

September 24, 1982

DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'82 SEP 24 P4:15

In the Matter of)
)
UNITED STATES DEPARTMENT OF ENERGY)
)
PROJECT MANAGEMENT CORPORATION)
)
TENNESSEE VALLEY AUTHORITY)
)
(Clinch River Breeder Reactor Plant))
)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket No. 50-537

APPLICANTS' FIFTH SET OF
INTERROGATORIES TO INTERVENORS,
NATURAL RESOURCES DEFENSE COUNCIL, INC.
AND THE SIERRA CLUB

Pursuant to 10 C.F.R. § 2.740(b), and in accordance with the Board's Scheduling Order of August 31, 1982, the United States Department of Energy, Project Management Corporation and the Tennessee Valley Authority submit the following interrogatories to Intervenors, Natural Resources Defense Council, Inc. and the Sierra Club. These interrogatories must be answered fully, within 14 days in writing and under oath, by one or more representatives of NRDC or the Sierra Club who have personal knowledge of the matters herein.

Each answer to an interrogatory shall be preceded by a copy of the particular question to which the answer is responding.

In addition to providing the direct answer to each interrogatory, where applicable, please provide the following:

(a) Identify all documents and studies, and the particular parts thereof, relied upon by Intervenors, now or in the past, which serve as the basis for the answer. In lieu thereof, at Intervenors' option, a copy of such document and study may be attached to the answer.

(b) Identify principal documents and studies, and the particular parts thereof, specifically examined but not cited in (a). In lieu thereof, at Intervenors' option, a copy of each such document and study may be attached to the answer.

(c) Identify by name, title and affiliation the primary Intervenor employee(s) or consultant(s) who provided the answer to the question.

(d) Identify the expert(s) if any, which Intervenors intend to have testify on the subject matter questioned, and state the qualifications of each such expert. This answer may be provided for each separate question or for a group of related questions. This answer need not be provided until Intervenors have in fact identified the expert(s) in question or determined that no expert will testify, as long as such answer provides reasonable notice to Applicants.

INTERROGATORIES

1. State whether NRDC believes that the experience at Rocky Flats is relevant to the environmental analysis of the CRBRP fuel cycle and if so, provide the following information:

(a) Describe in detail all aspects of the experience at Rocky Flats which NRDC believes is relevant;

(b) Describe in detail how the experience at Rocky Flats should be taken into account in analyzing the environmental effects of the CRBRP fuel cycle;

(c) Describe in detail how the experience at Rocky Flats would affect the analysis of the environmental effects of the CRBRP fuel cycle contained in the Draft Supplement to the FES.

(d) Identify and produce all documents relied upon or supporting the response to this interrogatory.

2. Describe any environmental analysis of the CRBRP fuel cycle performed by or on behalf of NRDC and produce all documents describing, summarizing or relating to such analysis.

3. State whether NRDC believes that dose consequences from design basis accidents for LWRs provide no support for the dose consequences of the CRBRP design basis accidents. If so, explain in detail why NRDC believes that the dose consequences from LWR design basis accidents provide no support for CRBRP dose consequences.

4. State whether NRDC believes that Ni-59 is the controlling radionuclide in decommissioning a nuclear plant such as CRBRP and, if so, identify and provide any and all analyses (other than the NYPIRG Report referred to in Contention 8) which supports NRDC's belief.

5. State whether NRDC agrees with the statement in the Draft Environmental Statement Supplement (DESS) on D-21 that:

It is estimated for CRBRP these releases would range from about 6×10^{-5} Ci/yr from a repository in salt to about 2.5 Ci/yr from a repository in granite (1/100th of values reported in DOE 1980).

If NRDC disagrees with this statement, identify the portion or portions with which NRDC disagrees and explain in detail the basis for the disagreement. Provide any and all documents, analyses, memoranda or studies which support NRDC's position.

6. State whether NRDC agrees with the statement in the DESS on D-21 that:

The resulting annual dose to the regional populations in the vicinity of the repository would range from about 7×10^{-5} person-rem for a repository in salt to about 1 person-rem for a repository in granite.

If NRDC disagrees with this statement, identify the portion or portions with which NRDC disagrees and explain in detail the basis for the disagreement. Provide any documents, analyses, memoranda or studies which support NRDC's position.

7. State whether NRDC agrees with the statement in the DESS on D-29 regarding dose commitments from blanket fuel fabrication that:

On this basis, the population doses to the whole body from exposure to radioactive effluents from the fabrication of blanket assemblies for the CRBRP would be expected to be less than 0.1 person-rem annually.

If NRDC disagrees with this statement, identify the portion or portions with which NRDC disagrees and explain in detail the basis for the disagreement. Provide any and all documents, analyses, memoranda or studies which support NRDC's position.

8. State whether NRDC agrees with the statement in the DESS on D-30 regarding dose commitments from fuel reprocessing that:

On this basis the U.S. population dose to the whole body from exposure to radioactive effluents is estimated to be about 140 person-rems.

If NRDC disagrees with this statement, identify the portion or portions with which NRDC disagrees and explain in detail the basis for the disagreement. Provide any and all documents, analyses, memoranda or studies which support NRDC's position.

9. State whether NRDC agrees with the statement in the DESS on D-31 regarding dose commitment from waste management that:

Since the HLW from the CRBRP would contribute less than 1/100th of the total inventory of a HLW repository, the radiological impacts from disposal of these wastes are expected to be insignificant compared to natural radiation sources.

If NRDC disagrees with this statement, identify the portion or portions with which NRDC disagrees and explain in detail the basis for the disagreement. Provide any and all documents, analyses, memoranda or studies which support NRDC's position.

10. State whether NRDC agrees with the statement in the DESS on D-31 regarding dose commitments from transportation that:

... the cumulative radiation dose to transport workers and the general population would be approximately 24 person-rem per year for the CRBRP and its related fuel cycle.

If NRDC disagrees with this statement, identify the portion or portions with which NRDC disagrees and explain in detail the basis for the disagreement. Provide any and all documents, analyses, memoranda or studies which support NRDC's position.

11. State whether NRDC agrees with the Staff conclusion in the DESS on D-31-32 that:

... the doses to transport workers and the general population associated with the shipment of radioactive material to and from the CRBRP and its related fuel cycle facilities would be negligible -- (within the range of variation of natural radiation at a given location) and indistinguishable from the doses attributable to natural sources.

If NRDC disagrees with this conclusion, identify the portion or portions with which NRDC disagrees and explain in detail the basis for the disagreement. Provide all documents, analyses, memoranda or studies which support NRDC's position.

12. State whether NRDC agrees with the conclusion in the DESS on E-11 that:

The physical security measures described in the CRBRP PSAR are reasonable for fulfilling those regulations and include provisions to detect unauthorized activities and deter theft or sabotage.

If NRDC disagrees with this conclusion, explain in detail the basis for the disagreement and identify any regulatory requirements which NRDC believes cannot be met. Provide all documents, analyses, memoranda or studies which support NRDC's position.

13. State whether NRDC agrees with the conclusion in the DESS on E-11 that:

The material control and accounting provisions described in the CRBRP PSAR meet the intent of the NRC regulations in 10 C.F.R. 70.

If NRDC disagrees with this conclusion, explain in detail the basis for the disagreement and identify any regulatory requirements which NRDC believes cannot be met. Provide all documents, analyses, memoranda or studies which support NRDC's position.

14. State whether NRDC agrees with the conclusion in the DESS on E-11 that:

The costs of safeguards as reported by DOE appear to be realistic and they are a small fraction of the total cost of CRBRP.

If NRDC disagrees with this conclusion, explain in detail the basis for the disagreement, including a description of those costs which NRDC believes are not realistic and the basis for the belief that the costs are not realistic. Provide all documents, analyses, memoranda or studies which support NRDC's position.

15. State whether NRDC agrees with the conclusion in the DESS on E-9 that:

The costs of fuel fabrication safeguards reported by DOE appear to be realistic, and represent a small fraction of the total projected costs of the facilities.

If NRDC disagrees with this conclusion, explain in detail the basis for the disagreement including a description of those costs which NRDC believes are not realistic and the basis for the belief that the costs are not realistic. Provide all documents, analyses, memoranda or studies which support NRDC's position.

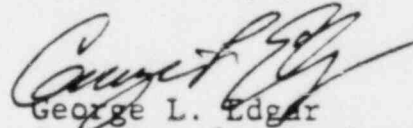
16. State whether NRDC agrees with the conclusion in the DESS on E-13 that:

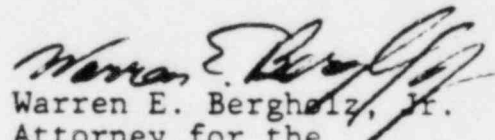
DOE costs of DRP safeguards appear to be realistic and represent only a small fraction of the total fuel cycle cost.

If NRDC disagrees with this conclusion, explain in detail the basis for the disagreement including a description of those costs which NRDC believes are not realistic and the basis for the belief that the costs are not realistic. Provide all documents, analyses, memoranda or studies which support NRDC's position.

17. State whether NRDC is aware of any impacts resulting from reactor decommissioning which NRDC believes are unacceptable. If so, identify the particular reactor(s), describe in detail the impacts which NRDC believes are unacceptable and the basis for NRDC's belief that the particular impact is unacceptable. Provide any and all documents, analyses, memoranda or studies which support NRDC's position.

Respectfully submitted,


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Management Corporation


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Department of Energy

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

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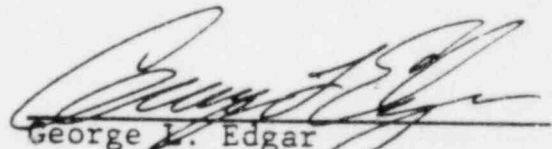
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DATED: September 24, 1982

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