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OFFICE OF SECRETARY
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U. S. Nuclear Regulatory Commission

In the matter of
CPCo. Midland Plant
Units 1 & 2Docket Nos.
50-329 OL
50-330 OL

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DISCOVERY ON STAMIRIS COST/BENEFIT CONTENTION TO THE NRC STAFF

11/26/82

Pursuant to the Board's 10-29-82 Memorandum and Order, Intervenor Stamiris submits the following interrogatories and document requests to the NRC. Intervenor requests that answers be provided within 30 days.

1. Explain in detail the NRC's analysis of information supplied by CPC regarding the effects of the Dow Steam reservation change on the cost/benefit analysis (#22, A-31 FES). How does this affect your FES assessment of:
 - a. Replacement energy costs
 - b. Reduced generating costs
 - c. Electrical capacity factor
 - d. Any other elements of cost/benefit analysis
2. Explain the basis for your 6.4.3 concluding sentence changes (6-5 DES, 6-3 FES) from 1310 MWe to 1357 MWe.
3. Explain the increase of electrical energy from DES 7 billion kw/year to FES 8 billion kw/year.

4. Why isn't the increased Dow steam reservation (#22, A-31 FES) reflected in a reduction in electrical capacity?
5. a. Why did the NRC use a (1310 MWe) design rating in assessing additional generating capacity in the DES, but a (1357 MWe) gross nameplate rating in the FES (tables 6.1 6-2 DES, 6-4 FES)?
 - b. If a design rating had been used in the FES, would it have remained at 1310 MWe? If not, explain.
6. a. How can the NRC Staff justify the selective application of the Commissions 4-26-82 ruling on "need for power" issues so as to dismiss all "need for power" considerations on the cost side of their analysis (sec. 2) while maintaining the "need for power" considerations implicit in the cost savings of the benefit side of their analysis (sec. 6)? (p. 2-1 FES, concluding sentence)
 - b. Considering this imbalance (7a), does the NRC judge their "large" assessment of benefit for reduced generating costs (table 6.1 FES) to be a valid and fair representation of plant operating costs and benefits to the public? If yes, explain. If no, how will this be rectified.
 - c. Considering the exclusion of other construction cost impacts, does the NRC judge their "large" assessment of benefit (table 6.1 FES) for local property taxes to be a valid and fair representation of plant operating costs and benefits to the public? If yes, explain. If no, how will this be rectified.
7. a. In what manner and to what extent did the NRC rely on revised CPC cost forecasts (#3 p. A-28 FES) to revise their cost/benefit analysis?
 - b. What were the "latest cost forecasts" provided to the NRC for their FES cost/benefit analysis?
8. a. In what manner and to what extent did the NRC consider soils remedial measures such as:

1. Permanent dewatering systems
2. Pipe monitoring systems
3. Structural monitoring systems (cracks or stress analyses)
4. Any others

in estimating their plant operation maintenance expenses?

- b. If these were not previously considered, does the NRC intend to consider them now? Explain.
9. a. Explain the analysis performed by the NRC of the proposed FES replacement energy and "reduced generating cost" information supplied by CPC.
- b. In assessing reduced generating costs based upon CPCs replacement energy cost submissions, to what extent were the capital or construction costs of replacement energy facilities considered?
 - c. Why does the NRC accept CPC's reliance on the higher priced "purchased power" (FES subtable 2.1, p. A-32) instead of basing replacement energy costs on the most economical alternative?
 - d. How did the NRC confirm the validity of the proposed changes in the FES cost/benefit analysis.
10. a. Why did the NRC use an averaging approach to compute "reduced generating costs" over 1984-88 but use 1984 data alone to represent production costs?
- b. Does the Staff believe that a consistent methodology or approach should be used in computing costs and benefits of plant operation?
 - c. If yes, explain how the necessary changes will be implemented. If not, explain.
11. a. Upon what basis did the NRC determine the validity of CPC's 12-14-82 load forecast revision (subtable 2.1, p. A-32 FES) which resulted in the DES to FES increase in cost savings and table 6.1 reduced generating costs?

b. What was the load forecast revision data provided to the NRC in support of this suggested FES change?

12. Provide any documents other than those supplied by CPC upon which changes from the DES to FES cost/benefit analysis were based, noting how and where they were used.

Respectfully Submitted,

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cc: ASLB Judges
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