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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
DUKE POWER COMPANY, <u>et al.</u>)	Docket Nos. 50-413
)	50-414
(Catawba Nuclear Station,)	
Units 1 and 2))	

APPLICANTS' INTERROGATORIES AND REQUESTS
TO PRODUCE TO CHARLOTTE-MECKLENBURG ENVIRONMENTAL
COALITION (CMEC) RELATING TO CMEC'S
CONTENTIONS 1, 2, 3 AND 4

Pursuant to 10 C.F.R. §§2.740b and 2.741, Duke Power Company, et al. ("Applicants") hereby serve Applicants' Interrogatories and Requests to Produce upon Intervenor Charlotte-Mecklenburg Environmental Coalition ("CMEC"). These interrogatories involve CMEC's Contentions 1, 2, 3 and 4.

Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to CMEC, its officers, directors or members as well as any pertinent information known to its employees, advisors, representatives or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of CMEC, its officers, directors or members as well as its employees, advisors, representatives or counsel. In answering each interrogatory and in responding to each request, recite the

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interrogatory or request preceding each answer or response. Also, identify the person providing each answer or response.

These interrogatories and requests shall be continuing in nature. Thus, any time CMEC obtains information which renders any previous response incorrect or indicates that a response was incorrect when made, CMEC should supplement its previous response to the appropriate interrogatory or request to produce. CMEC should also supplement its responses as necessary with respect to identification of each person expected to be called at the hearing as a witness, the subject matter of his or her testimony, and the substance of that testimony. Applicants are particularly interested in the names and areas of expertise of CMEC witnesses, if any. Identification of such witnesses is necessary if Applicants are to be afforded adequate time to depose them. The term "documents" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. We request that at a date or dates to be agreed upon, CMEC make available for inspection and copying all documents subject to the requests set forth below.

REQUESTS FOR DOCUMENTS

Pursuant to 10 C.F.R. §2.741, Applicants request CMEC by and through its representative or attorney to make available for inspection and copying, at a time and

location to be designated, any and all documents of whatsoever description identified in the responses to the Applicants' interrogatories below; including, but not limited to:

- (1) any written record of any oral communication between or among Intervenor, its advisors, consultants, representative, attorneys, and/or any other persons, including but not limited to the NRC Staff, the Applicants, and their advisors, consultants, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letters, memoranda, notes, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to work papers, prior drafts, and notes of meetings.

If CMEC maintains that some documents should not be made available for inspection, it should specify the documents and explain why such are not being made available. This requirement extends to any such documents, described above, in the possession of CMEC, its advisors, consultants, representatives, or attorney.

INTERROGATORIES

Pursuant to 10 C.F.R. §2.740b, the Applicants request CMEC by and through its representative or attorney to answer separately and fully in writing, under oath or affirmation, by persons having knowledge of the information requested, the following interrogatories.

A. General Interrogatories

The following interrogatories apply severally to each of the contentions admitted as issues in controversy in this proceeding.

1. State the full name, address, occupation and employer of each person answering the interrogatories and designate the interrogatory or the part thereof he or she answered.
2. Identify each and every person you are considering calling as a witness at the hearing in this matter on this contention, and with respect to each such person:
 - a. State the substance of the facts and opinions to which the witness is expected to testify;
 - b. Give a summary of the grounds for each opinion; and
 - c. Describe the witness's educational and professional background.
3. Is the contention based on one or more calculations? If so:
 - a. Describe each calculation and identify any documents setting forth such calculation.
 - b. Indicate who performed each calculation.
 - c. Indicate when each calculation was performed.
 - d. Describe each parameter used in such calculation and each value assigned to the parameter, and describe the source of your data.
 - e. Indicate the results of each calculation.
 - f. Explain in detail how each calculation provides a basis for the issue.
4. Is the contention based upon conversations, consultations, correspondence or any other type of communications with one or more individuals? If so:

- a. Identify by name and address each such individual.
- b. State the educational and professional background of each such individual, including occupation and institutional affiliations.
- c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
- d. Describe the information received from such individuals and explain how it provides a basis for the issue.
- e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence, or other communication with such individual.

B. Specific Interrogatories Relating to CMEC Contention 1

1. What is the basis for your statement that the radioactive emissions which will result from normal operation of the Catawba plant will become progressively greater during the operating life of the plant? Explain your answer.
2. Identify all of the liquid and gaseous "radioactive emissions" to which you are referring in this contention.
3. To which "projections" do you refer in paragraph (a) of this contention? Provide references to the appropriate sections of the ER.
4. Do you contend that all gaseous and liquid radioactive emissions resulting from normal plant operation will become "progressively greater" over the life of the plant? Explain your answer and identify those emissions.
5. Indicate precisely the increase in each type of radioactive emission which you contend will occur over the operating life of the plant.
6. Do you contend that these ER projections totally fail to take into account increases in radioactive emissions over the operating life of the plant? Explain your answer.

7. If your answer to the preceding interrogatory is negative, do you contend that these projections significantly understate or otherwise fail to consider adequately increased radioactive emissions over the lifetime of the plant? If so, to what extent are the projections understated? Explain your answer.
8. If your answer to the preceding interrogatory is affirmative, please explain what additional consideration you believe should be given to these "progressively greater" radioactive emissions in determining projections for normal releases from Catawba. Provide examples of what you would consider "correct" projections for particular emissions and provide support for your projections.
9. Do you contend that the Catawba ER's treatment of these projected releases violates any NRC regulation, regulatory guide, policy statement or other authority? If so, identify all such requirements.
10. Do you contend that a "correct" projection in the Catawba ER of the radioactive releases which will result from normal plant operation would reveal risks to the public health and safety so significant that they would tip the cost-benefit balance against operation of Catawba? Explain your answer, providing references to any calculations upon which you rely for support.
11. What are the bases for your responses to interrogatories 1 through 11? Identify all documents, calculations, testimony or oral statements, and all legal requirements or guidelines on which you rely.
12. To which ER and FES "projections" do you refer in paragraph (b) of this contention? Provide references to appropriate sections of the ER and FES for both McGuire and Catawba.
13. What is the basis for your statement that the assumptions underlying these projections "lack proper scientific foundation"? Explain your answer.
14. What do you mean by "wide divergences" as that term is used in paragraph (b) of this contention?
15. What do you mean by "essentially similar in design" as that phrase is used in paragraph (b)?

16. What is the basis for your implicit assumption that the projected radioactive emissions for the Catawba plant and the McGuire plant should be the same? Explain your answer.
17. Do you contend that if these projections were based upon a "proper scientific foundation" there would be no divergence between the projected normal emissions from McGuire and Catawba? Explain your answer.
18. Do you contend that the methodology used in Applicant's ER to calculate normal releases from the Catawba plant violates any NRC regulation, regulatory guide, policy statement or other legal authority? If so, identify all such requirements.
19. Do you contend that any factors other than the design of the Catawba and McGuire reactors should be considered in determining projected releases? If so, what other factors would you consider relevant in making this determination? Explain your answer.
20. Do you contend that the "wide divergence" in projected normal radioactive releases from the operation of Catawba and McGuire reflects an error in the ER so significant that it constitutes a risk to public health and safety?
21. Do you contend that a proper calculation in the Catawba ER of the liquid and gaseous radioactive emissions produced as a result of the normal operation of Catawba would reveal risks to the public health and safety so significant that they would tip the cost-benefit balance against operation of the Catawba Nuclear Station? Explain your answer, providing references to any calculations on which you rely for support.
22. What are the bases for your responses to interrogatories 13 through 21? Identify all documents, calculations, testimony or oral statements, and all legal documents or guidelines on which you rely.

C. Specific Interrogatories Relating to Contention 2

1. To which specific "projections of radioactive emissions" do you refer in this contention? Provide references to appropriate pages of the ER. Does this phrase refer to all gaseous and liquid emissions? If not, specify those emissions which are included.

2. What is the basis for your statement that the Catawba ER's projected radioactive emissions associated with normal plant operation fail to take into account accidental releases from other operating plants in the U.S.? Specify each accidental release you rely upon.
3. What do you mean by "fails to take into account" as that phrase is used in this contention?
 - (a) Do you contend that the ER's projected radioactive emissions totally fail to consider accidental releases from other operating plants? Explain your answer.
 - (b) If your answer to (a) is negative, do you contend that the ER's projected radioactive emissions fail to place sufficient emphasis upon accidental releases from other operating plants? Explain your answer.
4. Do you contend that the Applicant is required by any NRC regulation, regulatory guide, policy statement or other authority to consider in its Catawba ER accidental releases of radionuclides from other operating plants in calculating projected emissions resulting from normal plant operation? If so, identify all such requirements.
5. If your answer to the preceding interrogatory is negative please explain why you believe that accidental releases from other operating plants in the U.S. should be considered in the Catawba ER in calculating projected emissions associated with normal plant operations.
6.
 - (a) What do you mean by "actual accidental releases of radionuclides" as that phrase is used in this contention? Explain the range of incidents which you include in this phrase.
 - (b) Specify which of these accidental releases which should have been considered in the Catawba ER has not been considered.
7. For each type of "accidental release" which you listed in response to interrogatory 6(b), explain why you believe that such incident is significant and why it should be considered in developing these ER projections for emissions associated with normal operation.

- (a) Explain what you believe are the consequences of not considering in these ER projections each of the accidental releases listed in response to interrogatory 6(b).
8. Do you contend that accidental releases of radionuclides from reactor types not identical to the Catawba reactors should be considered in developing these ER projections? Explain your answer.
 9. If your response to the preceding interrogatory is affirmative, please list each reactor type whose "accidental releases" you believe should be included in developing these projections for Catawba releases and explain the relevance of each.
 10. Do you contend that the projected radioactive emissions for normal plant operation currently set forth in the Catawba ER are incorrect? Explain your answer.
 11. If your answer to the preceding interrogatory is affirmative, do you contend that Applicant's alleged failure in the ER to take into account accidental radioactive releases from other operating plants in developing its projected normal releases is sufficient to tip the cost-benefit balance against operation of the Catawba plant? Explain your answer.
 12. What are the bases for your responses to interrogatories 1 through 11? Identify all documents, calculations, testimony or oral statements, and all legal requirements or guidelines on which you rely.

D. Specific Interrogatories Relating to CMEC Contention 3

1. What is the basis for your statement that the Catawba ER underestimates the radionuclide concentrations by projecting "an erroneous and overly optimistic dilution effect in the discharge canal and in the lake"? Explain your answer.
2. Please explain fully why you believe that the current ER methodology referred to in paragraph (a) of this contention is incorrect.
3. To which ER "models and methods" do you refer in paragraph (a) of this contention? Explain your answer, providing references to appropriate pages of the ER.
4. To which particular "concentrations of radionuclides" do you refer in paragraph (a) of this contention? Explain your answer, providing references to appropriate pages of the ER.
5. Do you contend in Contention 3 that the Catawba ER underestimates all gaseous and liquid radioactive releases which result from the normal operation of the Catawba plant? Explain your answer.
6. What is the basis for your assertion that the "only suitable and realistic model" for determining radionuclide concentrations in the Catawba River would be to simply divide the "annual projected releases into the total annual amount of water leaving the lake"? Explain your answer.
7. Provide a detailed description of the methodology summarized in interrogatory 6.
8. Do you contend that the Applicant is required by any regulation, regulatory guide, policy statement, or other authority to use the methodology described in interrogatory 6 in calculating radionuclide concentrations in the Catawba River?
9. To your knowledge, has the methodology described in interrogatory 6 been used in the Environmental Reports for other nuclear power plants? In what other types of environmental assessments has it been applied?
10. Please describe your understanding of the "steady-state completely mixed model" used in the ER.

11. (a) To what extent does the "steady-state completely mixed model" underestimate radioactive concentrations? Explain your answer.

(b) What "dilution effect" do you believe should be reflected in the ER?
12. Do you contend that the "steady-state completely mixed model" should not be used at all in calculating radionuclide concentrations? If not, for what purposes can it properly be used? Explain your answer.
13. Do you contend that a determination of projected radionuclide concentrations in the Catawba ER by the methodology you recommend, rather than by the "steady-state completely mixed model," would reveal a risk to the public health and safety so significant that it would tip the cost-benefit balance against operation of the Catawba Nuclear Station? Explain your answer.
14. What are the bases for your responses to interrogatories 1 through 13? Identify all documents, testimony or oral statements, and any legal requirements or guidelines on which you rely in support of your responses.
15. What is the basis for your statement that the ER's calculated concentrations of liquid radioactive releases for the segment of the Catawba River downstream from the Catawba Station "fail to take into account" the impact of concurrent releases from the McGuire Station? Explain your answer.
16. What is the basis for your statement that the impact of liquid releases from the McGuire Station "should be taken into account in calculating concentrations of radionuclides in water drawn from the Catawba River by communities downstream from Catawba"?
17. Please explain fully why you believe that the ER's current projected radionuclide concentrations for the portion of the Catawba River downstream from the Catawba Station are incorrect.
18. To which specific "calculated concentrations of radionuclides" and which specific "liquid releases" do you refer in paragraph (b) of this contention?

- (a) Specify which of the releases listed above should have been included in the ER, explaining the significance of each release and the consequences of not including it in calculating downstream radionuclide concentrations.
19. By the phrase "fail to take into account," do you contend that the ER totally fails to consider the effect of radioactive releases from McGuire in calculating radionuclide concentrations in the Catawba River downstream from the Catawba Station? Explain your answer.
 20. If your answer to the preceding interrogatory is negative, do you contend that the ER fails to calculate correctly (or otherwise fails to consider adequately) the effect of radioactive releases from McGuire in calculating radionuclide concentrations in the Catawba River downstream from the Catawba Station? Explain your answer.
 21. Do you contend that the current calculated radionuclide concentrations for the portion of the Catawba River downstream from the Catawba Station are significantly underestimated? Explain your answer.
 22. What type of additional consideration do you contend should be given to the projected effect of radioactive releases from McGuire Nuclear Station in calculating radionuclide concentrations in the Catawba River downstream from the Catawba Nuclear Station? Explain your answer.
 23. Do you contend that the Applicant is required by any NRC regulation, regulatory guide, policy statement, or other authority to consider the "cumulative impact" of radionuclides produced by normal operation at McGuire in calculating radionuclide concentrations in the Catawba River in its Catawba Environmental Report?
 24. To which particular "communities downstream from Catawba" do you refer in paragraph (b) of this contention?
 25. Do you contend that consideration of the "cumulative impact" of radioactive releases from McGuire in calculating radionuclide concentrations in the Catawba River downstream from the Catawba Station would reveal risks to public health and safety so substantial that the cost-benefit balance would be tipped against operation of the Catawba Station? Explain your answer fully.

26. What are the bases for your responses to interrogatories 15 through 25? Identify all documents, calculations, testimony or oral statements, and any legal requirements on which you rely in support of your answers.
27. What is the basis for your assertion that the ER's calculated concentrations of radionuclides in the portion of the Catawba River upstream from the Catawba Station do not "take into account the fact that gaseous releases from normal operation of Catawba will be carried up to 50 miles from Catawba and will be brought back into the Catawba River watershed through rainfall"? Explain your answer.
28. Please explain fully why you feel that the projected concentrations of radionuclides in that portion of the Catawba River upstream from the Catawba Station are calculated incorrectly.
29. To what radionuclides (besides tritium) and which "gaseous releases from normal operation of Catawba" do you refer in paragraph (c) of this contention?
 - (a) Explain the importance of each of these releases and the consequences of failing to include each of them in determining calculated concentrations of radionuclides upstream from the Catawba Station.
30. By "does not take them into account," do you contend that the ER's current calculations of radionuclides in the Catawba River found upstream from the Catawba Station altogether ignore the possible effect of the gaseous releases referred to in paragraph (c)? Explain your answer.
31.
 - (a) If your answer to the preceding interrogatory is negative, do you contend that the ER's calculations fail to place sufficient emphasis or accord sufficient value to the possible dispersion of these gaseous releases and the subsequent re-introduction of resulting radionuclides into the Catawba River watershed?
 - (b) Describe the geographical boundaries of the area which you contend constitutes the "Catawba River watershed."
32. Do you contend that the Applicant is required by any regulation, regulatory guide, policy statement or other authority to take into account the scenario

outlined in paragraph (c) of this contention in calculating the upstream radionuclide concentrations from Catawba? If so, identify any such requirements.

33. Do you contend that proper consideration of the scenario described in paragraph (c) of this contention in calculating upstream radionuclide concentrations in the Catawba ER would reveal an additional risk to the public health and safety so significant that it would tip the cost-benefit balance against operation of Catawba Nuclear Station? Explain your answer.
34. What are the bases for your responses to interrogatories 27 through 33? Identify all documents, calculations, testimony or oral statements, and all legal requirements or guidelines on which you rely in support of your responses.

E. Specific Interrogatories Relating to CMEC Contention 4

1. What is the basis for your assertion that the DES/FES's¹ reliance upon the "absolute risk" model described in BEIR I to estimate cancer mortality risk is erroneous?
2. Explain fully your understanding of the "absolute risk" model used in estimating cancer mortality risk.
3. Explain fully your understanding of the "relative risk" model used in estimating cancer mortality risk.
4. Explain fully why you contend that the "relative risk" model should have been used in the DES/FES.
5. Have you performed any analyses or calculations which support your assertion that the "absolute risk" model "inadequately assesses" the risk of cancer mortality? If so, provide such analyses and/or calculations, indicating the source(s) on which they are based.
6. Explain the means by which you plan to demonstrate that the "absolute risk" method produces risk values that are "lower than 'relative-risk' values by factors

¹ Applicants have characterized CMEC Contention 4 as a DES/FES contention; accordingly, the interrogatories on Contention 4 are designed to elicit your concerns with both the DES's and the FES's treatment of the subject matter in question. We believe that the FES supercedes the DES and is now the operative document.

much greater than four" and "lower than observed mortality rates by factors much greater than four." Provide references to appropriate sources.

7. Do you contend that the "absolute risk" model should not be used at all in estimating cancer mortality risks? Explain your answer.
8. If your answer to the preceding interrogatory is negative, explain the purposes for which you believe the "absolute-risk" model can properly be used.
9. Do you contend that the NRC Staff is required by any regulation, regulatory guide, policy statement, or other authority to use the "relative-risk" model in estimating cancer mortality risks? If so, identify all such requirements.
10. The NRC Staff states at p. 5-18 of the DES/FES that it "regards the use of the 'relative risk' model values as a reasonable upper limit of the range of uncertainty." Do you agree with this statement? Why or why not? Explain your answer.
11. By the phrase "fails to take into account," do you contend that the DES/FES's cancer mortality risk estimates completely ignore the "time cancers take to develop after tissue irradiation"? Explain your answer.
12. If your response to the preceding interrogatory is negative, do you contend that the DES/FES's cancer mortality risk estimates fail to place sufficient emphasis or otherwise fail to consider properly the delay time between exposure to radiation and the development/detection of certain cancers? Explain your answer.
13. Explain why you believe that the failure of the "absolute-risk" model to "express risk as a percent increase in mortality rates per rad of exposure" demonstrates that this model "seriously underestimates" cancer mortality risk.
14. Do you believe that there are flaws in the "absolute risk" model other than those specifically mentioned in this contention? If so, please explain these additional flaws.
15. Explain fully how, in your opinion, Saccomanno's analysis demonstrates the inadequacy of the "absolute risk" model.

16. Explain why you contend that Saccomanno's analysis of the inadequacy of the "absolute risk" model is correct.
17. Do you contend that use of the "relative risk" model in the DES/FES would reveal additional significant risks (i.e., environmental "costs") to the public health and safety from normal operation of the Catawba Station? Explain your answer.
18. Do you contend that use of the "relative risk" model in the DES/FES would reveal additional cancer mortality risks so significant that they would tip the overall cost-benefit balance against operation of Catawba? Explain your answer.
19. What are your bases for your responses to interrogatories 1 through 18? Identify all documents, calculations, analyses, testimony or oral statements, and any legal requirements or guidelines upon which you rely in support of your answers.
20. What is the basis for your assertion that BEIR I, BEIR III and UNSCEAR are "seriously deficient in methodology"? Please address each concern you have with each of these three documents.
21. Please explain fully your assertion that:
 - (a) BEIR III "obliterates the difference in sensitivities of young and old at irradiation;"
 - (b) the BEIR III methodology "assumes without warrant the model of a ten-year latent period followed by a lifetime plateau;"
 - (c) BEIR III "rejects data on the incidence of cancer caused by irradiation of the young, without warrant;"
 - (d) BEIR III "assumes without any evidence that a combination of the linear and quadratic models should be used in its analysis."

Provide the bases for your responses to interrogatories 21 (a), (b), (c) and (d).

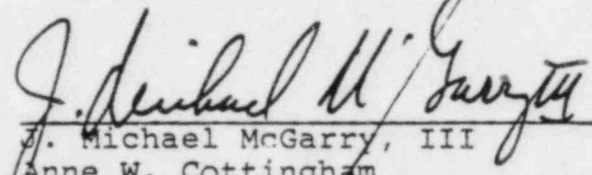
22. Aside from BEIR-I's use of the absolute risk model, do you have any other objections to that report as it relates to your contention? If so, please explain in detail.

23. Please explain your statement that "[o]ur objections to UNSCEAR are of a similar nature."
24. Do you have any "objections" to reliance upon UNSCEAR in the DES/FES other than those set forth in your response to interrogatory 20?
25. Aside from the errors ascribed by you in your contentions to BEIR-I, BEIR-III and UNSCEAR and aside from the errors ascribed by you in your responses above, are there any other errors which you maintain exist in these documents, which relate to your contention? If so, please explain in detail.
26. (a) What is the basis for your assertion that "the 'risk estimator' of 135 radiation induced cancer deaths per million person-rems ought to be increased by a factor of at least 25." In particular, please explain the "other reasons" underlying this assertion which are not set forth in the contention.

(b) Provide any analyses or calculations which you have prepared and/or upon which you rely in support of this assertion.
27. Do you contend that the recommendations of the International Commission on Radiological Protection (ICRP) (1977) relied upon in the DES/FES similarly underestimate cancer mortality risk? If so, explain why you believe this to be true.
28. Do you contend that the DES/FES risk estimates derived from BEIR I, BEIR III, and UNSCEAR are underestimated to such an extent that this error tips the overall cost-benefit balance against operation of Catawba? Please explain.
29. What sources do you contend should be relied upon in the DES/FES to properly assess cancer mortality risks?
30. What are the bases for your responses to interrogatories 20 through 29? Identify all documents, analyses, calculations, testimony or oral statements, and any legal requirements or guidelines upon which you rely.
31. What "considerable advances have taken place in radiology" which support your contention? List each one and provide supporting documentation.
32. Do you know if these "advances" have undergone peer review? If so, what were the results?

33. Does the FES address the "more recent work"? If so, where?
34. Do you contend these "considerable advances," if factored into the environmental review would tip the overall cost-benefit balance against operation of Catawba? Please explain.
35. The last paragraph of this contention makes reference to "low level radiation from CNS." Does this paragraph raise any concern that is not addressed in the preceding paragraphs of the contention? If so, please explain.
36. If the answer to interrogatory 35 is affirmative provide all materials relied upon in support of the allegation.

Respectfully submitted,


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April 25, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

U.S. SERVICE
BRANCH

In the Matter of)
)
DUKE POWER COMPANY, et al.) Docket Nos. 50-413
) 50-414
(Catawba Nuclear Station,)
Units 1 and 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Interrogatories And Requests To Produce To Charlotte-Mecklenburg Environmental Coalition (CMEC) Relating to CMEC's Contentions 1, 2, 3 and 4" in the above captioned matter have been served upon the following by deposit in the United States mail this 25th day of April, 1983.

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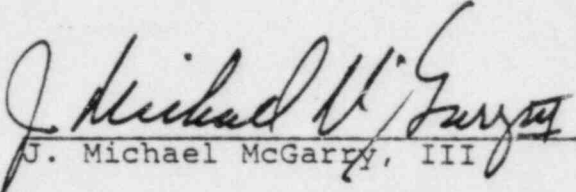
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