UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
Wisconsin Public Service Corporation,
Wisconsin Power and Light Company, and
Madison Gas and Electric Company.
License Amendment DPR-43

Docket No. 50-305

INTERROGATORIES PROPOUNDED TO THE APPLICANT
BY LAKESHORE CITIZENS FOR SAFE ENERGY
NOVEMBER 11, 1978

CONTENTION 2

1. Explain how the total airborne radioactive emissions of the combined releases from the Point Beach and Kewaunee facility would affect the vegetation, animal, and human life during a thermal inversion.
2. Identify radioactive emission to the atmosphere and quantify those that are expected from the storage of spent fuel.
3. Provide records of emissions for 1976 and 1977.
4. Provide studies of the prevailing winds and air mass movements.

CONTENTION 8

1. Submit results of experiments on the deterioration of neutron absorber plates presently being carried out. Discuss the effects of high level gamma radiation damage and gas generation in the B_4C plate.
2. Submit studies which support the reliability of the Electroschmelzwerk Kempten GMBH plates.

CONTENTION 12

1. Please indicate the quantity (in cubic feet and pounds), amount of radioactivity (in curies), life span of the radioactive elements therein (in years) of the specific objects (storage racks, filter, etc.,) of lowlevel radioactive

RELATED CORRESPONDENCE

AFFIDAVIT OF MAILING

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of and in the spent fuel storage pool, due to the proposed compaction and long-term storage of spent fuel now proposed for the Kewaunee plant.

CONTENTION 13.c.

1. Please delineate the metallurgical composition of the pool liner, pipes, storage racks, and storage rack bases.
2. If the metallurgical compositions of the items listed in 1. above differ, please submit an analysis of the galvanic corrosion effects of using dissimilar alloys for these components during the period of license due to the compaction and increased quantities of spent fuel as proposed by Applicant.

CONTENTION 13.f.

1. Please forward a documented copy of a study which quantifies the anticipated thickness of crud layers on spent fuel assemblies proposed to be more densely stored in increased quantities at Kewaunee.
2. Please provide an analysis of the tendency of crud to influence corrosion of spent fuel and cladding due to increased and more densely stored spent fuel at the Kewaunee plant.

GENERAL INTERROGATORIES

1. State whether or not you intend to present any witnesses in this proceeding. Provide the names, addresses, complete educational background and related professional experience.

Respectfully submitted,

Sandra A. Bast

wastes increments anticipated to be produced as a result of spent nuclear fuel at the Kewaunee plant.

2. Do Applicants have any plans to store these low level radioactive wastes at the Kewaunee plant throughout the period of license?

3. Do Applicants have any contracts to remove these increased quantities of low level radioactive wastes from the Kewaunee plant grounds?

CONTENTIONS 13.a., b., c., and f.

1. Please forward copies of any and all documented studies which verify that the spent fuel, cladding, and any and all components of and in the spent fuel storage pool will retain their integrity throughout the period of the license under conditions of the more dense and increased storage of spent fuel as proposed by Applicants at the Kewaunee Plant.

Contention 13.a.:

1. Please provide a detailed analysis of the effects of borated water on more densely stored and increased quantities of Kewaunee spent fuel, cladding, support frames, storage racks, fuel basin liner, neutron absorber plantes, and all the other components of and in contact with storage pool boraged water for the duration of the period of license. Please document this analysis.

CONTENTION 13.b

1. Please forward a documented copy of an analysis of the effects of accelerated corrosion, microstructural changes, alterations in mechanical properties, stress corrosion cracking, intergranular corrosion, and hydrogen absorption and precipitation by zirconium alloys on spent fuel cladding and components