

RELATED CORRESPONDENCE

DOCKETED
USNRC

'82 OCT -4 A11:24

U.S. Nuclear Regulatory Commission

In the matter of
CPC Midland Plant
Units 1 & 2

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH Nos.
50-329 OL
50-330 OL

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

MOTION TO COMPEL ANSWERS FROM CPC TO REVISED STAMIRIS INTERROGATORIES

9/30/82

Questions 6-10 from Stamiris 8/30/82 Interrogatories regarding Contention 1b are objected to upon the grounds that they deal with collection and financing plans for decommissioning outside the jurisdiction of the ASLB (CPC 9/20/82 Response).

I submit that the Board's 8/14/82 Ruling that litigation of the decommissioning subpart of Contention 1 "will at least permit up to have the apparant discrepancies in various figures clarified" supports the need for a comparative analysis between Consumer's Big Rock and Palisades (B. Rock and P) decommissioning estimates and those for Midland which these interrogatories address.

Consumer's 1981 decommissioning pamphlet (attached) indicates a \$111 million (1980 dollar) cost to decommission B. Rock and P, 63 MWe and 635 MWe, or \$159 thousand per MWe. Yet Midland's decommissioning estimate is \$235 million (1984 dollars) for 1704 MWe capacity, or \$137 thousand per MWe.

The 1704 MWe is determined by assuming that the twin reactors were both producing the full 852 MWe capacity of Unit II, since for decommissioning purposes the reduced electrical output of Unit I due its supplying steam to Dow cannot be taken into account. The full radioactive core capacity regardless of its end use, must be decommissioned. This full MWe capacity assumption is essential to a comparative analysis of B. Rock and P on a decommissioning cost per MWe basis.

8210050240 820930
PDR ADOCK 05000329
PDR

DS03

To further validate a comparison between the B. Rock and P decommissioning estimates and those for Midland, the dollar values must be converted to the same year. Thus the 1980 \$111 million B. Rock and P estimate is converted to a 1984 dollar value by using the 7.5% annual escalation rate (CPC 9/20/82 Response, P. 7) to become \$148 million in 1984 dollar values. This represents \$212 thousand per MWe in 1984 dollars (\$148 million/698 MW), for B. Rock and P. while Midlands estimate is \$138 thousand per MWe in 1984 dollars (\$235 million/1704 MWe).

This method of comparing Midland's decommissioning estimate to the B. Rock and P estimates eliminates any need to discuss the financing and collection plans to which Consumer's objected. Therefore I seek to replace 8/30/82 Interrogatories 6-10 with these revised requests which seek a straightforward comparison of B. Rock and P decommissioning estimates to Midland's, leaving aside ratepayer considerations.

Revised Interrogatories on Contention 1b, replacing 6-10:

1. Explain in detail how the \$111 million (1980 dollar) decommissioning estimate for B. Rock and P was determined.
2. To what extent is Midland's decommissioning estimate based upon the model described in 1 above for B. Rock and P (explain any differences)?
3. How would you convert B. Rock and P \$111 million 1980 dollar decommissioning estimate into 1984 dollars, and what would the 1984 dollar estimate be for B. Rock and P.
4. Explain in detail the apparent discrepancy between B. Rock and P 1984 dollar decommissioning estimate on a cost/MW basis, with the Midland 1984 dollar decommissioning estimate on a cost/MW basis, and provide the relevant calculations or other documentary bases for this explanation.

8/30/82 Interrogatory 11 regarding decommissioning taxation rates is dropped.

8/30/82 Interrogatory 18: "Explain any contingency economic plans for shortened life expectancy of Unit I, in terms of electrical production and related costs

to ratepayers, and in terms of inability to produce steam for Dow according to contractual obligations. What will happen if Unit I must shut down after 10 years?"

Consumers 9/20/82 response to the last part of Q. 18 indicates that if Unit I cannot provide steam to Dow, there is a contractual obligation that Unit II would provide that steam. If that happened the whole cost/benefit analysis of the FES would be invalid, as the cost/benefit analysis is based upon an assumed 8 billion kwh annual electrical production (p. 6-2 FES).

In light of the Unit I beltline weld life expectancy uncertainties, and the 1973 decision to switch Units I and II so that II could come on line first at Dow's request (CPC 9/20/82 Response to Q. 26 and 27, p. 15-17) it appears that the dependability of Unit I is questionable. The possibility of a significantly reduced electrical output from Midland should Unit I fail to operate at any time should be taken into account.

Therefore I seek to focus the Q. 18 request on the effects of a possible Unit I failure on Consumer's input to the cost/benefit analysis of the FES, as opposed to effects on ratepayers.

Revised Q. 18: "Explain the effects of a postulated Unit I failure and shortened life expectancy of Unit I in terms of electrical production and the related costs and benefits of Midland plant operation."

Respectfully Submitted,

Barbara Stamiris

Barbara Stamiris
5795 N. River Road
Freeland, MI 48623

cc. AS' B members