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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'94 JUN 14 P2:44

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|---------------------------------|---|------------------------|
| In the Matter of |) | Docket No. 70-3070-ML |
| LOUISIANA ENERGY SERVICES, L.P. |) | ASLBP No. 91-641-02-ML |
| (Claiborne Enrichment Center |) | (Special Nuclear |
| _____ |) | Materials License) |

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SUPPLEMENTAL ANSWER TO APPLICANT'S INTERROGATORIES TO
CITIZENS AGAINST NUCLEAR TRASH REGARDING CITIZENS
AGAINST NUCLEAR TRASH'S CONTENTION H

Intervenor, Citizen's Against Nuclear Trash ("CANT"), hereby files this supplemental answer to one interrogatory which pertains to Contention H.

INTERROGATORY G-2.3:

The substance of the facts and opinions to which each witness is expected to testify and a summary of the grounds for each opinion, including the documents and all pertinent pages or parts thereof which each witness will rely upon or will otherwise use for her or his testimony.

ANSWER TO INTERROGATORY G-2.3:

Please refer to exhibit "1" (attached hereto) regarding the substance of Mr. Cliff Earl's testimony on Contention H, as well as the documents upon which Mr. Earl will rely in giving his testimony.

Respectfully submitted,

SIERRA CLUB LEGAL DEFENSE FUND, INC.
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By: Nathalie M. Walker
Nathalie M. Walker

1503

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'94 JUN 14 P2:44

In the Matter of) Docket No. 70-3070-ML
)
LOUISIANA ENERGY SERVICES, L.P.) ASLBP No. 91-641-02-ML
)
(Claiborne Enrichment Center) (Special Nuclear
Materials License)

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "SUPPLEMENTAL ANSWER TO APPLICANT'S INTERROGATORIES TO CITIZENS AGAINST NUCLEAR TRASH REGARDING CITIZENS AGAINST NUCLEAR TRASH'S CONTENTIONS H" have been served on this 10th day of June, 1994, as follows:

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Thomas S. Moore, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Administrative Judge
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Respectfully submitted,

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By: Nathalie M. Walker
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June 10, 1994

RESPONSE TO REQUEST BY LES FOR INFORMATION:

SUBSTANCE OF THE FACTS AND OPINIONS TO WHICH I EXPECT TO TESTIFY AND A SUMMARY OF THE GROUNDS FOR EACH OPINION, INCLUDING THE DOCUMENTS AND ALL PERTINENT PAGES OR PARTS THEREOF WHICH I WILL RELY UPON OR WILL OTHERWISE USE FOR MY TESTIMONY.

The substance of the facts and opinions and the grounds for each opinion to which I expect to testify are summarized in CANT's Contention H, in CANT's responses to interrogatories regarding Contention H.

I will further testify that:

- The Emergency Plan does not specify or provide the qualifications of offsite emergency organizations to handle exposure to radioactive contamination or toxic chemicals prescribed in NRC Regulatory Guide 3.67, Section 1.3
- The Emergency Plan does not identify relocation areas as prescribed in NRC Regulatory Guide 3.67, Section 1.2
- The Emergency Plan does not sufficiently identify or describe the types of accidents for which actions may be needed to protect offsite individuals. In particular, the Emergency Plan fails to provide offsite planners or response personnel with sufficient information regarding the potentially rapid onset of accidents.
- The Emergency Plan does not clearly define EALs as criteria established in advance for classifying incidents within a few minutes of the initial report.
- The Emergency Plan does not explain to offsite fire fighting authorities their expected onsite fire fighting response actions associated with alert and site area emergency conditions.
- The Emergency Plan does not provide sufficient information to evaluate whether or not all emergency response personnel will have the necessary knowledge, skills, and abilities to fulfill their emergency responsibilities, whether the onsite emergency response organization will be sufficiently staffed to perform its duties in a timely and effective way, or whether offsite fire fighting personnel responding to conditions onsite will have sufficient training to fulfill their contemplated role.
- The Emergency Plan does not provide current (i.e., as of the date of the most recent plan revision date) agreements with offsite organizations. Nor is there sufficient information to demonstrate that the resources listed in the Emergency Plan would actually be available during an emergency.

RESPONSE TO REQUEST BY LES FOR INFORMATION: (continued)

- The Emergency Plan does not demonstrate that the CEC EC could notify, mobilize, and deploy offsite fire fighters in a timely manner to effectively respond to fast paced accidents onsite.
- The Emergency Plan does not specify the key onsite fire fighting role and responsibilities of the Lisbon Volunteer Fire Department in the event of a significant accident or provide reasonable assurance that the offsite fire fighters will arrive onsite in time or fulfill their responsibility as the primary fire fighting organization.
- The Emergency Plan does not provide sufficient information to evaluate the adequacy of training, drills, and implementing procedures.

The following provide significant support to my planned testimony:

1. Louisiana Energy Services, Claiborne Enrichment Center, Emergency Plan
2. NUREG-0810 Standard Review Plan for the Review of Radiological Contingency Plans for Fuel Cycle and Materials Facilities, July 1981
3. NUREG-1491 Safety Evaluation Report for the Claiborne Enrichment Center, Homer, Louisiana. Executive Summary, Section 4, Section 8, Section 9, Section 10, Section 11, Section 12, and Section 17, January 1994
4. NUREG-1140 A Regulatory Analysis on Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees, Final Report, January 1988
5. NRC Inspection Report 40-8027/93-13, issued February 2, 1994
6. NRC Inspection Report 40-8027/92-16, issued August 5, 1992
7. NRC Inspection Report 40-8027/92-30, issued December 18, 1992
8. NRC Inspection Report 40-8027/92-31, issued January 21, 1993
9. NRC Inspection Report 40-8027/92-32, issued January 29, 1993
10. NRC Notice of Violation, SFC, issued March 25, 1993
11. NRC Event Trend Analysis for the Uranium Hexafluoride (UF₆) Conversion Facilities, August 13, 1990
12. Contingency Plan for Sequoyah Facility, Sequoyah Fuels Corporation, Gore, Oklahoma, Revision No. 5, 12/88
13. Contingency Plan for Sequoyah Facility, Sequoyah Fuels Corporation, Gore, Oklahoma, Revision No. 10, 04/91
14. Investigation/Corrective Action Summary (Draft), NO₂ Release from SFC Facility on November 17, 1992

RESPONSE TO REQUEST BY LES FOR INFORMATION: (continued)

15. FSAR, March 1992, page 6.4-40
16. FSAR, June 1992, pages 6.4-79 to 6.4-83
17. NRC RAI 6/25/91
18. LES Response to RAI 3/31/92
19. NRC RAI 11/20/92
20. LES Response to RAI 1/29/91 [92]
21. NRC RAI 3/12/93
22. LES Response to RAI 4/1/93
23. NRC RAI 4/20/93
24. LES Response to RAI 5/17/93
25. LES PLCs, September 14, 1993 pages A-1, A-8, A-9, A-11, A-20
26. RAI Response, November 20, 1992, Attachment A pages A-4 to A-18
27. Applicant's Response to "First Set of Interrogatories and Request for Production of Documents Filed by Citizens Against Nuclear Trash and Directed to Louisiana Energy Services, L.P Pertaining to Contentions A, H, I, J, and K pages 15, 16, 18, 20, 21, 22, and 27
28. Eighth Report by the Committee on Government Operations, 100th Congress, 1st Session, House Report 100-167, June 18, 1987
29. SER Related to the Authorization to Resume Operations for the Sequoyah Fuels Corporation, UF6 Conversion Facility, Gore, Oklahoma, Docket Number 40-8027, October 14, 1986, Sections I, II, III, IV, VI, VII, Appendix A, B, and C.
30. CFR Ch. 1 § 70.22 (1-1-92 Edition)
31. NRC Proposed Rules, Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees, Federal Register, April 20, 1987, p. 12923, 12924, 12926, 12927, 12929
32. NRC Rules and Regulations, Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees, Federal Register, April 7, 1989, p. 14055, 14056, 14061, 14062
33. Louisiana Energy Services' Motion for Summary Disposition of Contention H
34. NRC Briefing by Staff and Licensee on Status of Kerr-Mc Gee Sequoyah Fuels Facility, Public Meeting, March 13, 1986 pages 52 and 53
35. *The HEX Connection*, Sveriges Lantbruksuniversitet, Dissertation, Chapter 14, Uppsala, April 1991