

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor
Plant)

Docket No. 50-537

NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE
COUNCIL, INC., AND THE SIERRA CLUB TENTH SET OF
INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF

Pursuant to the Licensing Board's Prehearing Conference Order of February 11, 1982, the Nuclear Regulatory Commission Staff (Staff) hereby updates its June 18, 1976 and August 10, 1976 responses to Intervenor's Natural Resources Defense Council, Inc. and the Sierra Club Tenth Set of Interrogatories to the Nuclear Regulatory Commission filed on May 13, 1976. Attached hereto are the Staff's answers to NRDC's and the Sierra Club's interrogatories, together with the affidavits of Mr. Erickson and Mr. Nehemias who provided the answers.^{1/}

On March 4, 1982, the parties in this proceeding developed a Protocol for Discovery. NRDC has requested that answers to interrogatory questions be provided in six parts. The following six parts are:

A) Provide the direct answer to the question.

^{1/} The affidavits of Mr. Erickson and Mr. Nehemias are unsigned. However, a copy of their signed, notarized affidavit will be filed shortly.

- B) Identify all documents and studies, and the particular parts thereof, relied upon by the Staff, now or in the past, which serve as the basis for the answer. In lieu thereof, at Staff's option, a copy of such document and study may be attached to the answer.
- C) Identify principal documents and studies, and the particular parts thereof, specifically examined but not cited in (b). In lieu thereof, at Staff's option a copy of each such document and study may be attached to the answer.
- D) Identify by name, title and affiliation the primary Staff employee(s) or consultant(s) who provided the answer to the question.
- E) Explain whether the Staff is presently engaged in or intends to engage in any further, ongoing research program which may affect the Staff's answer. This answer need be provided only in cases where the Staff intends to rely upon ongoing research not included in Section 1.5 of the PSAR at the LWA or construction permit hearing on the CRBR. Failure to provide such an answer means that the Staff does not intend to rely upon the existence of any such research at the LWA or construction permit hearing on the CRBR.
- F) Identify the expert(s), if any, which the Staff intends to have testify on the subject matter questioned, and state the qualifications of each such expert. This answer may be provided for each separate question or for a group of related questions. This answer need not be provided until the Staff has in fact identified the expert(s) in question or determined that no expert will testify, as long as such answer provides reasonable notice to Intervenors.

For all the responses to interrogatories in this set the following are the answers to the requested parts in the Protocol for Discovery.

- B) All documents and studies, and the particular parts thereof, relied upon by the Staff now or in the past which serve as the basis for the answer are mentioned in the direct answer to the question unless otherwise noted.

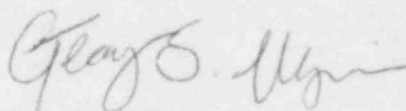
- C) There were no principal documents and studies specifically examined but not cited in (b) unless otherwise noted.
- D) The name, title and affiliation of the Staff employee(s) or consultant(s) who provided the answer to the question are available in the affidavits.
- E) The Staff is not presently engaged in nor intends to engage in any further, on-going research program which may affect the Staff's answer unless otherwise noted.
- F) At this time, the Staff has not determined who will testify on the subject matter questioned. Reasonable notice will be given to all parties after the Staff has made this determination. At that time, a statement of professional qualifications will be provided for each witness.

In the April 14, 1982 Order Following Conference With Parties, the Licensing Board renumbered NRDC's contentions. When an old contention number appears in the interrogatory question or answer, the new contention number will be indicated in parentheses.

Respectfully submitted,



Daniel T. Swanson
Counsel for NRC Staff



Geary S. Mizuno
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 27 day of April, 1982

NRC STAFF'S ANSWERS TO NRDC'S AND
THE SIERRA CLUB'S INTERROGATORIES

The NRC Staff has determined that previous responses to interrogatories I., #1 and #2; II. #1 and #2; III, #1 through #8 and in the section entitled "The following interrogatories are related to Contention 14" #2 and #3 are still applicable and need no updating. In interrogatory #2 pertaining to Contention 14 (renumbered as 8), .2 mrem/kw should be .2 mrem/hour.

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AFFIDAVIT OF JOHN V. NEHEMIAS

I, John V. Nehemias, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Senior Health Physicist, Radiological Assessment Branch, Division of Systems Integration, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 and #2 of Section I; #1 and #2 of Section II and #1 through #8 of Section III of the 10th Set and I hereby certify that the answers given are true to the best of my knowledge.

John V. Nehemias

Subscribed and sworn to before me
this day of April, 1982.

Notary Public

My Commission expires:

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AFFIDAVIT OF PETER B. ERICKSON

I, Peter B. Erickson, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Project Manager, Standardization and Special Projects Branch, Division of Licensing, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #2 and #3 pertaining to Contention 14 (renumbered as 8) of the 10th Set and I hereby certify that the answers given are true to the best of my knowledge.

Peter B. Erickson

Subscribed and sworn to before me
this day of April, 1982.

Notary Public

My Commission expires: