

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
)
PORTLAND GENERAL ELECTRIC COMPANY,) Docket 50-344
et al.)
) (Control Building
(Trojan Nuclear Plant)) Proceeding)

COLUMBIA ENVIRONMENTAL COUNCIL
INTERROGATORIES TO NRC STAFF

Interrogatory 1

What was the formal role and what was the actual role of the AEC Staff in supervising the original design of the Control Room?

Interrogatory 2

Did the AEC Staff independently derive any of the information erroneously relied upon?

Interrogatory 3

To the extent that the scales can be compared, what is the basic Richter scale equivalent of .25g and of .15g?

Interrogatory 4

Describe in detail the planned and the actual on-site supervision of the construction of the Control Room by employees of AEC.

Interrogatory 5

Please state your response of the major paragraph on page two (2) of the letter to Dr. Fred Miller from Harold I. Laursen, Ph.D., P.E., of May 18, 1978. (See Control Building Docket Correspondence, No. 5)

Interrogatory 6

The NRC Staff concluded on May 26, 1978 that there was "reasonable assurance" that the facility would "withstand the SSE" but that "the intended and desired margins of safety are not present." (See Control Room Docket Correspondence, No. 10) The Staff (per Trammell) also estimated that the Control Building had approximately 50% of the seismic capacity originally intended and approved. In the light of the STARDYNE analyses, what would you now estimate the short-fall to be?

Interrogatory 7

As a result of the two recent major downgradings of the seismic capacity of the Control Room as calculated by Licensee and its agents, has the NRC Staff to any extent concluded that Licensee and its agents are less reliable sources of information than previously thought? If so, to what extent? If not, why not?

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CLC Interrogatories to NRC Staff continued.

Interrogatory 8

Has the Staff received the STARDYNE computer programs? If so, have they conducted their own program calculations. If not, why not?

Interrogatory 9

Has the Staff independently derived all or any of the information upon which the STARDYNE programs are based? If not, why not?

Interrogatory 10

If the SSE represents the maximum potential earthquake for the site and OBE represents the maximum earthquake which can be expected to occur at the site during the life of the plant, on what basis is the distinction between these two made? (See letter from A. Schwencer to Dr. Miller, Control Building Docket Correspondence, No. 12)

Interrogatory 11

Please supply the study or other materials on which it was concluded that the concerns expressed in a June 23, 1970 review of the seismic design criteria for the Trojan Nuclear Plant by John A. Bloom and Associates could be disregarded.

Interrogatory 12

Does the Staff know the basis for the statement in the minutes of the Directors meeting of PGE on Sept. 6, 1978 that there was, "general agreement among NRC Staff, Bechtel, the Company's consultant, and the Company that no safety problems would arise due to interim operation."?

Interrogatory 13

If possible, please compute the horizontal ground displacement of an earthquake at .25g.

Interrogatory 14

To what extent is it within the state of the art to predict the pattern of nonlinear behavior of the control room structure across the spectrum up to and including .25g? Please supply all available information on the subject.

Interrogatory 15

In the opinion of the Staff what areas of information supplied by licensee would ideally be independently derived by the Staff itself? If greater staff resources existed, what would be the priorities for the independent derivation of facts which are presently supplied by Licensee?

Interrogatory 16

Why have there been no OBE and SSE test shutdowns? In the absence of such tests, how has it been determined that all relevant employees would respond properly in such an event?

Interrogatory 17

Provide a history of reportable occurrences which have involved design errors.