



4/29/82

DOCKETED  
USNR

UNITED STATES

NUCLEAR REGULATORY COMMISSION

In the Matter of

UNITED STATES DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY

(Clinch River Breeder Reactor  
Plant)

Docket No. 50-537

APPLICANTS' UPDATED  
RESPONSE TO INTERVENORS',  
NATURAL RESOURCES DEFENSE COUNCIL, INC.  
AND SIERRA CLUB, TENTH SET  
OF INTERROGATORIES TO THE APPLICANTS

Pursuant to 10 CFR § 2.740b., and in accordance with the Board's Prehearing Conference Order of February 11, 1982, the United States Department of Energy, Project Management Corporation, and the Tennessee Valley Authority (the Applicants), hereby file their updated responses to Intervenor's', Natural Resources Defense Council, Inc., and the Sierra Club, Tenth Set of Interrogatories to the Applicants, dated August 13, 1976.<sup>\*/</sup>

<sup>\*/</sup> Applicants previously responded to these interrogatories on March 16, 1977. Applicants have prepared these updated responses to establish a current base of information for the CRBRP for the purpose of expediting these proceedings. Accordingly, in providing these responses, Applicants do not concede that the information contained therein admissible in or necessary to a  
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Answers to General Questions (a) - (f)

(a) Provide the direct answer to the question.

ANSWER: See the direct answers below under heading "ANSWER".

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

ANSWER: See the direct answers below under heading "DOCUMENTS".

(c) Identify principal documents and studies, and the particular parts thereof, specifically examined but not cited in (b). In lieu thereof, at Applicants' option, a copy of each such document and study may be attached to the answer.

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decision in the LWA proceeding. Applicants have not furnished copies of or made available for inspection and copying those documents referenced in this response which were previously referenced and made available pursuant to the Applicants' previous responses. Documents referenced for the first time in this updated response will be made available upon request. General questions and responses follow the protocol agreed upon by the parties and attached to Mr. Greenberg's March 8, 1982 letter to Counsel for PMC.

ANSWER: Unless otherwise indicated below in regard to the answer under the heading "DOCUMENTS"; none.

- (d) Identify by name, title and affiliation the primary Applicant employee(s) or consultant(s) who provided the answer to the question.

ANSWER: See the attached affidavits.

- (e) Explain whether Applicants are presently engaged in or intend to engage in any further, ongoing research program which may affect Applicants' answer. This answer need be provided only in cases where Applicants intend 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 Applicants do not intend to rely upon the existence of any such research at the LWA or construction permit hearing on the CRBR.

ANSWER: If not in Section 1.5 of the PSAR and the direct answer below; none.

- (f) Identify the expert(s) if any, which Applicants intend 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 Applicants have in fact identified the expert(s) in question or determined that no expert will testify, as long as such answer provides reasonable notice to Intervenor.

ANSWER: Applicants have not yet identified the expert(s) in question.

Answers to Specific Questions

Interrogatory.

V9. What is meant by the phrase:

The best interest of the public is served by the Clinch River Breeder Reactor Plant as a demonstration plant to show the safety, economic and environmental advantages of the LMFBR technology

on page 3 of the letter.

Answer.

The complete sentence referred to in this question from the July 14, 1976, letter from L. W. Caffey to R. Boyd reads as follows:

"It is the Project's concern that the imposition of unrealistic assessments could lead to design modifications that

are not in the best interest of the public as served by the Clinch River Breeder Reactor Plant as a demonstration plant to show the safety, economic, and environmental advantages of the LMFBR technology."

When read in context with the rest of this sentence and the preceding three sentences in which the Applicants indicated that the technical bases for a 1200Mw energetic event are not fully understood, it becomes apparent that in this passage the Applicants are suggesting that NRC's analytical techniques and assumptions regarding such a disruptive event are unduly conservative and should be revised to reflect a more reasonable estimate of the energetics associated with such a disruptive event. Imposition of unrealistic assessments leading to additional unnecessary design requirements or design features results in no real increase in overall plant safety while at the same time adds to the cost and complexity of the CRBRP. Since there would be no increase in the overall protection afforded to the public health and safety or enhancement of the environment associated with these design features, the addition of cost and complexity would be inconsistent with the demonstration objectives of CRBRP. If these design features were to be imposed, the Applicants believe, therefore, that the best interest of the public would not be served.

Interrogatory.

V 10. Describe in detail why the CRBR would not serve the demonstration function if its design were overly conservative.

Answer.

As stated in No. 9., the use of unrealistic assessments which lead to no real increase in overall plant safety adds cost and complexity without a compensating benefit. Therefore, addition of features or requirements which have no real safety advantage might impede the demonstration objectives of the CRBRP.



In the matter of ,)  
Department of Energy ,)  
PROJECT MANAGEMENT CORPORATION and,)  
TENNESSEE VALLEY AUTHORITY ,)

PATRICIA G. CILIMBERG  
NOTARY PUBLIC STATE OF MARYLAND  
My Commission Expires July 1, 1992

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of  
UNITED STATES DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY  
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

CERTIFICATE OF SERVICE

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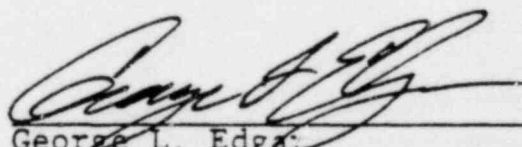
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DATED: April 29, 1982

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