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7 UNITED STATES OF AMERICA

8 NUCLEAR REGULATORY COMMISSION

9 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

10	In the Matter of)	DOCKET NOS. STN 50-528
	ARIZONA PUBLIC SERVICE)	STN 50-529
11	COMPANY, et al.,)	STN 50-530
)	
12	(Palo Verde Nuclear)	JOINT APPLICANTS' FIRST
	Generating Station, Units 1,)	SET OF NON-UNIFORM
13	2 and 3))	INTERROGATORIES TO WEST
)	VALLEY AGRICULTURAL
14)	PROTECTION COUNCIL, INC.

15 TO: WEST VALLEY AGRICULTURAL PROTECTION COUNCIL, INC. and
16 its attorneys.

17 Under authority of 10 C.F.R. §2.740(b) you are
18 hereby requested to answer in writing and under oath, within
19 thirty (30) days from the receipt hereof, the following
20 interrogatories:

22 INSTRUCTIONS FOR USE

- 23 A. All information is to be divulged which is in the pos-
24 session of the individual or corporate party, his at-
25 torneys, investigators, agents, employees, or other
26 representatives of the named party and his attorney.
- B. Where an individual interrogatory calls for an answer
which involves more than one part, each part of the

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- 1 answer should be clearly set out so that it is under-
2 standable.
- 3 C. Where the term "you," or "defendant" is used, it is
4 meant to include every individual party and separate
5 answers should be given for each person named as a
6 party, if requested.
- 7 D. A space has been provided on the Form of Interroga-
8 tories for your answer. Two copies are served here-
9 with. Complete all copies and serve a copy of each
10 separate counsel representation, retaining a copy in
11 your file. Attach a verification and certificate of
12 mailing.
- 13 E. In the event the space provided is not sufficient for
14 your answer to any of the questions, please attach a
15 separate sheet of paper with the additional informa-
16 tion.
- 17 F. These interrogatories are intended as continuing inter-
18 rogatories, requiring you to answer by supplemental
19 answer, setting forth any information within the scope
20 of the interrogatories as may be acquired by you, your
21 agents, attorneys, or representatives following your
22 original answers.

23 DEFINITIONS

24 The following definitions are applicable to all
25 Interrogatories contained herein:

- 26 A. Any pronoun shall be deemed to designate the masculine,
feminine or neuter gender, and singular or plural, as
in each case may be appropriate.
- B. "Any," "each" and "all" shall be read to be all inclu-
sive, and to require the enumeration of each and every
item of information or document responsive to the
interrogatory in which such term appears.
- C. "And" and "or" and any other conjunctions or disjunc-
tions used herein shall be read both conjunctively and
disjunctively so as to require the enumeration of all
information responsive to all or any part of each
interrogatory in which any conjunction or disjunction
appears.

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- 1 D. "Person" means an individual, firm, corporation, as-
2 sociation, organization or other entity.
- 3 E. "You" and "your" as used herein shall refer to the West
4 Valley Agricultural Protection Council, Inc., and to
5 any and all of its members, agents, representatives, or
6 employees, and unless otherwise indicated, shall be
7 read to include West Valley's attorneys.
- 8 F. "Document" as used herein means any physical thing
9 containing information, including without limitation of
10 the generality of the foregoing any affidavit, agree-
11 ment of any kind (or memorandum thereof), analysis,
12 application, appointment calendar, appraisal, assign-
13 ment, audit, bankbook, bank statement, bill, bill of
14 lading, bill of sale, blueprint, book of account,
15 bulletin, cancelled check, card, certificate (of any
16 kind), chart, check, checkbook, check stub, compilation
17 of data or statistics, computer input or output ma-
18 terial (including but not limited to any computer
19 program, printout or plotter output), computer storage
20 device (including but not limited to any magnetic tape,
21 paper tape, magnetic disk, magnetic card, punch card,
22 mass storage device, diskette, floppy disk, core
23 storage or other computer memory), contract, corre-
24 spondence (sent or received), data sheet, diagram,
25 diary, diploma, drawing, evaluation, examination or
26 examination results, film (whether or not developed),
financial statement, financing statement, forecast or
projection, form (whether or not filled out), graph,
instructions, instrument (including but not limited to
any negotiable or non-negotiable instrument), inven-
tory, invoice, ledger or ledger sheet, list, log or
logbook, manuscript, map, memorandum, message (in-
cluding but not limited to any report of any telephone
conversation, conference or other conversation),
microfilm, notebook, note or notes or summarization of
any communication (including but not limited to any
conversation, telephone conversation, personal inter-
view or conference), notes or summarization of any
meeting (including but not limited to any negotiation,
class, seminar, conference, rally, convention, lecture,
session or formal or informal discussion), outline,
painting, paper, patent or patent application, photo-
graph or photographic negative (including but not
limited to any x-ray, slide, movie or videotape),
plans, planning materials, preliminary drawing, prom-
issory note or other evidence of indebtedness, position
paper, prospectus, publication (including but not
limited to any book, booklet, circular, magazine,
newspaper, pamphlet or periodical), purchase order,

1 questionnaire, raw or uncompiled data or statistics,
2 receipt, recording of any kind (whether or not tran-
3 scribed), register, report, schedule, schematic,
4 scroll, specifications, statement, study, survey,
5 tablet, telegram (sent or received), telex, test or
6 test results, ticket or ticket stub, voucher, warrant,
7 working paper, writing, or other data compilation from
8 which information can be obtained or translated through
9 detection devices to reasonably usable form when trans-
10 lation is practicable or necessary, and includes any
11 original, draft (with or without notes or changes
12 thereon) or copy (with or without notes or changes
13 thereon) of any of the foregoing. Any such document
14 bearing on any portion thereof any mark (including but
15 not limited to initials, stamped indicia, comments or
16 notations of any character) not a part of the original
17 text or photographic reproduction thereof, is to be
18 considered as a separate document.

- 11 G. "Identify" as used herein with respect to a document
12 shall be read to require a statement of all of the fol-
13 lowing information relative to such document: (1)
14 title; (2) nature and subject matter; (3) date; (4)
15 author; (5) addressee; (6) file number or other identi-
16 fying mark or code; (7) location by room, building,
17 address, city and state; (8) identification of custo-
18 dian; and (9) whether or not it is claimed that such
19 document is privileged, and if so, the type of privi-
20 lege claimed and a statement of all the circumstances
21 which will be relied upon to support such claim of
22 privilege.
- 17 H. "Identify" as used herein with respect to any indivi-
18 dual shall be read to require a statement of all of the
19 following information pertaining to such individual:
20 (1) present home address; (2) present home telephone
21 number; (3) employer; (4) present or last known busi-
22 ness address; (5) business telephone number; (6) job
23 description; (7) title; and (8) employment history (if
24 any) with the party answering, including dates, job
25 descriptions and job titles.
- 22 I. "Identify" as used herein with respect to any entity
23 other than an individual shall be read to require a
24 statement of all of the following information relating
25 to such entity: (1) full name or title; (2) principal
26 place of business; (3) nature or type of entity; and
27 (4) its principal business.
- 25 J. "Identify" as used herein with respect to any conversa-
26 tion (including any telephone communication) or meeting

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shall be read to require a statement of all of the following information relating to such conversation or meeting: (1) the date on which it occurred; (2) the identity of each and every person who was present or who participated; (3) the place at which it occurred or, in the case of a telephone communication, the location of each party; and (4) a detailed statement of the substance of what was discussed or what actions were taken.

- K. "Petition" as used herein shall refer to the "Petition to Intervene and Request for Preparation of Supplemental or Revised Environmental Impact Statement, Hearing and Other Relief" dated October 13, 1982.
- L. "West Valley" as used herein shall refer to the West Valley Agricultural Protection Council, Inc.
- M. "PVNGS" as used herein shall refer to the Palo Verde Nuclear Generating Station.
- N. "Joint Applicants" as used herein shall refer to Arizona Public Service Company ("APS"), Salt River Project Agricultural Improvement and Power District, El Paso Electric Company, Southern California Edison Company, Public Service Company of New Mexico, and Southern California Public Power Authority.

INTERROGATORIES

1. In your Petition, you allege that West Valley is a non-profit corporation formed in 1982 by farmers in Maricopa County, Arizona. State the date upon which West Valley was incorporated, and identify the officers and directors of the corporation.

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2. In your Petition, you allege that West Valley has 56 farmer members. Identify the 56 members who comprise West Valley and state, for each, his or her address.

3. For each member named in response to the preceding interrogatory, state the precise legal description of the land owned and/or leased and/or operated by such member, using the UTM or Arizona Coordinate System to describe such property; also state the total number of acres owned and/or operated by each such member.

4. For each parcel of property described in answer to the preceding interrogatory, state whether you claim that such parcel, or any part thereof, will be affected or may potentially be affected by salt drift deposition from the PVNGS. If you claim that only a portion of any parcel listed herein will or may be affected, describe

1 specifically the part thereof which you claim will or may be
2 affected.

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8 5. For each parcel of property listed in answer
9 to the preceding interrogatory, state the amount of drift
10 per acre which you claim will be deposited thereon on a
11 daily, monthly and annual basis.

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17 6. Describe the precise method by which the
18 deposition figures given in response to the preceding inter-
19 rogatory were calculated. Include in your answer all facts,
20 assumptions, and calculations upon which such figures are
21 based.

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7. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

8. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 6.

9. For each parcel of land described in answer to Interrogatory No. 3, state whether the farmer member of West Valley owns such land, leases it, or farms it under any other form of ownership or control. If the farmer member leases the land described, state the name of the owner/lessor; if the farmer member does not own or lease such property, describe the relationship pursuant to which the farmer member operates the land in question.

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10. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

11. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 9.

12. For each parcel of land described in response to Interrogatory No. 3, indicate for each of the last ten years, the percentage of such acreage which was actually

1 planted in crops and further state for each of the last ten
2 years:

3 (a) The crop(s) which were planted on such
4 acreage, or any part thereof, and the number of acres which
5 were planted in each such crop.
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11 (b) For each crop identified in response to
12 subpart (a) of this interrogatory, state the approximate
13 date upon which each crop was planted, the approximate leaf-
14 out date of such crop and the harvest date thereof.
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20 (c) Define the yield (in pounds, bales,
21 bushels, etc. per acre) of each crop planted on each of the
22 parcels of property described in response to Interrogatory
23 No. 3.
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(d) As a continuation of the preceding sub-
parts of this interrogatory, state the market price per
harvest unit of the crops identified in subpart (a) above,
for each parcel of land listed in response to Interrogatory
No. 3.

(e) With respect to the information provided
in subpart (d) of this interrogatory, state the individual
or entity to whom the crop(s) or any part thereof was sold,
the date upon which the crop was sold and the means by which
the sale price was established.

13. Identify each person having knowledge, or
claiming to have knowledge, of the facts set forth in your
answer to the preceding interrogatory. As to each such

1 person, state the specific facts concerning which they have
2 knowledge or claim to have knowledge.
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8 14. Identify each and every document which refers
9 or relates in any way to the facts set forth in your answer
10 to Interrogatory No. 12.
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16 15. For each parcel of property listed in re-
17 sponse to Interrogatory No. 3, and for each crop which you
18 claim was grown thereon during the past ten years, identify
19 the irrigation method used for each such crop and the fre-
20 quency with which such crop was irrigated. Your answer
21 should include, but not be limited to, the total quantity of
22 water applied per acre per day, per month, and per growing
23 season, and the source of the irrigation water.
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16. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

17. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 15.

18. Describe the water quality (i.e., the content in parts per million (ppm)), for the irrigation water referred to in Interrogatory No. 15, of any minerals, nutrients, or other solids, including -- but not limited to -- salt; further state the source of your information regarding the water quality described herein.

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19. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

20. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 18.

21. For each crop planted on each parcel of property described in response to Interrogatory No. 3, and for each of the last ten years, identify any and all crop and/or soil treatments applied to the crop at any time during its

1 growing season. Your answer should include, but not be
2 limited to, a description of all herbicides, pesticides,
3 fertilizers, soil leaching practices, etc., administered to
4 the crop and/or to the soil, and a description of the phase
5 of the crop's life at which such practices were adminis-
6 tered. Further include in your answer, the purpose of such
7 practice, the method of administration, the frequency
8 thereof, and the approximate cost of each administration.
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14 22. Identify each person having knowledge, or
15 claiming to have knowledge, of the facts set forth in your
16 answer to the preceding interrogatory. As to each such
17 person, state the specific facts concerning which they have
18 knowledge or claim to have knowledge.
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24 23. Identify each and every document which refers
25 or relates in any way to the facts set forth in your answer
26 to Interrogatory No. 21.

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24. Your Petition alleges that West Valley members produce ninety six million dollar's (\$96,000,000) worth of agricultural products per year. Describe in precise detail the method by which you arrived at the \$96,000,000 figure and the year or growing season(s) to which such figure applies. Also state the alleged value of crops grown by each farmer member for each of the last ten years, or by his predecessor if the farmer member has not owned, leased or operated his land for the last ten years.

25. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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26. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 24.

27. Your Petition (paragraph 1, pg. 2) alleges that all West Valley members are located "within the area likely to be affected" by salt deposition. Give the legal description, the owner of each parcel thereof, and the total acreage included, in your definition or calculation of the area which you claim will be affected.

28. Contention I.A.(i) of the Petition alleges that a "recent study" has shown that the "sampling method" utilized by the vendor in determining the drift ratio of the recirculating water in the cooling towers "can easily be in

1 error by greater than 100 percent." Identify the recent
2 study to which you are referring, the author thereof, the
3 date of its preparation and the precise conclusions set
4 forth therein which you claim support the above allegation.
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10 29. Define the sampling method which you claim
11 was utilized by the vendor and which you allege can result
12 in the error of greater than 100 percent.
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18 30. Identify each and every fact, premise, theory
19 or conclusion upon which you rely to support the allegation
20 that the vendor's sampling method can result in a drift
21 ratio which can be in error by greater than 100 percent.
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31. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

32. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 30.

33. Describe in detail the sampling method which you allege should have been used in order to reduce or eliminate the potential error which you allege in contention I.A.(i).

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34. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

35. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 33.

36. Contention I.A.(ii) alleges that the sampling methods utilized in determining the drift ratio failed to recognize wind effects within the fill and drift elimination system. Describe precisely the wind effects which you claim were not recognized and further describe the precise manner in which you claim such wind effects will impact upon the drift ratio.

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37. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

38. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 36.

39. Contention 1.A.(iv) alleges that the ER, EIS and sampling methods utilized in determining the drift ratio failed to measure "water distribution canal drift losses."

1 Describe in detail the drift losses which you claim will
2 arise from the water distribution canal and the precise
3 manner in which such losses will contribute or otherwise
4 affect the drift ratio.
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10 40. Identify each person having knowledge, or
11 claiming to have knowledge, of the facts set forth in your
12 answer to the preceding interrogatory. As to each such
13 person, state the specific facts concerning which they have
14 knowledge or claim to have knowledge.
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20 41. Identify each and every document which refers
21 or relates in any way to the facts set forth in your answer
22 to Interrogatory No. 39.
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2 42. Contention I.B.(iii) alleges that studies at
3 the Chalk Point, Maryland power plant showed a "sizeable in-
4 crease" in salt deposition occurring after the plant had
5 been in operation for six years. Identify each and every
6 fact, premise, theory or conclusion and describe all data
7 and information, which you allege supports that allegation.
8 Your answer should include, but not be limited to, a de-
9 scription of the makeup water quality, tower operation,
10 meteorology (including temperature and icing conditions),
11 deposition pattern and all other pertinent data which you
12 claim contributed to or otherwise affected the increase in
13 the salt deposition which you allege occurred after six
14 years of operation.

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20 43. Identify each person having knowledge, or
21 claiming to have knowledge, of the facts set forth in your
22 answer to the preceding interrogatory. As to each such
23 person, state the specific facts concerning which they have
24 knowledge or claim to have knowledge.

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44. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 42.

45. Contention I.B.(iv) describes certain cooling tower deterioration problems which you claim will affect salt emissions. Identify each and every "problem" which you claim will affect such changes and describe the precise manner in which such problems will contribute to or otherwise affect the salt emissions.

46. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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47. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 45.

48. Contention I.C. alleges that the cooling tower drift model utilized at PVNGS underpredicts salt deposition to off-site properties by a factor of ten or more. State each and every fact, theory, premises or conclusion upon which you rely to support that allegation.

49. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such

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person, state the specific facts concerning which they have knowledge or claim to have knowledge.

50. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 48.

51. Contention I.C.(iii) alleges that the predictions for the PVNGS do not exhibit the "usual salt deposition patterns". Describe what you claim are "usual" salt deposition patterns and further describe the precise manner in which you claim the PVNGS predictions deviate from such patterns.

1 52. Identify each person having knowledge, or
2 claiming to have knowledge, of the facts set forth in your
3 answer to the preceding interrogatory. As to each such
4 person, state the specific facts concerning which they have
5 knowledge or claim to have knowledge.
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11 53. Identify each and every document which refers
12 or relates in any way to the facts set forth in your answer
13 to Interrogatory No. 51.
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19 54. Describe all data, reports, statistics, or
20 other information upon which you rely to support your def-
21 inition of the "usual pattern" referred to in contention
22 I.C., including all meteorological data, predictive documen-
23 tation, tower operating characteristics and field verifica-
24 tion which supports your contention.
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55. Contention I.C.(ii) alleges that the PVNGS model cannot be applied to the Palo Verde region and be expected to provide accurate results without some "verifying experience". Describe precisely what you mean by the term "verifying experience" and further describe the manner in which you claim such verification would contribute to the accuracy of the model.

56. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

1 57. Identify each and every document which refers
2 or relates in any way to the facts set forth in your answer
3 to Interrogatory No. 55.
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9 58. Contention I.C.(iv)(a) alleges that the PVNGS
10 model assumes that drift droplets are released "too high".
11 State each and every fact, theory, premise or conclusion
12 upon which you base that allegation, and further describe
13 the elevation at which you claim such release would be more
14 accurate.
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20 59. Identify each person having knowledge, or
21 claiming to have knowledge, of the facts set forth in your
22 answer to the preceding interrogatory. As to each such
23 person, state the specific facts concerning which they have
24 knowledge or claim to have knowledge.
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60. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 58.

61. Contention I.C.(iv)(b) alleges that the PVNGS model fails to consider "turbulent diffusion" of the drift droplets. State each and every fact, theory, premise or conclusion upon which you base that allegation; include in your answer a precise description of the turbulent diffusion which you claim should have been included in the model, and the manner in which such diffusion affects the drift deposition which is the subject of this contention.

62. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your

1 answer to the preceding interrogatory. As to each such
2 person, state the specific facts concerning which they have
3 knowledge or claim to have knowledge.
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9 63. Identify each and every document which refers
10 or relates in any way to the facts set forth in your answer
11 to Interrogatory No. 61.
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17 64. Contention I.C.(iv)(d) alleges that the PVNGS
18 model fails to consider the "effect of plume trapping by
19 elevated temperature inversions". Describe precisely and in
20 detail the effect which the alleged plume trapping has on
21 the dispersion and deposition of the drift which is the
22 subject of this contention. Include in your answer the
23 source, frequency, and other relevant characteristics of the
24 elevated temperature inversions which you allege cause or
25 contribute to plume trapping.
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65. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

66. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 64.

67. Contention I.C.(v) alleges that salt drift predictions for the PVNGS are low compared to "another study" of a "similar tower". Describe the study to which you are referring and state the precise factual conclusions

1 contained therein which you claim support your allegation
2 that the PVNGS predictions are low, including comparisons
3 of drift deposition as a function of distance from the
4 respective towers.
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9 68. As a continuation of the preceding interroga-
10 tory, describe the "similar tower" referred to and include
11 each and every similarity which you claim contributes to or
12 facilitates a valid comparison of the drift deposition pre-
13 dictions for such tower to the drift deposition predictions
14 for PVNGS.
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20 69. Identify each person having knowledge, or
21 claiming to have knowledge, of the facts set forth in your
22 answer to the preceding interrogatory. As to each such
23 person, state the specific facts concerning which they have
24 knowledge or claim to have knowledge.
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70. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 68.

71. Contention I.C.(ii) uses the term "vastly different" in reference to the climatic conditions at Palo Verde. Describe the specific climatic or meteorological factors which you allege are significant to the ability of a drift model to accurately predict salt drift deposition. Include in your answer the magnitude or scope of the differences in these significant climatic parameters that you claim would make a model with verifying experience in one region unacceptable in terms of its predictive accuracy in another climatic region.

1 72. Identify each person having knowledge, or
2 claiming to have knowledge, of the facts set forth in your
3 answer to the preceding interrogatory. As to each such
4 person, state the specific facts concerning which they have
5 knowledge or claim to have knowledge.
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11 73. Identify each and every document which refers
12 or relates in any way to the facts set forth in your answer
13 to Interrogatory No. 71.
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19 74. Contention I.C.(vi) alleges that a "properly
20 conducted salt drift analysis" would show the PVNGS model to
21 be unreliable by a factor of from ten to seventy. Describe
22 in detail each and every step, facet, assumption and compo-
23 nent of the properly conducted salt drift analysis which you
24 claim would show the PVNGS model to be unreliable.
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75. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

76. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 74.

77. Contention I.D.(i) alleges that "at times" the cooling tower salinity of the Palo Verde cooling towers will be "higher than assumed in the model." With reference to that allegation, state:

1 (a) The "times" at which, or during which,
2 you allege the cooling water salinity of the tower will be
3 higher.

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9 (b) Each and every fact upon which you base
10 your determination or calculation of such "times".

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16 (c) The salinity levels which you claim will
17 occur, and the magnitude by which they will exceed those
18 levels assumed in the model. State each and every fact upon
19 which you base this allegation.

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25 (d) Describe what you claim to be the causes
26 of the higher salinity concentrations referred to in sub-

1 part (c) above, and the duration of the higher levels that
2 you allege will be experienced.
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8 78. Identify each person having knowledge, or
9 claiming to have knowledge, of the facts set forth in your
10 answer to the preceding interrogatory. As to each such
11 person, state the specific facts concerning which they have
12 knowledge or claim to have knowledge.
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18 79. Identify each and every document which refers
19 or relates in any way to the facts set forth in your answer
20 to Interrogatory No. 77.
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80. Contention I.D.(ii) alleges that records from the Buckeye Irrigation Company show that some water samples taken from the Phoenix sewage effluent which will be utilized at the PVNGS contain twice the salt content listed in the ER and the EIS. Describe each and every "record" which you are relying on to support that allegation and further state:

(a) The date upon which each and every sample referenced in such records was collected.

(b) The person or persons responsible for the collection of the sample.

(c) The collection methods utilized to obtain the samples.

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(d) The tests, calculations, or other methods used to determine the salt content of such samples.

(e) The precise location at which such samples were drawn from the Phoenix Sewage effluent.

81. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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82. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 80.

83. Contention I.D.(iii) alleges that the cooling water source is likely to change over the life of the plant. State each and every fact, theory, premise or conclusion upon which you rely to support that allegation.

84. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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85. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 83.

86. Contention I.D.(iii) alleges that the change to which that contention refers will lead to "much higher initial salt concentrations" than shown in the model. Identify each and every fact, theory, premise or conclusion upon which you rely to support that allegation including specifically the magnitude of the concentration which you allege will result.

87. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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88. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 86.

89. Identify each and every fact, calculation, study, test, or other pertinent data upon which you rely to support the allegation in contention I.E.(i) that blow off from the evaporation ponds will average 23,000 pounds of salt per day.

90. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such

1 person, state the specific facts concerning which they have
2 knowledge or claim to have knowledge.
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9 91. Identify each and every document which refers
10 or relates in any way to the facts set forth in your answer
11 to Interrogatory No. 89.
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18 92. Identify each and every fact, study, test,
19 calculation, or other pertinent data upon which you rely to
20 support the allegation in contention F that the salt deposi-
21 tion from spray ponds may exceed the deposition from the
22 cooling towers.
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93. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

94. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 92.

95. Contention I.F.(ii) alleges that the ER unrealistically expects refueling intervals for each tower to be one month per year when experience at most other similar stations has shown that a larger value would be more realis-

1 tic. Identify each and every station to which that allega-
2 tion refers, the dates of refueling outages at each such
3 station and the "larger value" which you allege would be
4 more realistic for refueling intervals.
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10 96. Identify each person having knowledge, or
11 claiming to have knowledge, of the facts set forth in your
12 answer to the preceding interrogatory. As to each such
13 person, state the specific facts concerning which they have
14 knowledge or claim to have knowledge.
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20 97. Identify each and every document which refers
21 or relates in any way to the facts set forth in your answer
22 to Interrogatory No. 95. *
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98. Identify each and every fact upon which you rely for your selection of the "larger value" referred to in contention I.F.(ii).

99. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

100. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 98.

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101. Identify each and every fact theory, premise or conclusion upon which you rely to support the allegation in contention I.F.(iii) that the drift distributions from the spray ponds are unreliable and that the vendor's drift source term and drift transport model can be expected to be seriously in error by as much as a factor of ten. Include in your answer each and every study, test, calculation, report, or other source of pertinent data which supports such allegation.

102. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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103. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 101.

104. Define the term "drift ratio" as used in contention I.G.(i).

105. Describe each and every item or component of cooling tower deterioration to which you refer in contention I.G.(ii) and which you claim will affect the drift ratio utilized by the Applicant. Include specifically the date upon which you claim each such component or item of deterioration can be expected to begin, the magnitude of such deterioration, the precise aspect of the tower which you claim will suffer such deterioration, and the precise manner in which such deterioration will contribute to or otherwise affect the drift ratio.

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106. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

107. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 105.

108. Identify each and every fact, theory, premise or conclusion upon which you rely to support the allegation in contention I.G.(i) that drift ratio measurements may be in error by a factor of more than 100 percent.

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109. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

110. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 108.

111. Identify each and every fact, theory, premise or conclusion upon which you rely to support the allegation

1 in contention I.G.(iii) that the cooling tower drift model
2 may be in error by a factor of ten to seventy or more.
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8 112. Identify each person having knowledge, or
9 claiming to have knowledge, of the facts set forth in your
10 answer to the preceding interrogatory. As to each such
11 person, state the specific facts concerning which they have
12 knowledge or claim to have knowledge.
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18 113. Identify each and every document which refers
19 or relates in any way to the facts set forth in your answer
20 to Interrogatory No. 111.
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114. Contention II.A. alleges that in other situations where cooling tower emissions might have had the potential to adversely affect surrounding croplands, other applicants have conducted "careful assessments" of the impact of the cooling towers on such crops. Identify each and every report, test, measurement, calculation, prediction, or other pertinent data which you allege is a component of such a "careful assessment".

115. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

116. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 114.

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117. Contention II.A. alleges that there is a "far greater risk" of crop damage in the instant situation. Identify each and every fact, theory, premise or conclusion upon which you rely to support that allegation.

118. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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119. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 117.

120. Identify the data used to establish the history of rain events in the PVNGS region to which you refer in contention III.A.(i).

121. Define the term "PVNGS region" as used in contention III.A.(i).

122. Contention III.A.(i) alleges that it is "unlikely" that the rain events in the PVNGS region would remove salts accumulated on crop leaves. Identify each and

1 every fact, theory, premise or conclusion upon which you
2 rely to support that allegation.
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8 123. Identify each person having knowledge, or
9 claiming to have knowledge, of the facts set forth in your
10 answer to the preceding interrogatory. As to each such
11 person, state the specific facts concerning which they have
12 knowledge or claim to have knowledge.
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18 124. Identify each and every document which refers
19 or relates in any way to the facts set forth in your answer
20 to Interrogatory No. 122.
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125. Your contention III.A.(ii) claims that the climatic conditions at the PVNGS will "wet the leaves of crops in a manner" that will dissolve much of the salt deposited on the leaves. Describe precisely the manner in which you claim the climatic conditions will effect such dissolution, and further identify each and every fact, theory, premise or conclusion upon which you rely to support that allegation.

126. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

1 127. Identify each and every document which refers
2 or relates in any way to the facts set forth in your answer
3 to Interrogatory No. 125.
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9 128. Contention III.A.(ii) uses the phrase "much
10 of the salt". Describe precisely what is meant by that
11 phrase and further describe the precise manner in which you
12 arrived at the level or figure which you claim will be dis-
13 solved.
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19 129. Identify each person having knowledge, or
20 claiming to have knowledge, of the facts set forth in your
21 answer to the preceding interrogatory. As to each such
22 person, state the specific facts concerning which they have
23 knowledge or claim to have knowledge.
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130. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 128.

131. Identify each and every fact, theory, premise or conclusion upon which you rely to support the allegation in contention III.A.(ii) that climatic conditions will cause movement and concentration of salt along the leaf margins. Further, identify the characteristics and causes of such movements and concentrations.

132. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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133. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 131.

134. Define the terms general "chlorosis" and "necrosis" as used in your contention III.A.(ii).

135. Identify each and every fact, theory, premise or conclusion upon which you rely to support the allegation in contention III.A.(i) that movement and concentrations of salts along the leaf margins will cause chlorosis and necrosis. Include in your answer the precise manner in

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which you claim such movements and concentrations will result in chlorosis and necrosis.

136. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

137. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 135.

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138. Describe the significance of "leaf margins" in connection with your assessment of potential salt damage to crops.

139. In addition to the leaf margins which you claim will be damaged by the potential salt drift deposition, are there any other portions of the plants (i.e., leafs, stems, roots, etc.) that you allege are subject to plant degeneracy or disease as the result of salt deposition. _____ If your answer to this interrogatory is in the affirmative, please state:

(a) Each and every part or portion of such plants which you claim are subject to deterioration or disease.

(b) The precise disease or other deterioration which you claim may or can be caused by salt deposition.

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140. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

141. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 139.

142. Contention III.A.(iii) alleges that studies at Chalk Point, Maryland showed much higher injury to crops during a drought year than had been observed during previous

1 years. Identify the precise study, and each factual con-
2 clusion contained therein, upon which you rely to support
3 the allegation of this contention.
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9 143. Contention III.A.(iv) alleges that the salt
10 accumulation on leaves resulting from the operation of the
11 PVNGS would cause plants to exhibit symptoms of general
12 drought stress. Identify each and every fact, theory,
13 premise or conclusion upon which you rely to support that
14 allegation. Include specifically the level of accumulation
15 which you believe is necessary to cause plants to exhibit
16 symptoms of general drought stress; further describe pre-
17 cisely what is meant by the term "general drought stress",
18 and the manner in which such stress affects or impacts upon
19 the plant.
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25 144. Identify each person having knowledge, or
26 claiming to have knowledge, of the facts set forth in your

1 answer to the preceding interrogatory. As to each such
2 person, state the specific facts concerning which they have
3 knowledge or claim to have knowledge.
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9 145. Identify each and every document which refers
10 or relates in any way to the facts set forth in your answer
11 to Interrogatory No. 143.
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17 146. Describe the specific difference, if any,
18 between "general drought stress" and the condition which you
19 claim will result from salt deposition.
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25 147. Can injury caused by "general drought stress"
26 be distinguished from injury caused by salt deposition?

1 _____. If your answer to this interrogatory is in the af-
2 firmative, describe the specific differences in the injuries
3 or conditions, and further describe each and every test,
4 calculation, or measurement which is used to determine the
5 source of a particular plant's injury or disease.

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11 148. Identify each person having knowledge, or
12 claiming to have knowledge, of the facts set forth in your
13 answer to the preceding interrogatory. As to each such
14 person, state the specific facts concerning which they have
15 knowledge or claim to have knowledge.

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21 149. Identify each and every document which refers
22 or relates in any way to the facts set forth in your answer
23 to Interrogatory No. 147.

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3 150. Contention III.B.(i) states that "recent
4 studies" have established that aerosol deposition of salts
5 from cooling towers can harm agricultural crops. Identify
6 each and every "recent study" to which that contention
7 refers, including the authors, dates of preparation, and
8 each and every fact recited therein which you claim supports
9 the allegation of contention III.B.(i).
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15 151. Contention III.B.(i)(b) states that certain
16 studies have established that aerosol salt deposition can
17 harm a "variety of crops" at "comparatively low levels," and
18 that "high enough deposition levels" can harm virtually all
19 crops. With reference to that allegation, state:

20 (a) The crops included in your definition of
21 the "variety of crops" which you claim can be damaged by
22 comparatively low levels of salt deposition. For each and
23 every crop listed, identify the facts, theories, premises,
24 or contentions upon which you rely to support the allegation
25 that such crop can be so damaged, including each and every
26 study, report measurement, or test upon which you rely.

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(b) Define the phrase "comparatively low levels" in the context of each specific crop alleged to be harmed.

(c) Define the phrase "high enough deposition levels" which you allege can harm "virtually all crops."

152. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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153. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 151.

154. Contention III.B.(i)(c) state that certain studies have established that a generating station much smaller and utilizing less saline water than PVNGS caused extensive salt damage to native plants growing in similar climactic and soil conditions. With reference to that allegation, state:

(a) The name and location of the generating station to which the above allegation refers, including the factual basis upon which you allege that such station was "much smaller" than PVNGS.

1
2 (b) Each and every fact, theory, premise or
3 conclusion upon which you rely to support the allegation
4 that such station utilized less saline water than PVNGS,
5 including the precise amount (in terms of both water volume
6 and salinity concentrations) of saline water that you claim
7 was utilized.
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13 (c) The precise nature and extent of the
14 "extensive salt damage" referred to in contention
15 III.B.(i)(c).
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21 (d) The native plants which you allege were
22 damaged.
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(e) Each and every fact upon which you rely to support the allegation that the plants damaged by the allegedly smaller station referred to in contention III.B.(i)(c) were grown in similar climatic and soil conditions. Your answer should include, but not be limited to, a description of the meteorological data upon which you rely to support the claim that the climatic conditions were similar, and a description of the soil types which you claim were similar.

155. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

1 156. Identify each and every document which refers
2 or relates in any way to the facts set forth in your answer
3 to Interrogatory No. 154.
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9 157. Contention III(B)(ii) alleges that salt
10 injury to cotton could cause a reduction in the number of
11 bolls per plant and thus a reduction in crop yields. Iden-
12 tify each and every fact, theory, premise or conclusion upon
13 which you rely to support that allegation, including spe-
14 cifically in your answer, the following:

15 (a) The nature and level of salt injury
16 which you claim would be necessary to effect a reduction in
17 the number of bolls per plant.
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23 (b) The precise reduction in the "number of
24 bolls" per plant that you claim would be caused by such
25 injury.
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(c) The precise reduction, by percentage or by yield per acre, which you claim would be caused by such salt injury.

158. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

159. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 157.

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160. Contention III(B)(ii) further alleges that salt injury would result in a reduction in leaf area caused by necrosis induced salt injury, reducing the photosynthetic capacity of the plant and reducting the plant's ability to assimilate cellulose fibers. Identify each and every fact, theory premise or conclusion upon which you rely to support that allegation, including specifically, any tests, studies, or calculations upon which you rely to support said allegation.

161. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

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162. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 160.

163. Contention III(C) alleges that salt deposition from the PVNGS will occur at levels sufficient to cause harm to surrounding agricultural crops. State precisely the level of salt deposition which you allege is "sufficient to cause harm", and the precise nature of the harm which you allege will be caused. Identify each and every fact, theory, premise or conclusion upon which you rely to support this allegation.

164. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such

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person, state the specific facts concerning which they have knowledge or claim to have knowledge.

165. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 163.

166. Identify the studies to which you refer in contention III.C.(i). Include in your answer the identification of the "certain plants" which were the apparent subject of such study; further identify the specific meteorological data upon which you rely to support the allegation that a heavy rainfall washed all salt from the crops on the average of once a week.

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167. Identify each person having knowledge, or claiming to have knowledge, of the facts set forth in your answer to the preceding interrogatory. As to each such person, state the specific facts concerning which they have knowledge or claim to have knowledge.

168. Identify each and every document which refers or relates in any way to the facts set forth in your answer to Interrogatory No. 166.

169. Contention III.C.(ii) alleges that in the area surrounding the PVNGS, deposition levels of 2-4 lbs. per acre per week will occur near the plant. Define precisely the area which you include in your definition of "near the plant." Identify each and every fact, theory,

1 premise or conclusion upon which you rely to support the
2 allegation that levels of 2-4 lbs. per acre per week will
3 occur in such area.
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9 170. Identify each person having knowledge, or
10 claiming to have knowledge, of the facts set forth in your
11 answer to the preceding interrogatory. As to each such
12 person, state the specific facts concerning which they have
13 knowledge or claim to have knowledge.
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19 171. Identify each and every document which refers
20 or relates in any way to the facts set forth in your answer
21 to Interrogatory No. 169.
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1 172. Contention III(C)(iii) uses the phrase "in
2 areas further from the plant." Define precisely the area
3 included in your definition of such areas, and further
4 define the level of deposition to which you believe such
5 area will be potentially subject.
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11 173. The memorandum report of Dr. Edward A. Davis,
12 attached to your Petition as Exhibit "A", states on page 1,
13 that "[t]here are several indications that the model used
14 for the Palo Verde study underpredicts salt deposition."
15 Define each and every "indication" referred to in that
16 statement which leads you to the conclusion that the Palo
17 Verde model under predicts salt deposition. For each
18 "indication" listed, state the following:

19 (a) Each and every fact, theory, premise or
20 conclusion upon which you rely to support the alleged indi-
21 cation.
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1 (b) The source of such indication.
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7 (c) Each and every study, test, or other
8 such report which supports, verifies, or lends credence to
9 the facts set forth in response to this interrogatory.
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15 174. Dr. Davis' report, at page 6, states that Dr.
16 Davis reviewed pertinent sections of NRC, APS and related
17 documents [references 1-4 of the report] in order to evalu-
18 ate the modeling of the drift deposition. For each separate
19 document reviewed in connection with such evaluation, state
20 the specific "pertinent sections" of the document which were
21 reviewed and relied upon by Dr. Davis in reaching his con-
22 clusions.
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175. Dr. Davis' report at page 6, further indicates that "several persons connected with the project have been contacted to discuss various details of the model." With reference to that statement, identify the following:

(a) Each person contacted.

(b) The individual who contacted each person, if other than Dr. Davis.

(c) The manner in which and the place at which each person was contacted.

1 (d) The substance of each and every conver-
2 sation held with each individual listed in response to sub-
3 part (a) hereof.
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10 (e) Whether or not any notes, memorandum or
11 other written memorializations were made regarding the con-
12 versations referred to above. _____ If your answer to sub-
13 part (e) hereof is in the affirmative, identify the custo-
14 dian of such reports, notes, or other memorializations.
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20 176. Dr. Davis' report, at page 7, states that he
21 was provided with certain information regarding modeling
22 parameters from individuals connected with the Marley Com-
23 pany. Dr. Davis further states that "the values provided
24 are considerably different than those used in the APS En-
25 vironmental Report on Palo Verde." With regard to that
26 allegation, state:

1 (a) A description of the values provided by
2 Marley.

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8 (b) The specific values in the APS Environ-
9 mental Report to which the Marley data was compared.

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15 (c) The precise extent of the difference
16 referred to in Dr. Davis' report, at page 7.

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22 (d) The significance of the difference which
23 Dr. Davis alleges exists between the Marley and the AFS
24 data.

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177. Dr. Davis' report states at page 8, that drift from the spray ponds is emitted from a much lower height and could cause more off-site salt deposition than the towers, depending on the cooling water salinity. Identify each and every fact, theory, premise or conclusion upon which West Valley relies to support that statement, including specifically, but not limited to, the level of cooling water salinity, the height of release, and the drift droplet size distribution upon which the truth of the statement is dependent.

178. Dr. Davis' report at page 8, further states that in relation to potential dust blowoff from the evaporation ponds, "rough estimates based on information in references 7 and 8 indicate that this source could exceed the cooling tower as its salt source as the ponds grow in size." Appennix IIA of Dr. Davis' report purports to provide details of this estimate. With specific reference to Appendix IIA, state the following:

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(a) The identity of the individual who developed, or the source of, the mathematical equation set forth in Appendix IIA.

(b) The manner in which the "threshold value of 12 mph" for wind speed was determined, calculated or otherwise arrived at.

(c) The manner in which the "typical value of erodibility" 50 to 200 tons/acre-year was determined, calculated or otherwise determined.

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(d) The manner in which you arrived at the figure of 20% for the frequency of sufficiently high wind speed.

179. List each and every communication relating in any way to the matters or allegations referred to in Contention I, between any West Valley member, agent, investigator, or attorney and the Applicant or its agents or employees, stating for each such communication:

(a) The date it occurred.

(b) Whether it was verbal or written.

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(c) The name and last known address of the person initiating the communication.

(d) The name and last known address of the person receiving the communication.

(e) The substance of the conversation and the particular allegation(s) of Contention I to which it related.

(f) If written, the name and address of the present custodian of a copy of each such communication.

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(g) If verbal:

(1) Whether by personal conversation or
by telephone.

(2) The names of any persons present
during the communications.

(3) Whether any notice or memos were
made of the communication and, if so, by whom and the name
and address of the present custodian of each such record.

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180. List each and every communication relating in any way to the matters or allegations referred to in Contention II, between any West Valley member, agent, investigator, or attorney and the Applicant or its agents or employees, stating for each such communication:

(a) The date it occurred.

(b) Whether it was verbal or written.

(c) The name and last known address of the person initiating the communication.

(d) The name and last known address of the person receiving the communication.

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(e) The substance of the conversation and the particular allegation(s) of Contention II to which it related.

(f) If written, the name and address of the present custodian of a copy of each such communication.

(g) If verbal:
(1) Whether by personal conversation or by telephone.

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(2) The names of any persons present during the communications.

(3) Whether any notice or memos were made of the communication and, if so, by whom and the name and address of the present custodian of each such record.

181. List each and every communication relating in any way to the matters or allegations referred to in Contention III, between any West Valley member, agent, investigator, or attorney and the Applicant or its agents or employees, stating for each such communication:

(a) The date it occurred.

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(b) Whether it was verbal or written.

(c) The name and last known address of the person initiating the communication.

(d) The name and last known address of the person receiving the communication.

(e) The substance of the conversation and the particular allegation(s) of Contention III to which it related.

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(f) If written, the name and address of the present custodian of a copy of each such communication.

(g) If verbal:

(1) Whether by personal conversation or by telephone.

(2) The names of any persons present during the communications.

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(3) Whether any notice or memos were made of the communication and, if so, by whom and the name and address of the present custodian of each such record.

182. List each and every communication relating in any way to the matters or allegations set forth in Contention I, between any West Valley members and/or between any West Valley member and any agent of West Valley (excluding only its attorney), stating for each such communication:

(a) The date it occurred.

(b) Whether it was verbal or written.

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(c) The name and last known address of the person initiating the communication.

(d) The name and last known address of the person receiving the communication.

(e) The substance of the conversation and the particular allegation(s) of Contention I to which it related.

(f) If written, the name and address of the present custodian of a copy of each such communication.

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(g) If verbal:

(1) Whether by personal conversation or
by telephone.

(2) The names of any persons present
during the communications.

(3) Whether any notice or memos were
made of the communication and, if so, by whom and the name
and address of the present custodian of each such record.

1 183. List each and every communication relating in
2 any way to the matters or allegations set forth in Contention II,
3 between any West Valley members and/or between any
4 West Valley member and any agent of West Valley (excluding
5 only its attorney), stating for each such communication:

6 (a) The date it occurred.

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11 (b) Whether it was verbal or written.

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17 (c) The name and last known address of the
18 person initiating the communication.

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24 (d) The name and last known address of the
25 person receiving the communication.
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(e) The substance of the conversation and the particular allegation(s) of Contention II to which it related.

(f) If written, the name and address of the present custodian of a copy of each such communication.

(g) If verbal:
(1) Whether by personal conversation or by telephone.

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(2) The names of any persons present during the communications.

(3) Whether any notice or memos were made of the communication and, if so, by whom and the name and address of the present custodian of each such record.

184. List each and every communication relating in any way to the matters or allegations set forth in Contention III, between any West Valley members and/or between any West Valley member and any agent of West Valley (excluding only its attorney), stating for each such communication:

(a) The date it occurred.

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(b) Whether it was verbal or written.

(c) The name and last known address of the person initiating the communication.

(d) The name and last known address of the person receiving the communication.

(e) The substance of the conversation and the particular allegation(s) of Contention III to which it related.

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(f) If written, the name and address of the present custodian of a copy of each such communication.

(g) If verbal:

(1) Whether by personal conversation or by telephone.

(2) The names of any persons present during the communications.

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(3) Whether any notice or memos were made of the communication and, if so, by whom and the name and address of the present custodian of each such record.

185. List each and every communication relating in any way to the matters or allegations referred to in Contention I, between any West Valley member or agent of West Valley, and any person not referred to in Interrogatories Nos. 179 or 182, stating for each such communication:

(a) The date it occurred.

(b) Whether it was verbal or written.

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(c) The name and last known address of the person initiating the communication.

(d) The name and last known address of the person receiving the communication.

(e) The substance of the conversation and the particular allegation(s) of Contention I to which it related.

(f) If written, the name and address of the present custodian of a copy of each such communication.

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(g) If verbal:

(1) Whether by personal conversation or
by telephone.

(2) The names of any persons present
during the communications.

(3) Whether any notice or memos were
made of the communication and, if so, by whom and the name
and address of the present custodian of each such record.

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186. List each and every communication relating in any way to the matters or allegations referred to in Contention II, between any West Valley member or agent of West Valley, and any person not referred to in Interrogatories Nos. 180 or 183, stating for each such communication:

(a) The date it occurred.

(b) Whether it was verbal or written.

(c) The name and last known address of the person initiating the communication.

(d) The name and last known address of the person receiving the communication.

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(e) The substance of the conversation and the particular allegation(s) of Contention II to which it related.

(f) If written, the name and address of the present custodian of a copy of each such communication.

(g) If verbal:
(1) Whether by personal conversation or by telephone.

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(2) The names of any persons present during the communications.

(3) Whether any notice or memos were made of the communication and, if so, by whom and the name and address of the present custodian of each such record.

187. List each and every communication relating in any way to the matters or allegations referred to in Contention III, between any West Valley member or agent of West Valley, and any person not referred to in Interrogatories Nos. 181 or 184, stating for each such communication:

(a) The date it occurred.

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(b) Whether it was verbal or written.

(c) The name and last known address of the person initiating the communication.

(d) The name and last known address of the person receiving the communication.

(e) The substance of the conversation and the particular allegation(s) of Contention III to which it related.

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(f) If written, the name and address of the present custodian of a copy of each such communication.

(g) If verbal:

(1) Whether by personal conversation or by telephone.

(2) The names of any persons present during the communications.

1 (3) Whether any notice or memos were
2 made of the communication and, if so, by whom and the name
3 and address of the present custodian of each such record.
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9 188. List the names, addresses, official titles
10 (if any), and other identification of all witnesses, in-
11 cluding expert witnesses, who, it is contemplated, will be
12 called upon to testify in support of your contentions in
13 this action, indicating the nature and substance of the
14 testimony which is expected to be given and the relationship
15 of each such witness, if any, to West Valley.
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21 189. Do you or your attorneys, have in your pos-
22 session, or know the existence of, any written or recorded
23 statements from any of the persons identified in your answer
24 to Interrogatory No. 188, or from any other person or entity
25 who has any knowledge of the facts and events related to the
26 issues in this proceeding?

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190. If your answer to the preceding interrogatory is in the affirmative, please state the following:

(a) The name of the person who made the statement or recording;

(b) The date the statement or recording was made;

(c) The name of the person who obtained the statement or recording;

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(d) The name of the person or persons having custody or possession of the original and all copies of the statement or recording.

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191. Describe and identify by title, author, date of preparation, recipient and subject matter, each and every document and or exhibit which you intend to use or which you may use as evidence at the hearing in this proceeding. Include in your answer, the name of the person, firm or corporation presently in possession of the original and of any copy of each such document.

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192. Have you employed, or do you intend to employ or use, any technician or expert witness for the purposes of

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1 supporting your allegations and contentions in this pro-
2 ceeding and/or for the purposes of testifying on behalf of
3 West Valley at the hearing in this proceeding? _____.
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9 193. If the answer to the preceding interrogatory
10 is in the affirmative, please state, for each such techni-
11 cian or expert, the following:

12 (a) His name or other means of identifica-
13 tion, last known address and telephone number;
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19 (b) His profession, job title or occupation
20 and the field in which he is an expert;
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(c) Whether you intend to call him as a witness during the hearing in this proceeding;

(d) A summary of his formal education in his field;

(e) The name and address of each school where he received any special education or training in his field and a description of the training;

(f) The name or description of each degree he has received, including the date each was received, and the name of the school from which he received each degree.

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194. Do any of the persons listed in your answer to Interrogatory No. 193 have any special expertise as a result of any experience or employment?

195. If your answer to the preceding interrogatory is in the affirmative, please state the following as to each such person:

(a) The training, employment or experience he has received;

(b) The name and address of the school or place where he received his training, experience or was employed;

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(c) The date he received his training,
experience or when employed;

(d) The name of each professional and or
trade association of which he is a member.

196. Have any of the persons listed in your answer
to Interrogatory No. 193 written or co-authored any books,
papers, treatises or articles on the subjects in their field
of expertise? _____.

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197. If your answer to the preceding interrogatory is in the affirmative, for each person and each such book, paper, treatise or article, please state:

(a) The title and subject matter;

(b) The name and address of the publisher;

(c) The date of publication;

198. For each person listed in your answer to Interrogatory No. 193, please state whether each such person has practiced, worked or been involved in his particular field of expertise during the past ten years.

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199. For each person identified in response to the preceding interrogatory, please state:

(a) Whether he was self-employed, employed by someone else, or associated with any other persons in any manner;

(b) Each address where he has practiced or been employed;

(c) The dates he was with such employer;

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(d) The type of duties he performed with each employer.

200. As to each person listed in your answer to the preceding interrogatory who has not practiced or worked in his field of expertise during the past ten years, list and identify each person's employment or vocation during that period of time.

201. What experience, other than that stated above has each person listed in your answer to Interrogatory No. 193 have to qualify him as an expert or technician in his field or which may give rise to his capacity as a witness at the hearing in this proceeding?

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202. Has any expert or technician conducted any tests examinations, or inspections in connection with this proceeding? _____. It your answer to this interrogatory is in the affirmative, please identify each such person.

203. If your answer to the preceding interrogatory is in the affirmative, did such expert or technician make a record or report of his findings? _____.

204. If your answer to the preceding interrogatory is in the affirmative, please state:

- (a) The date each such report was submitted;

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(b) The name or other identification,
address and telephone number of the person to whom each such
report was submitted;

(c) The name, last known address and tele-
phone number of each person who has present custody of each
such report;

(d) The subject matter and finding of each
such report.

1 205. Is any expert or technician to be compensated
2 for his work and efforts in connection with this action?

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9 206. If your answer to the preceding interrogatory
10 is in the affirmative, state as to each such expert or tech-
11 nician the amount he is to be paid and on what basis his
12 compensation is to be determined.

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18 207. For each expert you may call to testify at
19 the hearing on this proceeding, specify and state with par-
20 ticularity by expert, the subject matter on which he is ex-
21 pected to testify.

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208. State, by expert, the substance of the facts and opinions to which each such expert is expected to testify.

209. Set forth, by expert, a summary of the grounds for each opinion which may be given by each such expert at the hearing on this proceeding.

210. List specifically and in detail each and every exhibit you propose to utilize at the hearing in this proceeding or which you may utilize at the hearing on this proceeding.

1 211. With reference to the exhibits listed in
2 answer to the preceding interrogatory, state the source of
3 the exhibit, the nature of the exhibit, (i.e., whether said
4 exhibit is documentary, a picture or other); who prepared
5 each exhibit; and the date upon which each exhibit was prepared.
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11 DATED this 15 day of March, 1983.

12 SNELL & WILMER

13 By 
14

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16 Warren E. Platt
17 Charles A. Bischoff
18 Vaughn A. Crawford
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20 Phoenix, Arizona 85073
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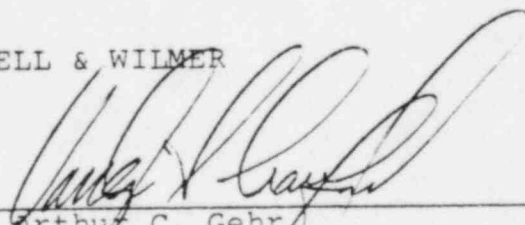
9 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

10 In the Matter of) Docket Nos. STN 50-528
11 ARIZONA PUBLIC SERVICE) STN 50-529
12 COMPANY, et al.,) STN 50-530
13 (Palo Verde Nuclear Generating)
Station, Units 1, 2 and 3))

14 CERTIFICATE OF SERVICE

15 I hereby certify that copies of Joint Applicants'
16 First Set of Non-Uniform Interrogatories to West Valley
17 Agricultural Protection Council, Inc. have been served upon
18 the following listed persons by deposit in the United States
19 mail, properly addressed and with postage prepaid, this
20 15 day of March, 1983.

22 SNELL & WILMER

23
24 By 
Arthur C. Gehr
Warren E. Platt
Charles A. Bischoff
Vaughn A. Crawford
Attorneys for Joint Applicants

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