

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'82 OCT -4 A11

In the Matter of)	
)	
PUGET SOUND POWER & LIGHT CO.)	Docket Nos. STN 50-522
et. al.)	STN 50-523
)	
(Skagit/Hanford Nuclear Project))	Date: September 28, 1982

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COALITION FOR SAFE POWER RESPONSE TO FIRST
SET OF INTERROGATORIES FROM APPLICANT - SEPTEMBER 17, 1982

The Coalition for Safe Power (Coalition) submits herein the answers to the Applicant's First Set of Interrogatories. These responses were prepared by Eugene Rosolie and Nina Bell, Director and Staff Intervenor respectively, of the Coalition who affirm that all representations are true and correct to the best of their knowledge.

Interrogatory 1

The majority of the bases for the Coalition's contentions admitted by the Atomic Safety and Licensing Board (ASLB) in its Order of July 6, 1982 are contained in the supporting discussion of each contention in the "Revised Contentions of Coalition for Safe Power, May 24, 1982". Further support includes: CFSP 1: N/A CFSP 4: N/A CFSP 14: Additional bases are set forth in CFSP Contentions Nos. 15, 16, 17, 18, 19, 20 and 21. CFSP 25: N/A CFSP 26: The Coalition does not intend to oppose the motion for summary disposition of this contention and therefore declines to answer the interrogatories regarding it. CFSP 29: N/A CFSP 30: Additional bases are set forth in CFSP Contention 14. CFSP 35: Additional bases are set forth in CFSP Contentions Nos. 6, 24, 32 and 34.

Interrogatory 2

CFSP 1: A CFSP 4: A CFSP 14: A CFSP 25: A CFSP 26: N/A CFSP 29: A
CFSP 30: A, D CFSP 35: A

Interrogatory 3 (A,B,C)

Each document relied upon has been identified, described and discussed in the Revised Contentions of the Coalition for Safe Power, May 24, 1982 with no exceptions at the present.

Interrogatory 4 (A, B, C, D, E)

N/A

Interrogatory 5 (A, B, C, D, E)

N/A

Interrogatory 6 (A, B, C, D, E)

N/A

CFSP 30: A. John Gofman, MD PhD

B. Professor Emeritus of Medical Physics, University of California at Berkeley.

D. General Information regarding his findings as presented in the documentation referred to above. These conversations led to the conclusion that low-level radiation has far more somatic, genetic and congenital effects than stated by any segment of the nuclear industry or any nuclear utility including Puget Sound Power & Light.

C. At different times since Fall 1977.

E. None Exist.

Interrogatory 7

The Coalition has not retained the services of any expert witnesses at this time.

Interrogatory 8

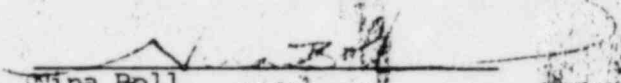
The evidence the Coalition intends to offer is limited at this time to all the documents identified in the responses to Interrogatory 3 above.

Interrogatory 9

At this time the Coalition has not identified any other evidence.

The Coalition will comply with 10 CFR 2.740(e) as it becomes necessary and supplement the responses to these interrogatories.

Respectfully submitted,


Nina Bell

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CERTIFICATE OF SERVICE

I hereby certify that copies of "COALITION FOR SAFE POWER RESPONSE TO FIRST SET OF INTERROGATORIES FROM APPLICANT - SEPTEMBER 17, 1982" in the above captioned proceedings have been served on the following by deposit in the United States mail, first class, postage prepaid on this 29th day of September, 1982.

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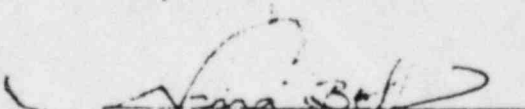
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