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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Before Administrative Judges:
Marshall E. Miller, Chairman
Gustave A. Linenberger, Jr.
Dr. Cadet H. Hand, Jr.

In the Matter of _____

UNITED STATES DEPARTMENT OF ENERGY _____
PROJECT MANAGEMENT CORPORATION _____
TENNESSEE VALLEY AUTHORITY _____

(Clinch River Breeder Reactor Plant) _____

Docket No. 50-537

INTERVENORS, NATURAL RESOURCES
DEFENSE COUNCIL, INC. AND THE SIERRA
CLUB SUPPLEMENTAL RESPONSE TO APPLICANTS'
SECOND SET OF ADMISSIONS AND SEVENTH SET OF
INTERROGATORIES DATED OCTOBER 4, 1982

Pursuant to 10 CFR § 2.740 (e), Intervenors, Natural Resources
Defense Council, Inc. and the Sierra Club, hereby supplement their
response to Requests for Admissions Nos. 1, 6, 7, and 8, of Applicants'
Second Set of Admissions, as well as to that portion of Applicants'
Seventh Set of Interrogatories relating to those Requests for Admission.

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The responses contained herein replace completely the responses provided by Intervenors on October 18, 1982.

REQUEST FOR ADMISSION

Admission

1. NUREG-0625 has not been adopted by the Nuclear Regulatory Commission as nuclear reactor siting requirements in regard to site isolation and population density.

Response

1. Intervenors can neither admit nor deny this statement since the statement does not call for an admission as to any relevant matter of fact, but calls for a legal conclusion on which the NRC regulations speak for themselves.

Admission

6. The background frequency of genetic disorders in the population is on the order of 100,000 per million live born offspring.

Response

6. Intervenors can neither admit nor deny this statement without a more precise definition of what constitutes "genetic disorders." See The Effects on Populations of Exposure to Low Levels of Ionizing Radiations, Report of the Advisory Committee on the Biological Effects of Ionizing Radiations (BEIR I Report), 1972, at 56.

Admission

7. A maximum estimate of the increased frequency of genetic disorders at equilibrium as a result of a dose of 1 rem of radiation to the population per generation is on the order of 1,000 per million live offspring.

Response

7. Intervenors admit this statement to the extent that a maximum estimate was made by the BEIR-III Committee of the increased frequency of "human hereditary disorders" as a result of a dose of 1 rem of parental exposure received in each generation, before conception, which was 1100 per million liveborn offspring, which is on the order of 1,000 per million liveborn offspring. Intervenors deny that this is the only "maximum estimate" made. Furthermore, the rate of disorders/rem of parental exposure depends on what diseases are included in the term "genetic disorders." See response to Request for Admission # 6 above.

Admission

8. Estimates of the increase in genetic disorders as a consequence of 1 rem radiation per generation, based on information obtained directly from human exposure, show that such increases will be a very small fraction of the background frequency.

Response

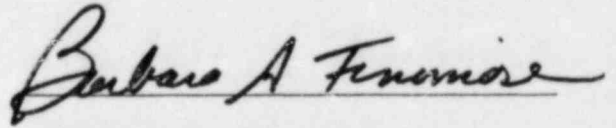
8. Intervenors can neither admit nor deny this statement without a more precise definition of what constitutes "a very small fraction."

Interrogatories

1(d), 6(d), 7(d), 8(d)

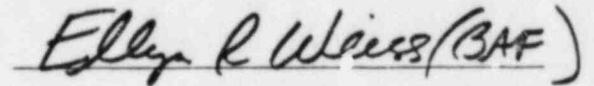
Intervenors have not yet determined whether they intend to rely upon the matters set forth above in support of their position at the forthcoming hearings.

Respectfully submitted,



Barbara A. Finamore
S. Jacob Scherr

Natural Resources Defense
Council, Inc.
1725 I Street, NW, #600
Washington, D. C. 20006
(202) 223-8210



Ellyn R. Weiss

HARMON & WEISS
1725 I Street, NW, #506
Washington, D. C. 20006
(202) 833-9070

Attorneys for Natural
Resources Defense Council
Inc. and the Sierra Club

Dated: October 21, 1982