

4/29/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

U.S. 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
THIRD 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 January 28, 1976, April 7, 1976, June 16, 1976, November 19, 1976 and December 1, 1976 response to Intervenors' Natural Resources Defense Council Inc. and the Sierra Club Third Set of Interrogatories to the Nuclear Regulatory Commission Staff filed on December 31, 1975. Attached hereto are the Staff's answers to NRDC's and the Sierra Club's interrogatories, together with the affidavit of Mr. Howard B. Holz. 1/

Respectfully submitted,

Daniel T. Swanson

Daniel T. Swanson
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 29th day of April, 1982

1/ The affidavit of Mr. Holz is unsigned. However, a copy of his signed and notarized affidavit will be filed shortly.

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

For the interrogatories in Sections I and II, the NRC Staff defers updating these questions until after the CP SER because the Staff has not yet selected the computer codes and other tools it will use in its audit and evaluation. In my view, these questions involve aspects of Contentions 1, 2, and 3 which were deferred by the Board during its April 20, 1982 prehearing conference.

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AFFIDAVIT OF HOWARD B. HOLZ

I, Howard B. Holz, being duly sworn, state as follows:

1. I am employed by the U.S. Nuclear Regulatory Commission as a Systems Engineer, Clinch River Breeder Reactor Program Office, Office of Nuclear Reactor Regulation.
2. I am duly authorized to participate in answering Interrogatories #1 through #15 of Section I and #1 through #30 of Section II of the 3rd Set and I hereby certify that the answers given are true to the best of my knowledge.

Howard B. Holz

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

Notary Public

My Commission expires: