

1 UNITED STATES OF AMERICA  
2 NUCLEAR REGULATORY COMMISSION  
3 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

4 In the Matter of )  
5 )  
6 PORTLAND GENERAL ELECTRIC ) Docket No. 50-344  
7 Company, ET AL. ) (Control Building Proceeding)  
8 )  
9 (Trojan Nuclear Plant) )

8 STATE OF OREGON RESPONSES  
9 TO COLUMBIA ENVIRONMENTAL COUNCIL INTERROGATORIES

10 1. In the event of loss of life or property from a radiation  
11 accident at Trojan Nuclear Plant, would the State have any duty to  
12 provide compensation to any affected party?

13 Response to Question 1:

14 In our opinion the State of Oregon has no absolute liability  
15 arising from such accidents. (JHS)

16 2. If the occupants of the control room were disabled by  
17 an earthquake, yet the safety equipment was undamaged and the  
18 containment vessel was undamaged, what significant hazard might  
19 result?

20 Response to Question 2:

21 It is unreasonable to assume that an earthquake would be  
22 severe enough to disable occupants of the control room but not  
23 damage safety related equipment. Furthermore, the steps necessary  
24 to accomplish shut down depend upon the operating mode of the  
25 plant at the time of such occurrence. (HH)

Dated this 15th day of November, 1978

Department of Justice  
100 State Office Building  
Salem, Oregon 97310  
Phone 378-4400

Page

John H. Socolofsky  
Assistant Attorney General  
and Counsel

7812110217

G

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

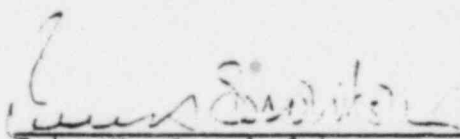
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
PORTLAND GENERAL ELECTRIC ) Docket No. 50-344  
Company, ET AL. ) (Control Building Proceeding)  
(Trojan Nuclear Plant) )


AFFIDAVIT OF JOHN H. SOCOLOFSKY

STATE OF OREGON )  
County of Marion ) ss.

John H. Socolofsky, being duly sworn, deposes and says that he is the Assistant Attorney General representing the State of Oregon, and that the answers associated with his name (JHS) and contained in the answers of the State of Oregon, dated November 15, 1978, to Columbia Environmental Council Interrogatories, are true and correct to the best of his knowledge and belief.

  
\_\_\_\_\_  
John H. Socolofsky  
Assistant Attorney General  
and Counsel

Sworn to and subscribed before me this 15<sup>th</sup> day of  
November, 1978.

  
\_\_\_\_\_  
Notary Public for Oregon  
My Commission Expires: 7-28-81

Department of Justice  
100 State Office Building  
Salem, Oregon 97310  
Phone: 378-4400

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
PORTLAND GENERAL ELECTRIC ) Docket No. 50-344  
Company, ET AL. ) (Control Building Proceeding)  
(Trojan Nuclear Plant) )

AFFIDAVIT OF HARLAN HAYNIE

STATE OF OREGON )  
County of Marion ) ss.

Harlan Haynie, being duly sworn, deposes and says that he is a Nuclear Engineer of the Oregon Department of Energy, and that the answers associated with his name (HH) and contained in the answers of the State of Oregon, dated November 15, 1978, to Columbia Environmental Council Interrogatories, are true and correct to the best of his knowledge and belief.

Harlan Haynie  
Harlan Haynie, Nuclear Engineer  
Department of Energy

Sworn to and subscribed before me this 15<sup>th</sup> day of  
November, 1978.

Robert D. Davis  
Notary Public for Oregon  
My Commission Expires: 7-7-81

Department of Justice  
100 State Office Building  
Salem, Oregon 97310  
Phone 378-4400

CERTIFICATE OF SERVICE

I, John H. Socolofsky hereby certify that on this 15th day of November, 1978, I served the within State of Oregon Response to Interrogatories of the Columbia Environmental Council upon all parties of record by then depositing in the United States Post Office at Salem, Oregon, a full, true and correct copy thereof, addressed to the said parties of record at the following addresses listed below, and prepaying the postage thereon:

Marshall E. Miller, Esq., Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Kenneth A. McCollom, Dean  
Division of Engineering,  
Architecture & Technology  
Oklahoma State University  
Stillwater, Oklahoma 74074

Dr. Hugh C. Paxton  
1229-41st Street  
Los Alamos, New Mexico 97544

Mr. John A. Kullberg  
Route One  
Box 250Q  
Sauvie Island, Oregon 97231

H.H. Phillips, Esq.  
Vice President, Corporate  
Counsel and Secretary  
Portland General Electric Company  
121 S.W. Salmon Street  
Portland, Oregon 97204

Ms. Nina Bell  
632 SE 18th  
Portland, Oregon 97214

Mr. Stephen M. Willingham  
555 N. Tomahawk Drive  
Portland, Oregon 97217

Mr. Eugene Rosolie  
Coalition for Safe Power  
215 SE 9th Avenue  
Portland, Oregon 97214

Robert Lowentstein, Esq.  
Lowenstein Newman, Reis  
& Axelrad  
Suite 1214  
1025 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Mr. David B. McCoy  
348 Hussey Lane  
Grants Pass, Oregon 97526

Ms. C. Gail Parson  
800 S.W. Green #6  
Portland, Oregon 97526

William W. Kinsey  
U. S. Department of Energy  
Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208

Gregory Kifoury, Esq.  
Counsel for Columbia Environmental  
Council  
202 Oregon Pioneer Building  
320 S.W. Stark Street  
Portland, Oregon 97204

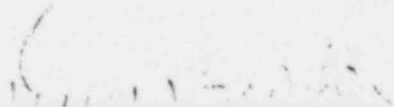
Robert M. Johnson, Esq.  
Assistant Attorney General  
100 State Office Building  
Salem, Oregon 97310

Joseph R. Gray, Esq.  
Counsel for NRC Staff  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing  
Appeal Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, D. C. 20555

  
\_\_\_\_\_  
John H. Socolofsky  
Assistant Attorney General  
and Counsel  
Of Attorneys for the State of Oregon