

DOCKETED  
USNRC

'82 SEP -7 A11:32

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
PUGET SOUND POWER & LIGHT COMPANY,	)	Docket Nos. STN 50-522
et al.	)	STN 50-523
(Skagit/Hanford Nuclear Project)	)	
<hr/>		Date: September 1, 1982

APPLICANTS' FIRST SET OF  
INTERROGATORIES TO NWF/OEC

Applicants hereby serve their First Set of Interrogatories to the National Wildlife Federation/Oregon Environmental Council (NWF/OEC) pursuant to 10 C.F.R. § 2.740b. Each interrogatory is to be answered fully in writing, under oath or affirmation, by an officer or agent of NWF/OEC and is to include all pertinent information known to NWF/OEC. Each answer should clearly indicate the interrogatory to which it is intended to be responsive.

Under NRC regulations (10 C.F.R. § 2.740(e)) parties are required to supplement responses to interrogatories under certain circumstances when new and/or different information becomes available. NWF/OEC is obligated to comply with this requirement with respect to its answers to Applicants' First Set of Interrogatories.

"NWF/OEC" shall include all agents, employees, attorneys, investigators, and all other persons directly or indirectly subject to NWF/OEC's control in any way. "You" and "yours" refers to NWF/OEC.

"Documents" means all written or recorded material of any kind or character known to NWF/OEC or in its possession, custody, or control, including, without limitation, letters, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records or notation of telephone or personal conversations or conferences, inter-office communications, microfilm, bulletins, circulars, pamphlets, studies, notices, summaries, reports, books, articles, treatises, teletype messages, invoices, tape recordings, computer printouts, and work-sheets.

When used with respect to a document, "identify" means, without limitation, to state its date, the type of document (e.g., letter, memorandum, telegram, chart, photograph, sound reproduction, etc.), the author and addressees, the present location and custodian, and a description of its contents.

When use with respect to a person, "identify" means, without limitation, to state his or her name, address and occupation.

If NWF/OEC cannot answer any portion of any of the interrogatories in full, after exercising due diligence to do so, so

state, and answer to the extent possible, specifying the inability to answer the remainder and stating when NWF/OEC expects to be able to answer the unanswered portions.

The Licensing Board, in its Memorandum and Order of July 6, 1982, admitted three of the NWF/OEC contentions as set forth in paragraphs II.1, 2, 3 of the Order. With respect to contention II.1, regarding need for power forecasts, and contention II.2, regarding alternatives to S/HNP, the May 21, 1982, "Second Supplement to Petition to Intervene of National Wildlife Federation and Oregon Environmental Council" states that NWF and OEC incorporate by reference the contentions and bases filed by the Natural Resources Defense Council (NRDC) in this matter. Applicants assume that the contentions referred to by NWF/OEC are those now set forth in the Board's July 6 Order in paragraphs I.1, 2 and 4, and the bases referred to by NWF/OEC are those supporting these contentions as set forth in NRDC's "Supplement to Amended Petition of the Natural Resources Defense Council, Inc. for Leave to Intervene: Contentions" dated April 20, 1982.

#### INTERROGATORIES

1. With respect to the NWF/OEC contentions set forth in paragraphs II.1 and 2 of the Board's July 6 Order, please respond to the following questions:

A. Does NWF/OEC intend to rely completely upon NRDC's contentions set forth in paragraphs I.1, 2, and 4 of the

Board's July 6 Order and the bases advanced by NRDC for those contentions?

B. If the answer to 1.A is "No," please explain in detail the additional NWF/OEC bases for contentions II.1 and 2.

2. With respect to the NWF/OEC contention set forth in paragraph II.3 of the Board's July 6 Order, identify all of NWF/OEC's basis for this contention.

3. With respect to each basis identified in your answer to Interrogatories 1.B and 2 above, state whether the basis is supported by:

- A. One or more documents.
- B. Any type of study, calculation, or analysis.
- C. Research.
- D. Conversations, consultations, correspondence, or any other type of communications with one or more individuals.

4. If your answer to Interrogatory 3 is one or more documents:

- A. Identify each such document.
- B. Identify the information in each document which supports the basis.
- C. Explain how such information provides support for the basis.

5. If your answer to Interrogatory 3 is any type of study, calculation, or analysis:

A. Describe the nature of the study, calculation, or analysis and identify any documents which discuss or describe the study, calculation, or analysis.

B. When and where was the study, calculation or analysis performed?

C. Identify the person[s] who performed the study, calculation, or analysis.

D. Describe the results of each study, calculation, or analysis.

E. Explain how such study, calculation, or analysis provides support for the basis.

6. If your answer to Interrogatory 3 is research:

A. Describe all such research and indentify each document discussing or describing such research.

B. When and where was the research conducted?

C. Identify the person[s] who conducted the research.

D. Explain how such research provides support for the basis.

7. If your answer to Interrogatory 3 is conversations, consultations, correspondence, or any other type of communications with one or more individuals:

A. Identify each such individual.

B. State the educational and professional background of each such individual, including occupation and institutional affiliations.

C. Describe the nature of each communication with each such individual, when it occurred, and identify all other individuals involved.

D. Describe the information received from each such individual and explain how it provides support for the basis.

E. Identify each letter, memorandum, tape, note or other record related to each conversation, correspondence, or other communication with such individual.

8. Does NWF/OEC intend to offer the testimony of any witnesses at the evidentiary hearings in this proceeding? If yes,

A. Identify each such witness.

B. State the educational and professional background of each such witness, including occupation and institutional affiliations.

C. Specify the subject matter, by contention and basis, upon which each such witness will testify.

9. Does NWF/OEC intend to offer any documents for introduction into evidence at the evidentiary hearings in this proceeding? If yes,

A. Indentify each such document.

B. Specify the subject matter, by contention and basis, to which each such document relates.

C. Identify the information in each such document which relates to the contention and basis.

D. Explain how the information identified in Interrogatory 9.C provides support for the contention and basis.

10. Does NWF/OEC intend to offer any evidence in the evidentiary hearings in this proceeding which is not identified in your answer to Interrogatory 8.A or 9.A? If yes,

A. Identify the nature of each such evidence.

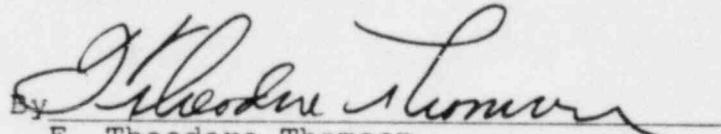
B. Specify the subject matter, by contention and basis, to which each such evidence relates.

C. Explain how such evidence provides support for the contention and basis.

DATED: September 1, 1982

Respectfully submitted,

PERKINS, COIE, STONE,  
OLSEN & WILLIAMS

By   
F. Theodore Thomsen

Attorneys for Applicants  
1900 Washington Building  
Seattle, Washington 98101  
Phone (206) 682-8770

Of Counsel:  
David G. Powell  
Steven P. Frantz  
Lowenstein, Newman, Reis & Axelrad  
1025 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 862-8400