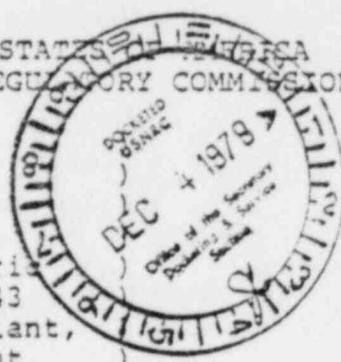


UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of Wisconsin Public Service Corporation, Wisconsin Power and Light Company, and Madison Gas and Electric Company, License No. DPR-43 (Kewaunee Nuclear Power Plant, Application to Modify Spent Fuel Pool)



12/1/78

Docket No. 50-305

INTERROGATORIES PROPOUNDED BY THE STATE OF WISCONSIN TO THE APPLICANTS

The applicants herein are required to answer the following interrogatories in accordance with 10 CFR sec. 2.740(b) and to serve a copy of its answers and objections upon Patrick Walsh, Assistant Attorney General, 114 East, State Capitol, Madison, Wisconsin 53702.

INSTRUCTIONS

- 1. Answer each interrogatory separately and fully in writing under oath, unless it is objected to, in which event the reasons for objection must be stated in lieu of answer.
2. An evasive or incomplete answer is deemed to be a failure to answer under sec. 804.01, Stats.
3. You are under a continuing duty to seasonably supplement your response with respect to any questions directly addressed to the identity and location of persons having knowledge of discoverable matters, and the identity of each person expected to be called as an expert witness at trial. Furthermore, you are under a similar duty to correct any incorrect response when you later learn that it is incorrect.

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4. The following terms are defined as follows for the purpose of these interrogatories.

A. Whenever in these interrogatories a request is made to "list," "describe," or "identify" documents, those terms shall be interpreted as a request to supply as to each document the following information where such information is appropriate for each document.

(1) The type of document (.e.g, letter, memorandum, report, study, etc.);

(2) The date of the document;

(3) The date on which the document or copy thereof came to the applicants' attention;

(4) The name(s) of the signer(s) of the document, and the author(s) if different from the signer(s);

(5) The name(s), if any, of the person(s) to whom the document is addressed;

(6) The present whereabouts of the document or copy thereof and the name and address of the custodian thereof;

(7) Whether the document requested in these interrogatories was in existence or available to the applicants but is no longer available or in existence;

(8) Whether the applicants claim that the document is privileged or otherwise not subject to discovery;

(9) A brief summary of the subject matter of the document; and

(10) Whether the applicants are willing to produce the document.

B. As used in these interrogatories, the term "document" is used in a comprehensive sense and includes, without limiting its generality of meaning, all written, typed, printed, recorded, transcribed or graphic materials, however produced, copied or reproduced, of every kind and description.

C. Whenever in these interrogatories a request is made to state any facts, basis and/or information, in addition to stating the requested facts, basis and/or information, identify the natural person(s) most knowledgeable as to each such fact, basis and/or information and list all documents which relate to any such fact, basis and/or information.

5. All portions of these "instructions" shall be deemed to be a part of these interrogatories.

INTERROGATORIES

Contention 2

1. What is the probability that the radioactive releases from the Point Beach Nuclear Power Plant will combined with those from the Kewaunee Nuclear Power Plant? What meteorological conditions would have to exist for the radioactive plumes from these two plants to come in contact with each other and intermingle? Please set forth the model which you base your estimate upon.

Contention 13

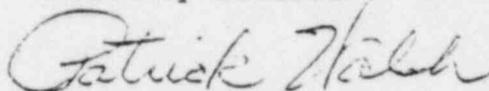
2. State the technical basis upon which you believe that the spent fuel stored in the pool will retain its integrity for the entire period of licensing.

3. Please state the average, median and maximum burn-up of the spent fuel which will be stored in the fuel pool. How does the burn-up of the fuel affect your estimate of long-term fuel integrity? Please be specific. Please state the names of all technical studies and/or experiments with which you are familiar, whether completed or ongoing, which assess the integrity over a forty-year period of spent fuel having a burn-up as high as that of the spent fuel with the maximum burn-up expected to be placed within the Point Beach spent fuel pool.

4. How will the integrity of the fuel rods in the spent fuel pool be monitored?

Dated this 30th day of November, 1978.

BRONSON C. LA FOLLETTE
Attorney General



PATRICK WALSH
Assistant Attorney General

114 East, State Capitol
Madison, Wisconsin 53702
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