

8/13/82

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
DUKE POWER COMPANY, ET AL.  
(Catawba Nuclear Station,  
Units 1 and 2)

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Docket Nos. 50-413  
50-414

NRC STAFF'S SECOND SET OF INTERROGATORIES AND  
DOCUMENT PRODUCTION REQUESTS TO PALMETTO ALLIANCE

In accordance with 10 CFR Sections 2.740, 2.740b and 2.741, the NRC Staff hereby serves Palmetto Alliance as an intervenor in the above-captioned proceeding with NRC Staff's Second Set of Interrogatories and Document Requests to Palmetto Alliance. These interrogatories and document requests relate to Palmetto Alliance contentions 8, 16 and 27, as admitted pursuant to the Licensing Board's Memorandum and Order (Reflecting Decisions Made Following Prehearing Conference), dated March 5, 1982, and Memorandum and Order (Overruling Objections Following Prehearing Conference, Denying Requests for Referral to the Appeal Board, and Addressing Certain Related Questions), dated July 8, 1982.

Each interrogatory shall be answered separately and fully in writing under oath or affirmation, and shall include all pertinent information available to the Palmetto Alliance, its officers, directors, members, employees, advisors, or counsel, based upon the personal knowledge of the person answering. Answers to these interrogatories are required to be served upon all parties to the proceeding within 14 days

DESIGNATED ORIGINAL

Certified By DSF [Signature]

after service of the interrogatories. By each request for production of documents, the NRC Staff seeks to inspect and copy pertinent documents which are in the possession, custody, or control of Palmetto Alliance, its officers, directors, members, employees, advisors or counsel.

As used herein, the term "documents" shall include any writings, drawings, graphs, charts, and schedules, however produced; photographs or other pictorial representations; recordings and tapes, whether sound or visual; and data compilations of whatever form.

Each interrogatory should be answered in six parts as follows:

- (1) Answer the direct question asked or provide the information requested (separately as to each subpart as applicable).
- (2) Identify fully any documents (a) used as the basis for the answer to the interrogatory or (b) related to the subject of the interrogatory upon which you intend to rely in establishing the pertinent contention.
- (3) Give the name, address, occupation and employer of the person or persons (a) answering each interrogatory, or (b) who have served, presently serve, or it is anticipated will serve as consultants or advisors to Palmetto Alliance on the subject matter of the interrogatory.
- (4) Identify each person whom you expect to call as a witness to testify as to the issue addressed in the pertinent interrogatory. As to each such person, please state (a) the subject matter of his or her testimony and (b) the substance of the testimony.
- (5) Is the answer based on a calculation? If so, describe (a) the calculation, (b) identify any documents setting forth such calculation, (c) identify the person who performed each calculation, (d) when it was performed, (e) each parameter used in such calculation, each value assigned to the parameters, and the source of your data, (f) the results of each calculation, and (g) how each calculation provides basis for the answers.
- (6) Is the answer based on conversations, consultations, correspondence or any other type of communications with one or more individuals? If so, (a) identify each such individual

by name and address, (b) state the educational and professional background of each such individual, (c) describe the information received from such individual and its relation to your direct answer, (d) identify each writing or record related to each such conversation, consultation, correspondence or other communication with such individual.

In addition, Palmetto Alliance is requested, pursuant to 10 CFR Section 2.740(e), to supplement its responses as necessary with respect to the identity of each person expected to be called as an expert witness at the hearing in this proceeding, the subject matter on which he or she is expected to testify, and the substance of such testimony. Similarly, Palmetto Alliance is requested to amend its responses if Palmetto Alliance subsequently learns that any response made to the interrogatories herein was incorrect when made, or that the response though correct when made is no longer correct.

If the answer to any interrogatory or portion thereof is fully provided in a response to any other interrogatories which have been previously served in this proceeding, you may answer by so indicating, with specific reference to the portion of the interrogatory addressed in such other answers. You are requested, however, to answer the interrogatories below based on all information in your possession at the time of answering, including any information received subsequent to answering any other interrogatories.

#### INTERROGATORIES

##### PALMETTO ALLIANCE CONTENTION 8 (OPERATOR QUALIFICATIONS)

1. Please explain in detail what you mean by "hands-on operating experience with large pressurized water reactors", as used in Palmetto Contention 8, with respect to (a) reactor operators, (b) senior reactors operators, and (c) shift supervisors.
2. Do you contend that any Commission regulatory requirement requires a person to have "hands-on operating experience with large pressurized water reactors" in order to qualify for a reactor operator or senior reactor operator license?

3. If the answer to Interrogatory 2 is affirmative, please identify each such requirement, and explain why such requirement mandates "hands-on experience" as used in Palmetto Contention 8.
4. If the answer to Interrogatory 2 is negative, on what authority do you contend such a requirement is based? Please explain your answer.
5. With respect to qualification for (a) a reactor operator license, and (b) a senior reactor operator license, what do you contend to be "sufficient" hands-on experience, etc., as used in Palmetto Contention 8?
6. Do you challenge the sufficiency of any requirement or acceptance criteria with regard to operator or senior operator experience set out in NUREG-0737, Item I.A.2.1?
7. If the answer to Interrogatory 6 is affirmative, identify each requirement or acceptance criterion challenged therein.
8. Please explain fully the reasons for any challenge identified in answer to Interrogatory 7.
9. Identify each employee at the Catawba Nuclear Power Plant whom you contend lacks "sufficient hands-on operating experience with large pressurized water reactors."
10. Do you contend that any plant employee not required by NRC regulations to have an operator or senior operator license is required to have the "hands-on" experience referred to in Palmetto Contention 8? Please explain the nature of that "hands-on" experience.

PALMETTO ALLIANCE CONTENTION 16 (SPENT FUEL STORAGE)

11. Do you contend that Applicants fail to meet any regulatory requirement pertinent to the storage at Catawba of irradiated fuel assemblies from Duke's Oconee and/or McGuire nuclear plants?
12. If the answer to the previous interrogatory is affirmative, please identify each and every regulatory requirement which you contend Applicants have not met.
13. For each regulatory requirement identified in the answer to the previous interrogatory, what specific facts form the basis for your position?
14. In light of Applicants' representation in their April 2, 1982 Response 3(b) to Elinor G. Adensam's letter of 3/8/82, do you still contend that storage of spent fuel from Oconee or McGuire poses "increased likelihood of harm, of risk" because of the source term of such spent fuel? (Ref: Tr. pp. 165-166.)
15. If the answer to the previous interrogatory is affirmative, please explain the reasons for your answer.

16. Do you contend that the number, size, source term, or any other characteristic of the spent fuel assemblies which may be stored in the Catawba spent fuel pools, fails to meet any specific regulatory requirement or regulatory guide?
17. If your answer to the previous interrogatory is affirmative, please identify the specific regulatory requirement(s) or guide(s) which you contend has (have) not been complied with?
18. Do you have any other basis for challenging the "ability" of Applicants "safely to...store" irradiated fuel from Oconee and McGuire in the Catawba spent fuel pools?
19. If your answer to the previous interrogatory is affirmative, please explain as specifically as you can each and every basis for such challenge.

PALMETTO ALLIANCE CONTENTION 27 (REAL TIME MONITORS)

20. Please explain precisely what you mean when you refer to (a) "real time monitors" and (b) "around the site", as used in Palmetto Contention 27.
21. Do you contend that placement of real time monitors around the Catawba site is required by any regulation?
22. If your answer to the previous interrogatory is affirmative, please identify the regulatory provision, and explain the basis for interpreting the regulation to require real time monitors.
23. Please identify each and every reason why you believe "Applicants should be required to place real time monitors capable of reading gamma radiation levels around the site."
24. Do you contend that placement of real time monitors around the site is necessary to enable emergency operations personnel at Catawba to make protective action decisions in the event of threatened or actual radiological release to the environment?
25. If your answer to the previous question is affirmative, please give each and every reason which you believe supports the contention that such monitors are necessary to making protective action decisions.
26. What "information required to make decisions", etc., do you contend would be supplied by installation of real time monitors.
27. Do you contend that "a real time monitor is the only way of knowing what the release is at that point" [i.e., the point at which the monitor is placed]? (See, Tr. p. 253.)
28. If your answer to the previous interrogatory is affirmative, please explain each and every reason for your position therein.

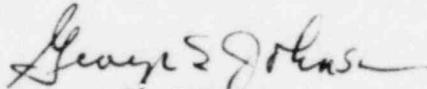
Request for Documents

Pursuant to 10 CFR Section 2.741, the NRC Staff requests you to make available for inspection and copying at a time and location to be designated any and all documents, of whatever description, identified in the responses to the above Staff interrogatories, including, but not limited to:

- (1) any written record of any oral communication between or among Intervenors, their advisors, consultants, agents, attorneys, and/or any other persons, including but not limited to the Applicants, and their advisors, consultants, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letter, memorandum, notes, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to work papers, prior drafts, and notes of meetings.

If Palmetto Alliance maintains that some documents should not be made available for inspection, it should specify the documents and explain why such documents are not being made available. This request extends to any such document, described above, in the possession of Palmetto Alliance its advisors, consultants, agents, or attorneys.

Respectfully submitted,



George E. Johnson  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 13th day of August, 1982.

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S SECOND SET OF INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS TO PALMETTO ALLIANCE", dated August 13, 1982 in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, this 13th day of August, 1982:

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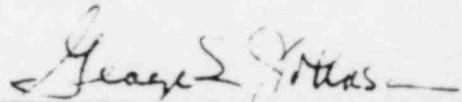
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