

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'83 JAN 10 P2:13

In the matter of:

PUBLIC SERVICE COMPANY OF
NEW HAMPSHIRE, et al

Docket Nos. 50-443 OL
50-444 OL

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

(Seabrook Station, Units 1 and 2)

SAPL'S THIRD SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO THE NUCLEAR REGULATORY COMMISSION STAFF

The Seacoast Antipollution League ("SAPL") hereby requests the NRC Staff, pursuant to 10 C.F.R. §2.740(b) and §2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to Interrogatories below, and that subsequent to filing answers to these Interrogatories and producing documents therein identified, the NRC Staff file supplemental responses and produce additional documents as required by 10 C.F.R. §2.740(e).

1. Describe in detail the basis for the Staff's conclusion that the database for assessing the probabilities of events more severe than the design basis for natural phenomenon or sabotage events is beyond the state-of-the-art of probabilistic risk assessment.
2. What is the basis for the Staff's conclusion that the additional risk from severe accidents initiated by natural events or sabotage is within the uncertainty of risks presented for the accident sequences considered in the DES and FES?
3. Please provide copies of all staff memoranda prepared in relation to the development of the Commission's Statement of Interim Policy published June 13, 1980.
4. State with particularity all numerical values assigned to the uncertainties of distributions of individual dose impacts set forth in Figures 5.4 through 5.7 and included in the summary impact table 5.10 of the DES.
5. State with particularity the basis for the Staff's conclusion that the uncertainty bounds for probabilistic and risk assessment analyses in the FES could be well over a factor of 10, but are not likely to be as large as a factor of 100. Are the uncertainty bounds equal with respect to all categories


of risk, including early fatalities, early injuries, and/or latent cancer fatalities? If they are not equal, please indicate with specificity the uncertainty bounds for each category of risk enumerated above.

6. Will the Staff produce as a witness in the proceedings any of the authors or contributors to Sandia NUREG/CR-2239? If so, please state their names and mailing addresses.
7. What is the basis for the Staff's decision not to perform accident consequence analyses using several seasonal meteorological databases in favor of mean meteorological data?
8. State with particularity the meteorological data used in consequence analysis for accidents occurring between May 30th and September 1, during periods of high population density.
9. Provide the most up-to-date data available used in the analysis of worst case accident consequences and probabilistic risk assessments.
10. Please provide copies of the following documents:
 - a) NUREG/CR-2239 with all appendices.
 - b) NUREG/CR-1659.
 - c) NUREG-0737.
 - d) NUREG-0340, Overview of the Reactor Safety Study Consequence Model, I.B. Wall, et al, U.S. NRC, October, 1977.
 - e) NUREG-0348, Demographic Statistics Pertaining to Nuclear Power Reactor Sites, U.S. NRC, October, 1979.
11. Please describe in detail the location of all monitoring devices used to gather meteorological data-used in the worst case accident analysis and probabilistic risk analysis in both the DES and FES.

Respectfully submitted,

SEACOAST ANTI-POLLUTION LEAGUE
By Its Attorneys,

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