

11/10/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al.
(Seabrook Station, Units 1 and 2)

Docket Nos. 50-443 OL
50-444 OL

NRC STAFF'S INTERROGATORIES AND REQUESTS FOR
DOCUMENT PRODUCTION TO SEACOAST ANTI-POLLUTION LEAGUE

NRC Staff hereby requests that Seacoast Anti-Pollution League (SAPL), pursuant to 10 C.F.R. §§ 2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents therein identified, SAPL file supplemental responses and produce additional documents as required by 10 C.F.R. § 2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

DESIGNATED ORIGINAL

Certified By

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As used in these discovery requests the term "document(s)" includes publications of any format, letters, memoranda, notes, reports, analyses, test results or data, recordings, transcriptions and printed, typed or written materials of every kind.

I. INTERROGATORY I

For each contention listed in the Specific Interrogatories contained herein (SAPL Supplement 3 and NH 9, 10, and 13), state the following information separately for each contention:

Q.I(1) Upon what person or persons do you rely to substantiate in whole or in part the view(s) as stated in this contention?

Q.I(2) Provide the addresses and education and professional qualifications of any person(s) named in response to the above interrogatory.

Q.I(3) Identify any person(s) you may call as a witness or witnesses on this contention.

Q.I(4) Provide summaries of the views, positions, or proposed testimony on this contention of all persons named in response to interrogatories (1) and (3) immediately above that you may present during this proceeding.

Q.I(5) State the specific bases and references to any documents upon which the persons named in Interrogatories 1 and 3 immediately above may rely or reference regarding this contention.

Q.I(6) List all documentary or other materials that you may use during this proceeding to support this contention or refer to during examination of witnesses. The list should be by author, title, date of publication (if applicable), and publisher (if applicable). In addition

to listing such documents, provide a copy of all documents (except for those that are NRC documents or documents provided to the NRC in this that are NRC documents or documents provided to the NRC in this proceeding, which need only be listed. If you are uncertain as to whether a document was provided to the NRC, provide that document.

II. SPECIFIC INTERROGATORIES

A. SAPL

Supplement 3: The applicable requirements of the Commission's Interim Policy Statement issued June 13, 1980, 45 Fed. Reg. 40101 on Nuclear Power Plant Accident Considerations Under the National Environmental Policy Act of 1969 have not been met.

S.3.a. Explain in detail all reasons underlying the statement that the Applicant's analysis of Class 9 accidents, contained in its environmental report, fails to satisfy the Commission's policy statement of June 13, 1980 at 45 Fed. Reg. 40101.

S.3.b. State and explain in detail the steps, if any, that you believe must be taken to correct the deficiencies listed in the answer to question S.3(a).

S.3.c. Describe in detail the site features, availability of sheltering, and population densities at Seabrook that you believe should affect the analysis of Class 9 accidents, and explain for each identified item how and why it would change the analysis.

S.3.d. Describe the consequences of a Class 9 accident that you feel would require that a license for the facility be denied or that the plant be modified and state and explain the technical or other bases for your belief.

S.3.e. Describe and explain in detail the conditions that you feel must be attached to the issuance of an operating license; supply the basis or reasons for imposing such conditions; and describe and explain the plant modifications, if any, that you believe should be undertaken to satisfy these conditions.

S.3.f. State the steps that you feel the Applicant must take to satisfy the requirements of 10 C.F.R. § 50.40.

S.3.g. State and explain the bases for your view that the Wash-1400 methodology for analyzing Class 9 accidents is discredited.

S.3.h. State and explain the method that you believe should be used in analyzing Class 9 accidents in lieu of that of Wash-1400.

II. SPECIFIC INTERROGATORIES

B. NH CONTENTION 9

Radioactive monitoring

The Seabrook design does not provide an adequate program for monitoring the release of radioactivity to the plant and its environs either under normal operating conditions or in pre- and post-accident circumstances. Thus, the application is not in compliance with general design criteria 63, 64 of Appendix A, 10 C.F.R. Part 50, and the requirements of NUREG-0737 and NUREG-0800.

Q.9(a) Specify in detail: (1) the equipment, components, and procedures of the Seabrook in-plant monitoring system that you allege are not in compliance with GDC Nos. 63 and 64 of 10 C.F.R. Part 50, Appendix A, or the requirements of NUREG-0737; (2) the precise requirements of GDC 63, GDC 64 and Appendix A that are alleged to have not been met; (3) the

reasons for asserting non-compliance for each GDC or Appendix A; and
(4) the means by which you believe these alleged deficiencies can be cured. ♣

9(b) Are you alleging that there is a lack of adequate monitoring capacity in terms of the range of monitoring equipment and the location and number of monitoring sites? If so, provide the bases for this assertion and describe and explain what you believe should be done to correct any shortcomings.

9(c) Do you assert that radiation monitoring for radioactivity which may be released due to anticipated operational occurrences at Seabrook is inadequate to protect the public health and safety? If so, state the bases for this assertion and the means by which you feel any shortcoming can be corrected.

9(d) Provide and discuss in detail your basis for asserting that the Applicants will not provide sufficient radiation monitoring capacity in containment spaces which could contain LOCA fluids, effluent discharge paths, and plant environs as required by General Design Criterion 64.

9(e) Are you asserting that the health physics division at the plant is not qualified or properly staffed to perform its function? If so, provide in detail the bases for such assertion. Include in your response a discussion of the provisions of Regulatory Guide 1.97 assertedly not being met by the Seabrook Applicants.

C. NH CONTENTION 10

Control Room Design

The Seabrook Station Control Room Design does not comply with General Design Criteria 19 through 22 and 10 C.F.R. Part 50, Appendix A, and NUREG-0737, Items I.D.1 and I.D.2.

Q.10(a) Specify in detail the equipment, design features, or other components of the Seabrook Station Control Room Design that you contend do not comply with General Design Criteria 19-22 and 10 C.F.R. Part 50, Appendix A, and NUREG-0737, Items I.D.1 and I.D.2.

10(b) For each noncompliance identified in your response to 10(a), describe in detail: (1) the specific regulatory requirement allegedly not satisfied; (2) the technical reasons and bases for the assertion of the alleged noncompliance with NRC requirements; and (3) the means, in your views, by which these shortcomings should be corrected.

10(c) Do you assert that an adequate Detailed Control Room Design Review ("DCRDR") will not be conducted? If so, provide in detail the bases for your assertion and describe what you consider to be the proper method of conducting a DCRDR.

10(d) Do you assert that human factors have not been properly considered in the design of the Seabrook control room? If so, provide the detailed bases for your assertion and describe how you believe human factors should be considered.

10(f) Provide the bases for the assertion on page 27 of New Hampshire's April 5 contentions that the Applicant "must provide a system which meets the specifications of Regulatory Guide 1.47."

10(g) State: (1) how the Applicant fails to meet the provisions of Reg. Guide 1.47; (2) the technical bases and reasons for these alleged shortcomings; and (3) how these shortcomings should be corrected.

10(h) Do you contend that the Seabrook facility will lack the capability to promptly place the reactor in hot shutdown or subsequently place the reactor in cold shutdown through the use of equipment located

outside the control room as required by General Design Criteria 19? If so, provide in detail the basis for your assertion. Include in your response, if you are able, specific references to the design of the Seabrook facility.

D. NH CONTENTION 13

Operation Personnel Qualifications

The Applicant has not demonstrated that the following operations personnel are qualified and properly trained in accordance with NUREG-0737, Items I.A.1.1, I.A.2.1, I.A.2.3, II.B.4, I.C.1, and Appendix C:

- a. Station Manager
- b. Assistance Station Manager
- c. Senior Reactor Operators
- d. Reactor Operators; and
- e. Shift Technical Advisors.

Q.13(a) State in detail the bases for your assertion that the listed employees are not adequately trained. Include in your response the specific reasons you feel that the Applicant's training program will be inadequate.

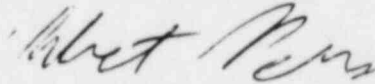
13(b) For each category of personnel listed, state the regulatory or other criteria by which that category's training should be tested and the steps that New Hampshire believes the Applicant must take to satisfy these criteria. In particular, delineate and discuss the aspects of NUREG-0737 that have not been met and that you believe must or should be met by each personnel category in the contention.

13(c) Do you assert that the training center staff will not provide proper instruction to reactor operators in technical engineering topics? If so, provide the basis for your assertion.

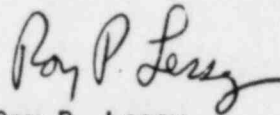
13(d) Besides the NRC letter mentioned in the Basis to Contention 13,

specify in detail any reasons you have to believe that the Applicant will be unable to develop a training program to teach the proper responses to accidents in which the core is damaged.

Respectfully submitted,



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Dated at Bethesda, Maryland
this day of November, 1982.

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