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U.S. Nuclear Regulatory Commission

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHIn 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 CONSUMERS POWER CO.

11/26/82

Pursuant to the Boards 10-29-82 Memorandum and Order and 10 CFR 2.740b and 2.741, Intervenor Stamiris makes the following requests of CPC. In the interest of consolidating related issues, interrogatories and document requests have been addressed together. Accordingly Intervenor expects responses to both interrogatories and document requests to be submitted together within the 30 days allowed for documents instead of the usual 14 days for interrogatories. Documents are defined according to Stamiris 8/30/82 description.

1. a. Explain in detail the manner and extent to which the change in Dow's low pressure steam reservation (#22 A-31 FES) from 1,400,000 to 1,800,000 lb. per hour affects any portion of CPC's input to the FES c/b (cost/benefit) analysis. Explain the effect upon:
 1. Replacement energy costs
 2. Reduced generating costs
 3. Increased lifetime capacity factor
 4. Any other factors
- b. When did Dow make this change in steam reservation?
- c. For what purpose was this change made as explained to CPC?

- d. Why does the FES increase in the steam for Dow not result in a decrease in the electrical capacity?
 - e. Provide documents on the change in the steam reservation and its effects as addressed in this question.
 - f. Include and denote which documents were provided to the NRC on this subject for their cost/benefit analysis.
2.
 - a. Define and differentiate between the terms "gross nameplate rating" and "design rating."
 - b. Give DES and FES "design ratings" and explain the reason for any changes suggested to the NRC.
 - c. Give the DES and FES "gross nameplate ratings" and explain the reason for any changes suggested.
 - d. Explain the basis for the suggested change between the DES 1310 MWe rating and the FES 1357 MWe (#107, A-48 FES, 6-5 DES and 6-3 FES).
 3.
 - a. Explain in detail the complete basis for the suggested change in the DES-FES lifetime capacity factors.
 - b. Include but do not limit (3a) explanation to effects of components cited in the #19, A-31 FES basis.
 - c. Provide documentation for this answer, including and denoting which documents were also provided to the NRC for their cost/benefit analysis.
 4.
 - a. Define, quantify, and explain in detail the meaning and impact of "Applicant's 12-14-81 load forecast revision" (#16, A-31 FES) for the cost/benefit analysis.
 - b. On what basis is this load forecast revised?
 - c. Provide documents regarding the 12-14-81 load forecast revision and its bases including and denoting which of these documents were also provided the NRC for their cost/benefit analysis.

5. a. Explain in detail the basis of the change in replacement energy costs suggested by CPC for the FES cost/benefit analysis. Include but do not limit this explanation to the following facets of replacement energy costs:
1. The extent and manner in which CPC takes account of existing coal and oil fired facilities currently placed on economy reserve.
 2. Why CPC maintains a 70% reliance on purchased power despite its DES to FES rise in cost (sub tables 2.1, p. 2-3 DES, A-32 FES).
 3. What electrical demand rates are used as a basis for CPC replacement energy estimates supplied to the NRC for the DES and FES cost/benefit analysis?
 4. What reserve margin percentages are used as a basis for CPC replacement energy estimates supplied to the NRC for DES and FES cost/benefit analysis.
 5. To what extent and in what manner is inflation taken into account as a basis for CPC replacement energy estimates supplied to the NRC for their c/b analysis.
 6. Explain the basis for any changes between DES and FES estimates or methodology if they exist in 3, 4, and 5 above.
 7. Compare the estimated replacement energy amounts to the projected electrical capacity of the Midland facility--explain any differences if they exist.
 8. The extent and manner in which capital or construction costs of projected replacement energy facilities have been taken into account.
- b. Provide documents regarding replacement energy costs as addressed in this question including and denoting which documents were provided to the NRC for their c/b analysis.
6. a. Explain in detail the basis for CPC's estimate of production costs provided to the NRC for their c/b analysis

- b. To what extent were operation and maintenance expenses related to soils remedial measures included regarding:
 - 1. Permanent plant dewatering system
 - 2. Pipe monitoring systems
 - 3. Structural monitoring systems (crack or stress analyses)
 - 4. Any other soil related measures
 - c. Provide an estimate of expenses (1-4 above) over the projected 40-year life of the plant and explain the basis for these estimates.
 - d. If the soil remedial O & M expenses (1-4 above) were not included in CPC submittals to the NRC for their cost/benefit analysis, explain and justify their omission.
 - e. Estimate when the soils remedial monitoring systems (1-4 above) will be completely installed--what their costs (equipment and installation) will be--and how these costs are taken into account.
7. Consumers comment #3 (A-28 FES) states, "CPC has recently revised plant and production cost data based on the latest cost forecasts."
- a. What is the latest cost forecast to which this statement refers, and when was it submitted to CPC?
 - b. Do the referenced cost forecasts of comment #3 represent the most recent cost forecasts from Bechtel that were available to CPC as of April 2, 1982? If not explain.
 - c. Have more recent cost forecasts been submitted to CPC by Bechtel since April 2, 1982?
 - d. Explain in detail the manner in which the "latest cost forecasts" were used to revise any plant and production cost data by CPC (comment #3) and submitted to the NRC for their cost/benefit analysis.

Respectfully Submitted,

Barbara Stamiris

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