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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANSON

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
UNION ELECTRIC COMPANY ) Docket No. STN 50-483 OL  
(Callaway Plant, Unit 1) )

ANSWERS TO INTERROGATORIES  
OF JOHN G. REED (FIRST SET)

Comes now the Missouri Public Service Commission (PSC) by and through the Office of General Counsel (General Counsel), and hereby submits the following responses to John Reed's Interrogatories and Requests for Production of Documents (Set No. 1) to the Missouri Public Service Commission and the State of Missouri (INTERROGATORIES).

INTRODUCTION

That on or about June 17, 1982, the PSC received interrogatories from Mr. John Reed. That the "State of Missouri" (State) and the Missouri Public Service Commission (PSC) was directed by the terms of the heading under the case caption of these INTERROGATORIES to answer said INTERROGATORIES, however each individual interrogatory refers to the "State of Missouri" only.

That the PSC is a non-party participant under 10 CFR 2.715(c). That under 10 CFR 2.740(b), interrogatories may be served only upon parties.

That, in 1979, the PSC petitioned the Atomic Safety and Licensing

Board for leave to intervene in the above-captioned proceeding as "an interested agency" of the State of Missouri pursuant to 10 CFR Section 2.175(c). The PSC is empowered to regulate investor-owned public utilities that serve customers in the State of Missouri pursuant to the authority granted to it by the General Assembly of the State of Missouri in Chapters 386 through and including 393, Revised Statutes of Missouri 1978. Union Electric (Applicant) is an operating utility engaged in the business of furnishing electric service in Eastern Missouri, and thus, is subject to the jurisdiction of the PSC. The PSC has specific regulatory authority over Callaway 1 (See Section 386.250(5) and 393.130, RSMo 1978). Anticipating the eventual inclusion of Callaway Unit 1 into Applicant's rate base, the PSC is monitoring the construction costs of Callaway, pursuant to the PSC's broad statutory authority to approve rates.

The PSC submits it is not the State and cannot and does not act for or represent the State in these proceedings. 10 CFR Section 2.715(c) states:

The presiding officer will afford representatives of an interested State, County, municipality, and /or agencies thereof, a reasonable opportunity to participate and to introduce evidence, interrogate witnesses, and advise the Commission without requiring the representative to take a position with respect to the issue. (emphasis added)

The PSC intervened in the above-captioned proceeding as a representative of a State agency, all in accordance with the NRC's Rules. The PSC does not now maintain, nor has it ever maintained, that it is a representative of the State. Consequently, the PSC has no authority to compel the State or other State agencies to answer said INTERROGATORIES.

Nevertheless, in the spirit of cooperation and so as to not delay

or hinder an expeditious hearing of Mr. Reed's Contentions in the above-captioned proceeding, the PSC will make a good faith effort to answer those interrogatories in Mr. Reed's Set No. 1 that are within its jurisdiction and authority, so long as said interrogatories are not objectionable.

Further, it is the PSC's understanding that Disaster Planning and Operations Office (DPOO), and the Bureau of Radiological Health (BRH), have voluntarily agreed to cooperate with Mr. Reed in responding to his interrogatories relating to "emergency planning". DPOO and BRH are Missouri's lead agencies in disaster planning and emergency preparedness. Any objections or answers to INTERROGATORIES propounded by the PSC are solely its own and are not intended to reflect the objections, if any, that DPOO, BRH or any other agency, representative or entity of the State of Missouri may wish to raise.

INTERROGATORY NO. 1. Produce any and all documents, correspondence, or memoranda between the State of Missouri and Union Electric Company, the NRC, FEMA, local governments (counties and incorporated cities, towns or villages) in the State of Missouri or any other entity relating to radiological emergency plans, planning, response requirements, financial or funding arrangements or agreements, respiratory and thyroid protection, or discussions involving matters which have any bearing upon the above subjects.

ANSWER: Intervenor Reed's first interrogatory, restated above, requests the production of documents relating to a number of subjects that are not within the PSC's jurisdiction or statutory authority, eg., "radiological emergency plans," (emergency?) "Planning," (emergency?) "response requirements" and "respiratory and thyroid protection".

Consequently, with respect to the preceding subjects the PSC states that it is not the State of Missouri (State), and cannot and

does not act for or represent the State in these proceedings. Since this interrogatory requests information pertaining to the State, the PSC believes that said interrogatory is not directed to it. Nevertheless, in the spirit of cooperation and so as to not delay or hinder an expeditious hearing of Mr. Reed's contentions in the above-captioned proceeding, the PSC submits the following response to this Interrogatory.

No such information or documents are routinely filed with the PSC in its normal course and scope of business.

The PSC objects to that portion of Mr. Reed's first interrogatory relating to the production of documents regarding "financial or funding arrangements or agreements" between "the State of Missouri and Union Electric Company" for the following reasons:

1. The requested information is not relevant to the matters in controversy or the stated purpose of said INTERROGATORIES; further, production of the requested documents will not lead to the discovery of admissible evidence.

2. Information relating to financial or funding agreements is more readily and reasonably obtainable from the Applicant and other originating sources than the PSC.

3. The portion of the first Interrogatory referenced above, concerning financial and funding agreements, is so vague as not to be understandable.

ARGUMENT:

Relevancy: According to FINAL PARTICULARIZATION OF REED'S CONTENTIONS 1, 2 and 3 dated June 28, 1982, and received by the PSC July 1, 1982, Mr. Reed asserts three (3) arguments: First, Applicant's arrangements with local government entities concerning

radiological emergency response plans are inadequate; second, funding for the same is also inadequate and should be more closely examined by the NRC and FEMA; third, the allocation of offsite emergency planning responsibility between state and local organizations is inadequately defined. Further, the stated purpose of these INTERROGATORIES is to discover "information and evidence" relating to "emergency planning contentions". Nevertheless, Mr. Reed has not shown how such information regarding Applicant's financial agreements relates to State and local emergency planning arrangements and capabilities, the subject of Mr. Reed's contentions aforesaid.

INFORMATION MORE REASONABLY OBTAINABLE ELSEWHERE: Frequently, electric utilities, such as Applicant, files with the PSC for permission to enter into financial transactions such as revolving credit agreements, nuclear fuel leases, and authority to incur indebtedness, etc. Any such information or documents would originate, and be filed at the PSC, by Applicant or one of its agents. It is the understanding of the undersigned, in discussions with Applicant's counsel of record, Mr. Tom Baxter, that Applicant has in place an operation for responding to intervenor interrogatories and requests for production of documents in this proceeding. It is also the undersigned's understanding Applicant is ready, willing and able to provide requested information and documentation, provided the interrogatories and document requests are reasonable and not objectionable. The PSC objects to having to answer this portion of Interrogatory No. 1 because it would be more logical and direct to seek such documentation from the entity that caused the document(s) to be filed with the PSC in the first place. Furthermore, information contained in the document(s) requested may be proprietary and

confidential, requiring the PSC to seek Applicant's authorization for release of such information to third parties.

VAGUENESS: The wording of that portion of Interrogatory No. 1 relevant to the PSC's jurisdiction is vague enough that it could conceivably cover countless of filings by Applicant with the PSC, possibly going back several decades in time. The particular language used by Intervenor Reed is so vague as to possibly include scores of different types of financial filings by Applicant with the PSC, that over the years could represent hundreds of case dockets and literally thousands of pages of documents. The PSC submits, that assuming for purposes of argument, this portion of Interrogatory No. 1 was relevant, clear and precise, which is denied, it would be too great a burden on the PSC and its Staff to produce the documents requested within the time frame contemplated by the Board. (ASLB's MEMORANDUM AND HEARING SCHEDULE ORDER dated June 9, 1982).

With regard to "documents, correspondence, or memoranda between" the State . . . and "the NRC, FEMA, local governments", relating to "financial or funding arrangements or agreements", the PSC submits that no such information or documents are routinely filed with the PSC in its normal course and scope of business. The PSC does not have the authority to waive any objection that the State or another of its agencies, or the NRC, FEMA or any local government may have to this interrogatory.

INTERROGATORY NO. 2. Produce copies of all lesson plans which will be used by the State of Missouri to instruct courses in procedures to be used in peacetime nuclear incidents and accidents. Include all Federal guidance which supports such instruction and validates the techniques and procedures are taught in such lesson plans.

The PSC is not the State, and cannot and does not act for or

represent the State in these proceedings. Since this interrogatory requests information pertaining to the State, the PSC believes that said interrogatory is not directed to it. Nevertheless, in the spirit of cooperation and so as to not delay or hinder an expeditious hearing of Mr. Reed's contentions in the above-captioned proceeding, the PSC submits the following response to this Interrogatory.

No such information or documents are routinely filed with the PSC in its normal course and scope of business. The PSC does not have the authority to waive any objections that the State or any of its agencies, departments, divisions or representatives may have to this interrogatory.

INTERROGATORY NO. 3. Request the names of all State of Missouri employees in the Radiation Health Division and any other agencies which have a role in the monitoring of personnel, environs, livestock, foods in fields and gardens, or any other field survey required in Union Electric, State of Missouri, and local governmental radiological emergency response plans (RERPs) and standard operating procedures (SOPs), who have received training in which the lesson plans identified in 2, above, were used. Indicate any other formal training the employees so identified may have received from other sources which will affirm their qualifications to perform the duties identified, above.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 4. Request a list of protective equipment be provided of all respiratory devices, protective clothing, TLDS (thermoluminescent dosimeters), film badges, etc. that is available in State of Missouri inventories that the above individuals will use in the performance of their assigned duties during a peacetime nuclear accident. Indicate any shortage of clothing or equipment that could possibly prevent an individual from functioning as required in a radiological environment.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 5. Provide a breakdown of which of the personnel identified above will be assigned to duties in the 10 mile EPZ and which will be assigned to the 50 mile EPZ. Include an estimate of the probable time each man will take to perform his duties in each area.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 6. In the opinion of the State of Missouri, do a sufficient number of qualified radiological monitors and protective equipment exist in State of Missouri inventories to perform all of the

functions in the 10 mile EZP on a simultaneous basis? If so, explain in detail the reasons for such reply. If not, why not, and what action or actions are being taken to resolve this matter.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 7. Provide a list of instructors who will teach classes in peacetime radiological survey and monitoring. Indicate the formal education of each instructor, special educational courses attended which qualify such instructors to teach, past experience with radiation fields, include any other documentation relevant to their professional qualifications to include copies of publications authored or co-authored by the instructors identified above.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 8. Request the names and professional certification of State of Missouri planners who prepared the State of Missouri Radiological Emergency Response Plans. For each name given, provide the title, organizational affiliation, list highest grade attained in formally recognized public or private schools and colleges and any degrees attained thereby, any special education received in planning techniques and the name and accreditation of the school at which such special training was received.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 9. In the Interim Nuclear Accident Plan of 1980, of the State of Missouri, copy 022, page B3, C.2. Exposure to Radioiodines in a Plume, it states that:

"- - The principle inhalation dose will be from the iodines and particulate material in the plume. Due to the ability of the thyroid to concentrate iodine, the thyroid dose resulting from inhalation of radioiodines may be several times greater than the corresponding whole body external gamma dose that would be received."

In table 4-IV-B continued, on page B4, for lifesaving there is no upper limit given for thyroid dose:

" No specific upper limit is given for thyroid dose since in lifesaving activities, complete thyroid loss might be an acceptable sacrifice if a life can be saved. However, this should not be necessary if respirators and/or thyroid protection for rescue personnel are available as a result of adequate planning.

In C.3 Exposure to Particulate Material in a Plume it states:

"- - protective actions (Prophylaxis iodine excepted) chosen on the basis of assuming that the



iodine exposure pathway is critical will be sufficient to provide protection for radioactive particulate material."

Specifically identify the person who prepared the above table and text, indicating applicable Federal documentation which supports the statements quoted, or other documentation which is so supportive. If documentation other than Federal documentation is used, indicate the author of each document, his professional affiliation, formal educational achievements which affirm the author's qualifications in nuclear medicine or radiological health physics. In the opinion of the State of Missouri, are the above quotations representative of actual facts and conditions as relate to exposures of iodines and particulates in a radioactive plume? If the answer is in the affirmative, explain in detail exactly how such relation is created. If the answer is in the negative, explain why such statements were incorporated into this document.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 10. In the State of Missouri Nuclear Accident Plan, Preliminary Issue, dated 4/30/82, page B3, C.2. Exposure to Radioiodines in a Plume, the identical quotation indicated in 9, above, is recorded. On page B4, table 4-IV-B continued, no upper limit is indicated for projected thyroid dose:

" No upper limit is given for thyroid dose since in lifesaving activities, complete thyroid loss might be an acceptable sacrifice if a life can be saved."

No consideration is given for respirators and/or thyroid protection as was done in the earlier interim plan. Sub-paragraph C.3. reads exactly as did the interim plan and paragraph D. reads:

"Following a nuclear incident involving a release to the atmosphere, the most urgent actions in terms of response time will be those necessary to protect the population from inhalation of radioactive materials in the plume - - -."  
(emphasis added)

In the opinion of the State of Missouri, if the information cited above is accurate and representative of actual facts and conditions as relate to exposures of iodines and particulates in a radioactive plume, be specific in explaining why the use of respirators and/or thyroid protection as a result of adequate planning was deleted. Provide a copy of Federal Food and Drug Administration or Environmental Protection Agency guidance which is supportive of this stand and give the name, title, organizational affiliation, address, telephone number of each person responsible for the change in table 4-IV-B. In addition, provide a copy of their statement of professional qualifications, their highest grade attained in a duly accredited school or college, degrees earned and copy of each publication edited, authored or co-authored by each such individual

which is related to radiological medicine, health physics, nuclear reactor accidents or nuclear attack.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 11: Provide the names, titles, organizational affiliations, addresses, and telephone numbers of each and every State of Missouri planner who contributed to or edited any portion of the State of Missouri Interim Nuclear Accident Plan 1980 and the State of Missouri Nuclear Accident Plan, Preliminary Issue, dated 4/30/82. In addition, provide a copy of their statement of professional qualifications, their highest grade attained in a duly accredited school or college, degrees earned, if any, and a copy of each publication edited, authored or co-authored by each such individual which is related to radiological medicine, health physics, nuclear reactor accidents or nuclear attack.

ANSWER: Appendix "A" contains the PSC's response to this Interrogatory as to employees of the PSC who made a contribution to the State of Missouri Interim Nuclear Accident Plan.

INTERROGATORY NO. 12. NUREG 0553, page II-93, clearly states that radiological emergency response plans have legal status. Specify in detail what insurance or other funding the State of Missouri has available to protect against legal suit for inadequate planning or liability claim resulting from injury or property damage during or following a radiological accident at the Callaway Plant No. 1. What liability exists for planners or other individuals who assist in the preparation of plans? What kind of protection is afforded to such planners and individuals? Describe how the State of Missouri views the need for realistic radiological emergency response capabilities in support of commercial nuclear power plants. Describe what steps have been taken to meet other than the minimum standards of planning and response required by the NRC in 10 CFR, Part 50, Section 50.47b; NUREG 0654 FEMA-REP-1, Rev.1; NUREG 0396 EPA 520/1-78-016 or guidance in EPA-520/1-75-001.

ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 13. At Soddy-Daisy, Tennessee, potassium iodine (KI) was issued to 7,000 residents near the Sequoyah Nuclear Power Plant by the Tennessee Valley Authority. The Food and Drug Administration (FDA) has ruled that KI is safe and effective as a thyroid blocking agent which prevents thyroid uptake of radioiodines. The EPA manual of protective action guidelines, EPA-520/1-75-001, includes the use of radioprotective drugs, such as KI. The FEMA has withdrawn any prior objection to use of KI and Union Electric will issue KI to its emergency workers at the Callaway Plant No. 1 for thyroid protection. In light of the cited Federal guidance supporting use and the issuance and proposed issuance of KI, in addition to the sheltering requirements of State and local RERPs, explain in detail why the State of Missouri has decided not to provide KI for emergency workers or the general public. If the justification is for medical

reasons, provide copies of FDA, EJPA, FEMA, or NRC documents which contradict and supercede the Federal guidance cited above. Give the names, titles, addresses, professional affiliations, highest grade completed in duly accredited schools or colleges, degrees earned, if any, a copy of their statement of professional qualifications and a copy of each publication edited, authored, or co-authored by each such individual which is related to radiological medicine, health physics, nuclear reactor accidents, or nuclear attack.

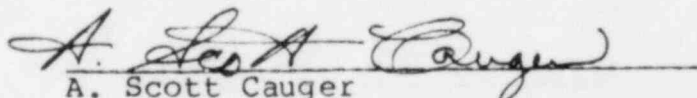
ANSWER: See Interrogatory Answer No. 2.

INTERROGATORY NO. 14. In the "draft EBS announcement", page C21, of the State of Missouri Nuclear Accident Plant, Preliminary Issue, 4/30/82; it states that a quick, effective respiratory protective device can be made by folding a man's handkerchief to eight layers and placing it over the nose and mouth. Such device is recommended for small children, also. Provide copies of Federal documents, citing specific sections, paragraphs, or sentences which support the effectiveness of such respiratory protection as is described above. Additionally, indicate the page(s) and section 10 CFR, Part 20 or NRC Regulatory Guide 8.15 which establishes such filtration as provided by the handkerchief device meets acceptable standards for adults and children. If such documentation cannot be provided, explain in detail why and who made the recommendation as included in the State of Missouri RERP, and give the name(s), title(s), addresses, professional affiliation(s), highest grade successfully completed in duly accredited schools or colleges, degrees earned, if any, a copy of their statement of professional qualifications and a copy of each publication edited, authored, or co-authored by each such individual which is related to radiological medicine, health physics, nuclear reactor accidents, or nuclear attack.

ANSWER: See Interrogatory Answer No. 2.

Respectfully submitted,

MISSOURI PUBLIC SERVICE COMMISSION

  
A. Scott Cauger  
Assistant General Counsel

P. O. Box 360  
Jefferson City, Missouri 65102  
(314) 751-4335

RESPONSE TO ITEM 11

RONALD M. FLUEGGE

Director, Electric Department  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102  
(314) 751-3649

EDUCATION:

Bachelor of Science degree in Metallurgical Engineering  
(Nuclear Engineering Option)

PROFESSIONAL REGISTRATION:

Professional Engineer registration issued by the Missouri Board  
for Architects, Professional Engineers and Land Surveyors

PROFESSIONAL QUALIFICATIONS:

1970-1974

Baltimore Gas & Electric Company

Assigned to the Nuclear Fuel Management Group of  
the Electric Production Department. Startup  
engineer for the Maine Yankee Atomic Power Plant.  
Fueling Supervisor (AEC Special Nuclear Material  
License No. SNM-1364) and Shift Test Supervisor  
for the initial startup of Calvert Cliffs Unit  
No. 1.

1974-1976

U.S. Nuclear Regulatory Commission

Assigned to the Reactor Systems Branch, Division  
of Systems Safety of the Office of Nuclear Reactor  
Regulation. Reviewed reactor license applications  
to evaluate the design and performance of the  
nuclear reactor coolant system, emergency core  
cooling systems and associated supporting auxiliary  
equipment, particularly in the area of nuclear,  
thermal and hydraulic performance. Performed  
reviews and evaluations of the reactor systems and  
components, the effects of plant transients on the  
reactor systems and the effects of postulated  
accidents. Provided review assistance in primary  
and secondary feedback system behavior during ab-  
normal transients and accidents.

PROFESSIONAL QUALIFICATIONS:

1974-1976 Responsible for design review of the following nuclear  
(Continued) power plants:

Jamesport Units 1 & 2 (Westinghouse PWR)  
McGuire Units 1 & 2 (Westinghouse PWR)  
Indian Point Unit 3 (Westinghouse PWR)  
Beaver Valley Unit 1 (Westinghouse PWR)  
Calvert Cliffs Unit 2 (Combustion Engineering PWR)  
Enrico Fermi Unit 2 (General Electric BWR)  
Pilgrim Unit 2 (Combustion Engineering PWR)  
Montague Units 1 & 2 (General Electric BWR)

1976-1979 Diagnostic Services Unlimited, Inc.

Consulted in the areas of radiation safety, radiation surveys, State and Federal regulatory compliance testing, shielding design, radioactive materials licensing and instrumentation calibration. Performed x-ray and gamma ray external beam, interstitial and intracavitary dosimetry for radiation therapy procedures. NRC approved Radiation Safety Officer (NRC licenses nos. 24-00128-03 and 24-00128-05). Licensed to possess, use and transport radioactive materials under U.S. Nuclear Regulatory Commission Materials License No. 24-18234-01, Illinois Radioactive Materials License No. IL-00446-01 and Missouri Radioactive Material Registration No. RM59. Listed by the applicable state agency as a qualified radiation consultant in Missouri, Arkansas, Tennessee, Illinois, Indiana and Kentucky.

1979-Present Missouri Public Service Commission

Involved in the design review and operating license proceedings by the U.S. Nuclear Regulatory Commission and construction audits for Callaway Unit No. 1 and Wolf Creek Unit No. 1, and the operations audits of Arkansas Nuclear One Units Nos. 1 and 2. A member of the Missouri Nuclear Emergency Team for response to events involving radioactive materials and advisor to the Governor's Office for incidents involving nuclear power plants in accordance with the Missouri Nuclear Emergency Plan. Completed the Radiological Emergency Response Training for State government emergency personnel at the U.S. Department of Energy's Nevada Test Site (June 1981).

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
UNION ELECTRIC COMPANY ) Docket No. STN 50-483 OL  
 )  
(Callaway Plant, Unit 1) )

CERTIFICATE OF SERVICE

I hereby certify that copies of "ANSWERS TO INTERROGATORIES OF JOHN G. REED (FIRST SET)" in the above-captioned proceedings have been served on the following by deposit in the United States mail, first class, this 13~~th~~ day of July, 1982.

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U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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Chamois, Missouri 65024

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Shaw, Pittman, Potts & Trowbridge  
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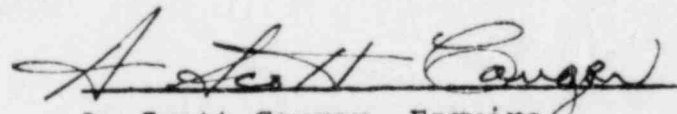
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7370 Dale Avenue  
St. Louis, Missouri 63117

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Owensville, Missouri 65066

  
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