

April 29, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

ARIZONA PUBLIC SERVICE
COMPANY, ET AL.

(Palo Verde Nuclear Generating
Station, Units 2 and 3))

Docket Nos. STN 50-529
STN 50-530

NRC STAFF'S SECOND SET OF INTERROGATORIES TO
WEST VALLEY AGRICULTURAL PROTECTION COUNCIL, INC.

In accordance with 10 C.F.R. Sections 2.740, 2.740b and 2.741, the Staff hereby served West Valley Agricultural Protection Council, Inc. (West Valley) with Staff's Second Set of Interrogatories.

INSTRUCTIONS

1. Each Interrogatory shall be answered separately and fully in writing under oath or affirmation, and shall include all pertinent information available to West Valley, its officers, directors, members, employees, advisors, or counsel.
2. Give the name, address, occupation and employer of the person or persons answering each Interrogatory and identify the portions of each Interrogatory he answers.
3. As used herein, the term "Documents shall mean all writings and records of every type in the possession, control or custody of West Valley, its directors, officers, attorneys, employees or agents,

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including, but not limited to, memoranda, correspondence, reports, surveys, evaluations, charts, books, minutes, notes, agenda, diaries, logs, transcripts, microfilm, accounting statements, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise. "Documents" shall also mean copies of documents, even though the originals thereof are not in the possession, custody or control of West Valley, its members, or consultants.

4. For all references to documents requested in these Interrogatories, identify such documents by author, title, date of publication and publisher if the reference is published; and if it is not published, identify the document by the author, title, the date it was written, the qualification of the author relevant to this proceeding, and where a copy of the document may be obtained.

5. In your answer, repeat each Interrogatory set forth herein and then set forth an answer thereto separately and fully. As to any Interrogatory, section or subsection of said Interrogatory that you refuse to answer or which is objected to for any reasons, separately state the grounds for any such refusal. Where a complete answer to a particular Interrogatory, section or subsection of said Interrogatory is not possible, such Interrogatory, section or subsection of said Interrogatory should be answered to the extent possible and a statement made indicating the reason for the partial answer.

6. Identify any documents used as the basis for the answer to each Interrogatory.

7. If the answer to any Interrogatory is based upon a calculation, describe (a) the calculation, (b) identify any documents setting forth such calculation, (c) identify the person who performed each calculation, (d) when it was performed, (e) each parameter used in such calculation, each value assigned to the parameters, and the source of your data, (f) the results of each calculation, and (g) how each calculation provides basis for the answers.

8. If the answer to any Interrogatory is based upon conversations, consultations, correspondence or any other type of communications with one or more individuals (a) identify each such individual by name and address, (b) state the educational and professional background of each such individual, (c) describe the information received from such individual and its relation to your direct answer, (d) identify each writing or record related to each such conversation, consultation, correspondence or other communication with such individual.

9. In accordance with 10 C.F.R. § 2.740(e), these Interrogatories require prompt supplemental answers should West Valley obtain or identify supplemental information or documents.

10. Pursuant to the agreement of the parties regarding the discovery schedule for this proceeding, answers to these interrogatories are due by May 15, 1983.

INTERROGATORIES

INTERROGATORY 1

In proposed Contention III.B in West Valley's Intervention Petition, it is stated that the expected salt deposition levels in the areas of PVNGS are likely to cause injury to crops. With respect to all such farm areas where it is contended that crop injury is likely:

(a) Provide the name, location, and a description of each farm to include:

(i) the name of the owner

(ii) the legal description of the land utilized to describe this property

(iii) the number of acres of land devoted to agriculture on each farm

(iv) a designation as to whether the farm is owned by a West Valley member

(b) For each farm provide the location (distance in miles and compass direction) of all cropland, hay and pasture land from the PVNGS cooling towers

(c) As to the cropland, hay and pasture land identified in (b), list the types of crops (e.g.: cotton, alfalfa, wheat) on each farm which were grown for each of the years 1978 through 1982, to include:

(i) the acreage devoted to each such crop

(ii) the amount of each crop harvested (in pounds, bales, bushels, etc. per acre)

(iii) the sales volume (in dollars) for each crop

(d) As to each crop grown on each farm, set out the profit or loss on the sale of each crop for each of the years 1978 through 1982.

INTERROGATORY 2

In West Valley's Response to Staff's First Set of Interrogatories (hereinafter referred to as West Valley's Response), it is stated in response to Interrogatory 11 that:

. . . . the requested information is available in public records and Petitioner currently does not have this information in its records. Petitioner will make summaries of this information available to the NRC Staff as soon as it is compiled.

For each public record that West Valley claims contains the requested information:

(a) Identify each such record by name and/or title and designate the relevant sections of each record where the relevant information can be found.

(b) Describe in detail the type of information that is contained in each of these records as it applies to Staff's interrogatory.

(c) Identify by name and address those locations where copies of these records can be obtained.

(d) State the approximate date that West Valley intends to make summaries of these records available to Staff.

INTERROGATORY 3

In West Valley's Response to Interrogatory 8 of Staff's First Set of Interrogatories, West Valley failed to answer certain portions on the grounds that it did not understand what was requested. By way of explanation, what Staff has asked for in this interrogatory is West Valley's reasons why PVNGS and Chalk Point are analogous in view of the fact that even during a draught year at Chalk Point there are substantial

differences between the two locations. These differences include the fact that:

(i) crops near PVNGS are irrigated while those at Chalk Point are not.

(ii) the relative humidities are quite different between the two locations, even during drought conditions in the Chalk Point vicinity.

It is requested that West Valley explain how these obvious differences regarding irrigation and relative humidity can be reconciled to enable West Valley to contend that Chalk Point and PVNGS are analogous.

INTERROGATORY 4

In response to Interrogatory 15 a-d of Staff's First Set of Interrogatories, West Valley states that the information requested is not presently available to it. Staff is unable to determine from this response whether: (1) West Valley will later obtain information concerning time and frequency of dew formation and leaf damage and submit it in response to this interrogatory at a later date or (2) no data exists on this subject and Dr. Mulchi's conclusions are speculative. It is requested that West Valley:

(a) explain whether condition (1) or (2) above exists with respect to each interrogatory, 15.a-d. If there is some other explanation, explain fully;

(b) provide the basis, to include a description of all data, upon which Dr. Mulchi relies to assert leaf damage by dew formation and water droplets from low intensity rainfall events.

INTERROGATORY 5

In response to Interrogatory 19 of Staff's First Set of Interrogatories, West Valley states that Buckeye Irrigation Company records are not in its possession. In lieu of making Buckeye records available, it is requested that West Valley:

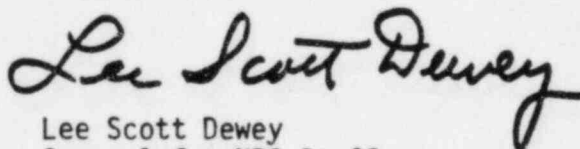
(a) Fully identify the Buckeye Irrigation records which it examined as a basis for its statement that ". . . . some water samples . . . contain twice the salt content"

(b) Fully describe which water samples West Valley refers to in its statement that "some water samples taken from the Phoenix Sewage effluent contain twice the salt content"

(c) Identify any written summaries or any other documents made by West Valley representatives as a result of examining Buckeye water quality data.

(d) Explain if, at the time West Valley inspected Buckeye Irrigation records, West Valley looked at and considered average water quality data.

Respectfully submitted,



Lee Scott Dewey
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 29th day of April, 1983

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S SECOND SET OF INTERROGATORIES TO WEST VALLEY AGRICULTURAL PROTECTION COUNCIL, INC." in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 29th day of April, 1983:

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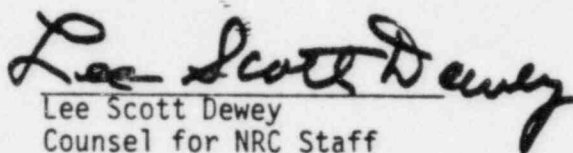
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