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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'82 NOV -1 A11:13

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of

PUBLIC SERVICE COMPANY OF  
NEW HAMPSHIRE, et al.

Docket Nos. 50-443  
50-444

(Seabrook Station, Units 1  
and 2)

SAPL FIRST SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO APPLICANT PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE

Pursuant to 10 C.F.R., §2.740(b), the Intervenor SAPL requests that the attached Interrogatories be answered fully in writing and under oath by any members of the Public Service Company of New Hampshire, Inc. ("PSCO") who have personal knowledge thereof.

1. What criteria and standards were used to analyze the probability of occurrence of radiation and/or radioactive material releases and the probability of occurrence of the environmental consequences of those releases as required in the Interim Policy Statement of the NRC dated June 13, 1980?
2. What weight was given to those probabilities?
3. What computer code or methodology was used?
4. What events or accident sequences were identified and included in the analysis?
5. What was the weight given to such events or accident sequences in the analysis?
6. Identify the inplant accident sequences leading to releases that were included in the analysis. Identify those inplant sequences which can result in inadequate cooling of reactor fuel and to melting of the reactor core.
7. Identify those inplant sequences which were not included in the analysis.
8. Identify those events which arise from causes external to the plant which are considered possible contributors to risk associated with the Seabrook plant.
9. What was the weight accorded to events arising external to the plant?
10. What events arising external from the plant were not considered possible contributors to risk associated with the Seabrook plant?
11. What is the overall methodology used in the probabilistic analysis estimate as required in the Interim Policy Statement of June 13, 1980?

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12. What is the weight or basis given to environmental consequences of releases whose probability of occurrence was estimated and included in the analysis? Specifically what weight was given to potential radiological exposures to individuals, to population groups and to the biota?
13. Identify those health and safety risks that were analyzed and give the basis or weight which those consequences had in the overall analysis. Also identify the socio-economic impacts that were included in the analysis and identify those socio-economic impacts that might be associated with emergency measures during or following an accident.
13. On what basis and what weight was given to the environmental risk of accidents which was compared to and contrasted with radiological risks associated with normal and anticipated operational releases?
14. In accordance with the Interim Policy Statement of June 13, 1980, in which the Commission stated that the state-of-the-art of probabilistic risk assessments is sufficiently advanced so that a beginning should now be made in the use of these methodologies in the regulatory process, what is the current state-of-the-art methodology which the Applicant utilized in discussing environmental risks associated with accidents?
15. Identify specifically the significant site features and significant plant specific features of the Seabrook nuclear power plant which were studied in the Applicant's Environmental Risk Assessment as required in the NRC's Interim Policy Statement, June 13, 1980.
16. Please state whether PSCO has performed or contracted for the performance of any studies assessing the probability of occurrences for any or all of the following American Nuclear Society Condition IV events:
  - A. "Steam System Piping Failures" under the classification of "Increase in Heat Removal by the Secondary System" in the Final Safety Analysis Report, Vol. 12, page 15.1-13.
  - B. "Feedwater System Pipe Break" under the classification "Decrease in Heat Removal by the Secondary System" in the Final Safety Analysis Report, Vol. 12, page 15.2-16.
  - C. "Reactor Coolant Pump Shafts Seizure (Cracked Rotor)" under the classification "Decrease in Reactor Coolant System Flow Rate" in the Final Safety Analysis Report, Vol. 13, Page 15.3-5.
  - D. "Reactor Coolant Pump Shaft Break" under the classification "Decrease in Reactor Coolant System Flow Rate" in the Final Safety Analysis Report. Vol. 13, page 15.3-11.
  - E. "Spectrum of Rod Cluster Control Assembly Ejection Accidents" under the classification "Reactivity and Power Distribution Anomalies" in the Final Safety Analysis Report, Vol. 13, page 15.4-27.
  - F. "Steam Generator Tube Rupture" under the classification of "Decrease in Reactor Coolant Inventory" in the Final Safety Analysis Report", Vol. 13, page 15.6-5.

- G. "Loss of Coolant Accidents Resulting from a Spectrum of Postulated Piping Breaks within the Reactor Coolant Pressure Boundary" under the classification "Decrease in Reactor Coolant Inventory" in the Final Safety Analysis Report, Vol. 13, page 15.6-12.
- H. "Fuel Handling Accident" under the classification "Radioactive Release from a system or Component" in the Final Safety Analysis Report, Vol. 13, page 15.7-10.
17. If any studies have been done with respect to any or all of the items in question 16. above who performed the studies?
18. If any studies have been done with respect to any or all of the items in question 16 above, what were the sources of data used in the studies?
19. If any studies have been done with respect to any or all of the items in question 16 above, were they based on data obtained before or after the Three Mile Island accident?
20. If any studies have been done with respect to any or all of the items in question 16 above, what were the costs of the studies?
21. If any studies have been performed with respect to any or all of the items in question 16 above, have they been updated since the Three Mile Island accident?
22. Please provide copies of any and all studies referred to in question 16.

Respectfully submitted,

SEACOAST ANTI-POLLUTION LEAGUE

By Its Attorneys,

LAW OFFICES OF ROBERT A. BACKUS

BY: 

ROBERT A. BACKUS

P. O. Box 516

Manchester, NH 03105

(603)668-7272

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## SERVICE LIST

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OFFICE OF SECRETARY  
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Helen Hoyt, Chm.  
Admin. Judge  
Atomic Safety & Lic. Ap.  
Board - U.S. NRC  
Washington, DC 20555

Thomas G. Dignan, Esq.  
Ropes and Gray  
225 Franklin Street  
Boston, MA 02110

Dr. Jerry Harbour  
Admin. Judge.  
Atomic Safety & Lic. Ap.  
Board - U.S. NRC  
Washington, DC 20555

Docketing and Service Sec.  
Office of the Secretary  
U. S. NRC  
Washington, DC 20555

Roy P. Lessy, Jr., Esq.  
Office of Executive  
Legal Director  
U.S. NRC  
Washington, DC 20555

Robert L. Chiesa, Esq.  
95 Market Street  
Manchester, NH 03101

Phillip Ahrens, Esq.  
Asst. Atty. General  
State House, Station #6  
Augusta, ME 04333

Jane Doughty  
Field Director  
SAPL  
5 Market Street  
Portsmouth, NH 03801

Wilfred L. Sanders, Esq.  
Sanders & McDermott  
408 Lafayette Road  
Hampton, NH 03842

Tupper Kinder, Esq.  
Attorney General's Office  
State of New Hampshire  
Concord, NH 03301

Dr. Emmeth A. Luebke  
Admin. Judge  
Atomic Safety & Lic. Ap.  
Board - U.S. NRC  
Washington, DC 20555

David R. Lewis  
Atomic Safety & Lic. Brd.  
U. S. NRC - Rm. E/W-439  
Washington, DC 20555

Jo Ann Shotwell, Asst. AG  
One Ashburton Place, 19th  
Floor  
Boston, MA 02108

William S. Jordan, II, Esq.  
Ellyn R. Weiss, Esq.  
1725 I Street, N.W.  
Suite 506  
Washington, DC 20006

Edward J. McDermott, Esq.  
Sanders and McDermott  
408 Lafayette Road  
Hampton, NH 03842