3 of Amendment X. The sources of data and the reason for not conducting a Staff study are those cited in response to Interrogatory 2.

Interrogatory 16

Describe in detail any analysis employed by the Staff to determine the distribution and impact of local sales tax collections on local governments during construction of the CRBRP. (DES 4.5.2; p. 4-7).

Answer 16

The Staff evaluated the Applicant's data on local sales taxes which are contained in Sections 8.2.2.3, 8.3.2.1.4, and 3.0 of Amendment X. It should be noted that all data and assumptions in the Applicant's analysis are explained in Section 3.0. The sources of data and reasons for not conducting an analysis are the same as those indicated in response to Interrogatory 2.

Interrogatory 17

Describe in detail any analysis employed by the Staff to determine the financial impact on local governments resulting from taxes paid by project workers for gasoline, beer, cigarettes and liquor during construction of the CRBRP. (DES 4.5.2; p. 4-7).

Answer 17

See Staff response to Interrogatory 16.

Interrogatory 18

Describe in detail any analysis employed by the Staff to determine that income from all taxes which are returned to local general purpose governments will not, "be equal to the cost of public services which must be provided by the communities" during construction of the CRBRP. (DES 1.5.2; p. 4-7).

Answer 18

This Interrogatory is no longer appropriate because the Staff does not make such a statement in the Final Environmental Statement.

Interrogatory 19

Describe in detail the methodology employed by the Staff to determine the amount and location of impacts caused by traffic during construction of the CRBRP. (DES 4.5; p. 4-4).

Answer 19

The Staff evaluated the Applicant's analysis of traffic impacts which is contained in Sections 8.3.2.1.3 and 2.7 of Amendment X. The sources of data and reason for not conducting a study are those cited in response to Interrogatory 2.

Interrogatory 20

Describe in detail any analysis employed by the Staff concerning the number and size of trucks using "established routes" and the impacts of said trucks on the carrying capacity of those routes. (DES 4.6.1; p. 4-9).

Answer 20

The Staff does not have any studies or analyses of truck traffic. Rather, the Staff accepts the Applicant's commitment as reasonable because trucks are an important factor in traffic congestion, roadway wear, and in creating noise and dirt.

Interrogatory 21

Describe in detail any analysis employed by the Staff to determine the impact of anticipated truck traffic on the maintenance schedules of the "established routes". (DES 4.6.1; p. 4-9).

Answer 21

The Staff made no review of truck traffic in relation to highway maintenance.

Interrogatory 22

Describe in detail any analysis undertaken by the Staff to determine the advisability of using satellite parking, vans, carpools or buses in the transportation of construction workers during the construction of the CRBRP. (DES 4.6.2; p. 4-10).

Answer 22

The Staff reviewed the Applicant's data on traffic which did not consider sponsored van or bus programs. By not considering such programs, the Applicant's analysis overstates the impacts which the Staff does not consider disruptive.

Interrogatory 23

Describe in detail any analysis undertaken by the Staff to determine possible distribution of in-lieu-of tax payments to the counties in the impact area during construction of the CRBRP. (DES 4.6.2; p. 4-10).

Answer 23

The Staff did not undertake an analysis of in-lieu-of tax payments to individual counties. The distribution of ERDA in-lieu-of tax payments to the counties in the impact area is a matter of law and not of judgment. It is the understanding of the Staff that the law only permits such payments to the counties of Roane and Anderson and the City of Oak Ridge. Payments to other local government jurisdictions would not be possible without additional legislative action. It should be noted that the Applicant's analysis omits consideration of these payments and, as a result, presents a conservative analysis of fiscal impacts.

Interrogatory 24

Describe in detail any analysis undertaken by the Staff to determine the ability of the Oak Ridge Hospital to handle additional patients associated with the CRBRP. (DES 4.5).

Answer 24

See Staff response to Interrogatory 15.

Interrogatory 25

Describe in detail any analysis undertaken by the Staff to determine the adequacy of emergency medical services in the project area in light of the additional load caused by CRBRP personnel. (DES 4.5).

Answer 25

The Staff noted that the Applicant plans to arrange for emergency medical services with local hospitals and attending physicians for care of CRBRP construction workers (PSAR Section 13.3). The Staff did not determine the adequacy of this arrangement because it was not considered to be an issue in the environmental review.

Interrogatory 26

Describe in detail any analysis undertaken by the Staff to determine the adequacy of law enforcement services within the CRBRP impact area. (DES 4.5).

Answer 26

The Staff evaluated the Applicant's discussion of law enforcement services and impacts which is contained in Sections 8.1.3.5.1, 8.3.2.1.5, and 2.4 of Amendment X. The sources of data and reasons for not

undertaking an independent analysis are cited in response to Interrogatory 2.

Interrogatory 27

Describe in detail any analysis undertaken by the Staff to determine the remaining bonding capacity of the various municipalities and counties in the impact area. (DES 4.5).

Answer 27

Bonding capacity was not a topic analyzed because neither the Applicant nor the Staff saw a need for capital facilities.

Interrogatory 28

Describe in detail any analysis undertaken by the Staff to determine the existence of laws, regulations or ordinances which might affect the distribution of construction movers in the impact area during construction of CRBRP.

Answer 28

The Staff asked the Applicant to describe the planning institutions in the four-county area in terms of (a) the control of land use decisions and zoning; (b) special purpose ordinances, e.g., mobile homes, farm-land preservation, floodplains; and (c) comprehensive plans and planning.

The Applicant's response which is based on interviews with local planners is reported as response to Question 10, dated January 22, 1982.

Interrogatory 29

If the Staff has responded to any of the previous Interrogatories number 1-28, by stating that no such study has been made of the topic involved in that request, state the following:

- A. With respect to each such response, describe in detail the Staff's reason for not performing a study on that topic.
- B. With respect to each such response, state whether the Staff intends to conduct a study on that topic.
- C. With respect to each such response, identify the individuals involved and the documents relating to a decision to not conduct a study.

Answer 29

In all of the above responses where the answer was that no studies or analyses were conducted, refer to Staff's response to Interrogatory 2 for the reasons.

- B. The Staff has no plans for conducting a detailed study of the issue.
- C. The decision to not conduct a study was the responsibility of the NRC Staff.

Interrogatory 30

Describe in detail any efforts undertaken by the Staff to determine whether the Applicant will employ local health service personnel such as doctors and nurses to provide medical services to construction workers of CRBRP project.

Answer 30

The Staff noted that the Applicant plans to arrange for emergency medical services with local hospitals and attending physicians for care of CRBRP construction workers (PSAR Section 13.3). No other efforts were undertaken by the Staff to determine whether the Applicant would employ local health service personnel to provide medical services to construction workers of the CRBRP.

Interrogatory 31

Has the Staff arrived at a specific formula to determine the amount of money to be made available to various local governments to mitigate specific socioeconomic impacts? If so, state the formula. If not, describe in detail any quantitative approach by which the Staff has determined the amount of funds to be applied in each case. If no such quantitative approach has been undertaken by the Staff, describe in detail any commitments which the Staff will require of the Applicant with regard to mitigations of these socio-economic impacts.

Answer 31

The Staff has not arrived at a specific formula to determine the amount of money to be made available to various local governments to mitigate specific socioeconomic impacts. Neither has the Staff used any quantitative approach to determine the amount of funds to be applied in each case.

The Staff cannot impose any requirements on the Applicant with regards to mitigation of impacts but can only recommend such measures to the ASLB. The Staff will recommend that the Applicant establish a monitoring program to determine the degree of project related socioeconomic impacts. If, based on these measurements, the Applicant and the affected communities can agree on the amount of financial assistance to be provided by the Applicant, the Staff would consider it a moot point after that.

Interrogatory 32

With respect to the authorized person executing the answers to these Interrogatories on behalf of the Staff, give the following information: (a) your name, (b) business and resident address, (c) educational background, (d) work experience, and (e) list those Interrogatories that you answered from personal knowledge.

Answer 32

All Interrogatories were answered by Michael Kaltman whose affidavit is attached.

interrogatory 33

With respect to the Interrogatories which were not answered by the person executing the answers from personal knowledge, please list the persons contributing to the answers of each Interrogatory, from personal knowledge or information, their business and resident address, educational background, and work experience.

Answer 33

N/A

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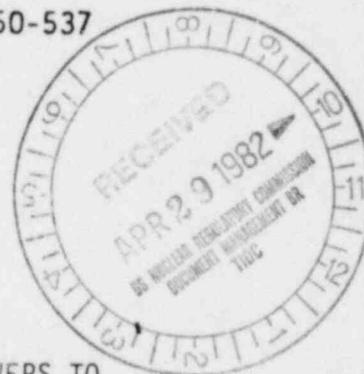
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In the Matter of

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PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor
Plant)

Docket No. 50-537



CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB SECOND SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF", "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB REQUEST TO APPLICANTS AND STAFF FOR ADMISSIONS DATED SEPTEMBER 16, 1976", "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB EIGHTEENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF AND THIRTEENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF AND THIRTEENTH SET OF INTERROGATORIES TO APPLICANTS", "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB REQUEST TO APPLICANTS AND STAFF FOR ADMISSIONS DATED SEPTEMBER 16, 1976", "NRC STAFF UPDATED ANSWERS TO STATE OF TENNESSEE INTERROGATORIES", "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB REQUEST TO APPLICANTS AND STAFF FOR ADMISSIONS DATED AUGUST 13, 1976", "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB REQUEST TO APPLICANTS AND STAFF FOR ADMISSIONS DATED SEPTEMBER 30, 1976" in the above-captioned proceeding and have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, either through deposit in the Nuclear Regulatory Commission's internal mail system or hand delivered, this 28th day of April, 1982:

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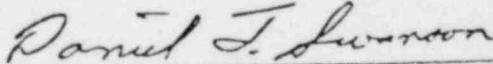
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