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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
PLANNING & SERVICE
BRANCH

Before Administrative Judges:
Marshall E. Miller, Chairman
Gustave A. Linenberger, Jr.
Dr. Cadet H. Hand, Jr.

In the Matter of)
)

UNITED STATES DEPARTMENT OF ENERGY)
PROJECT MANAGEMENT CORPORATION)
TENNESSEE VALLEY AUTHORITY)

Docket No. 50-537

(Clinch River Breeder Reactor Plant))
)
)
)

NATURAL RESOURCES DEFENSE COUNCIL, INC.
AND THE SIERRA CLUB
SECOND SET OF CONSTRUCTION PERMIT INTERROGATORIES
AND REQUEST TO PRODUCE TO STAFF

Pursuant to 10 CFR § 2.740b, and in accordance with the Board's Construction Permit Scheduling Order of March 29, 1983, Intervenor, Natural Resources Defense Council, Inc. and the Sierra Club, submit the following interrogatories, to be answered fully, in writing and under oath, by one or more officers or employees of the Staff who has personal knowledge thereof or is the closest to having personal knowledge thereof. If the interrogatories are answered by more than one person, whether or

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not he or she verified the answers, and whether or not he or she is an officer or employee of the Staff, such person's name and title should be set forth together with an identification of which interrogatories he or she is responsible for.

Each answer to an interrogatory shall be preceded by a copy of the particular question to which the answer is responding. Each question is instructed to be answered in six parts, as follows.

Answer to Question _____:

- (a) Provide the direct answer to the question.
- (b) Identify all documents and studies, and the particular parts thereof, relied upon by the Staff, now or in the past, which serve as the basis for the answer. In lieu thereof, at the Staff's option, a copy of such document and study may be attached to the answer.
- (c) Identify principal documents and studies, and the particular parts thereof, specifically examined by not cited in (b). In lieu thereof, at the Staff's option, a copy of each such document and study may be attached to the answer.
- (d) Identify by name, title and affiliation the primary Staff employee(s) or consultant(s) who provided the answer to the question.
- (e) Explain whether the Staff is presently engaged in or intends to engage in any further, ongoing research program which may affect the Staff's answer. Failure to

provide such an answer means that the Staff does not intend to rely upon the existence of any such research at the construction permit hearings on the CRBR.

- (f) Identify the expert(s), if any, which the Staff intends 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 the Staff has in fact identified the expert(s) in question or determined that no expert will testify, as long as such answer provides reasonable notice to Intervenors.

As used herein, "documents" include, but are not limited to papers, photographs, criteria, standards of review, recordings, memoranda, books, records, writings, letters, telegrams, mailgrams, correspondence, notes and minutes of meetings or of conversations or of phone calls, interoffice, intra-agency or interagency memoranda or written communications of any nature, recordings of conversations either in writing or upon any mechanical or electronic or electrical recording devices, notes, exhibits, appraisals, work papers, reports, studies, opinions, surveys, evaluations, projections, hypotheses, formulas, designs, drawings, manuals, notebooks, worksheets, contracts, agreements, letter agreements, diaries, desk calendars, charts, schedules, appointment books, punchcards and computer printout sheets,

computer data, telecopier transmissions, directives, proposals, and all drafts, revisions, and differing versions (whether formal or informal) of any of the foregoing, and also all copies of any of the foregoing which differ in any way (including handwritten notations or other written or printed matter of any nature) from the original.

INTERROGATORIES

1. How many reactor-years of operation have been accumulated during the operating history of all (a) NRC licensed power reactors; and (b) NRC licensed reactors based on designs by Westinghouse?

2. How many ATWS events are known to have occurred among all NRC licensed power reactors?

3. Given that Public Service Gas and Electric of Newark reported only one of the two known ATWS events at the Salem reactor (Science 220, 15 Apr. 1983, p. 280), what confidence limits does Staff place on their estimate of the total number of ATWS events accumulated during the operating history of all NRC licensed power reactors? What confidence does Staff have that the true number is not 5 to 10 times higher than the reported number?

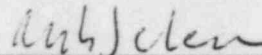
4. Explain the significance of the Salem events to the assumptions regarding the probability of an ATWS event at CRBR.

5. Has Staff performed dose calculations (independent of those reported by Applicants) using some or most of the

parameters given in SER Table A.5-1? If so, report all results and any differences in the parameters assumed by Staff and Applicants.

6. Has Staff calculated whole body and organ doses for SSST assumptions (those in 1982 SSR at p. III-11), except including additional assumptions that would be required to model the effort of the vent/purge containment release cleanup system? If so, report all dose results and assumptions that differ from those reported in the SSR.

Respectfully submitted,



Barbara A. Finamore
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Attorneys for Natural Resources
Defense Council, Inc., and
the Sierra Club

Dated: April 26, 1983

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
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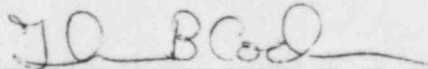
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UNITED STATES DEPARTMENT OF ENERGY)
PROJECT MANAGEMENT CORPORATION)
TENNESSEE VALLEY AUTHORITY) Docket No. 50-537
)
(Clinch River Breeder Reactor))
_____)

AFFIDAVIT OF THOMAS B. COCHRAN

I, Dr. Thomas B. Cochran, being duly sworn, depose and say:

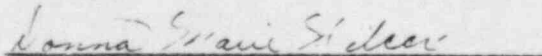
1. I am employed as a Senior Staff Scientist by the Natural Resources Defense Council, Inc., and, as such, I am duly authorized to execute the foregoing answers to interrogatories.

2. The foregoing answers are true and correct to the best of my knowledge and belief.



Dr. Thomas B. Cochran

Subscribed and sworn to before me
this 26th day of April 1983.



Notary Public

My Commission Expires July 31, 1987