

March 8, 1983

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

NRC STAFF'S FIRST SET OF INTERROGATORIES AND  
DOCUMENT PRODUCTION REQUESTS ON  
CONTENTION DES-17 TO PALMETTO ALLIANCE  
AND CAROLINA ENVIRONMENTAL STUDY GROUP

In accordance with 10 CFR Section 2.740, 2.740b and 2.741, the NRC Staff hereby serves Palmetto Alliance and Carolina Environmental Study Group (CESG) as intervenors in the above-captioned proceeding with NRC Staff's First Set of Interrogatories and Document Requests on Contention DES-17 to Palmetto Alliance and Carolina Environmental Study Group. These interrogatories and document requests relate to Intervenors' Contention DES-17 as admitted pursuant to the Licensing Board's Memorandum and Order (Reflecting Decisions Made Following Second Prehearing Conference), dated December 1, 1982.

Each interrogatory below is to be answered by Palmetto Alliance and CESG separately and fully in writing under oath or affirmation and shall include all pertinent information available to Intervenors, their officers, directors, members, employees, advisors, or counsel, based upon the personal knowledge of the person or persons answering. Answers to these interrogatories are required to be served upon all parties to the proceeding within 14 days after service of the interrogatories.

The Staff also requests Palmetto Alliance and CESG to make available for inspection and copying at a time and location to be designated, any and all documents identified in the responses to the interrogatories below or which provide the basis for the answers to said interrogatories. By each request for production of documents, the NRC Staff seeks to inspect and copy pertinent documents which are in the possession, custody, or control of Palmetto Alliance or CESG, their officers, directors, members, employees, advisors or counsel.

As used herein, the term "documents" shall include any writings, drawings, graphs, charts, and schedules, however produced; photographs or other pictorial representations; recordings and tapes, whether sound or visual; and data compilations of whatever form.

In addition, Palmetto Alliance and CESG are requested, pursuant to 10 CFR Section 2.740(e), to supplement their responses as necessary with respect to the identity of each person expected to be called as an expert witness at the hearing in this proceeding, the subject matter on which he or she is expected to testify, and the substance of such testimony. Similarly, Intervenors are requested to amend their responses if either subsequently learn that any response made to the interrogatories herein was incorrect when made, or that the response though correct when made is no longer correct.

#### INTERROGATORY 1

Please explain fully the sequence of the weather scenario or scenarios which you intend to describe by the phrase "the extreme condition of inversion and very slow air movement," as used in the first paragraph of DES-17.

INTERROGATORY 2

The description noted above in Interrogatory 1 pertains to design-basis accidents. In addressing "the matter of assessing serious accidents," however, different descriptive terms are used - i.e., "extreme, but frequently encountered, weather conditions." Are these described "extreme" conditions the same conditions as those referred to with respect to the analysis of design basis accidents? If not, please describe fully the sequence of the weather scenario or scenarios intended by the latter descriptive terms.

INTERROGATORY 3

Do you contend that any regulations, policy statement, guideline, or authority requires the Staff to utilize "the extreme condition of inversion and very slow air movement" in the analysis of design-basis accidents in the FES? If so, please identify each such requirement.

INTERROGATORY 4

Do you contend that the methodology of estimating 2 hour radiation doses from design-basis accidents at the exclusion area boundary, used to arrive at Table 5.9 values is an inappropriate method of assessing the impact of design-basis accidents?

INTERROGATORY 5

If your answer to Interrogatory 4 is affirmative, please explain fully the reasons why the methodology referred to in Interrogatory 4 does not provide an appropriate basis for determining radiation doses from design-basis accidents.

INTERROGATORY 6

If your answer to Interrogatory 4 is affirmative, please describe fully the method or methods of determining radiation doses from design-basis accidents which you believe is (are) appropriate, and the basis for your belief that such method(s) is (are) appropriate.

INTERROGATORY 7

Do you base your position that serious (beyond design-basis) accidents must consider "extreme" weather conditions as you define such term in answer to Interrogatory 2 on any regulation, guideline, policy statement or other authority? If so, please identify such authority.

INTERROGATORY 8

What is the "consideration" which you believe should be accorded to (a) "extreme inversion and very slow air movement" and/or (b) "extreme, but frequently encountered, weather conditions" other than is already given in the FES with respect to design-basis and severe accidents, respectively?

INTERROGATORY 9

Why does not the methodology for determining the radiation doses for (a) design-basis accidents, and (b) severe accidents described in Sections 5.9.4.5(1), 5.9.4.5(3) and 9.4 adequately consider such conditions?

INTERROGATORY 10

Do you contend that the environmental impacts of design-basis and severe accidents should be accounted for solely based on consideration of the "extreme" weather conditions which you state have not been adequately considered? Please explain the reasons for your answer.

INTERROGATORY 11

If your answer to Interrogatory 10 is affirmative, describe each of the environmental impacts which you believe should be taken into account in the FES.

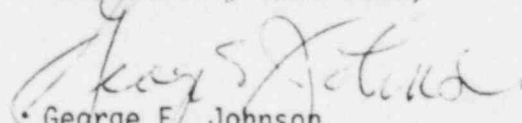
INTERROGATORY 12

If any of the impacts described in your answer to Interrogatory 11 are based on calculations, please provide such calculations.

INTERROGATORY 13

Please identify each document, correspondence or other communication, written or oral, upon which your answers to Interrogatories 1-12 are based.

Respectfully submitted,

  
George E. Johnson  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 8th day of March, 1983

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S FIRST SET OF INTERROGATORIES AND DOCUMENT PRODUCTION REQUESTS ON CONTENTION DES-17 TO PALMETTO ALLIANCE AND CAROLINA ENVIRONMENTAL STUDY GROUP" 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, by deposit in the Nuclear Regulatory Commission's internal mail system, this 8th day of March, 1983:

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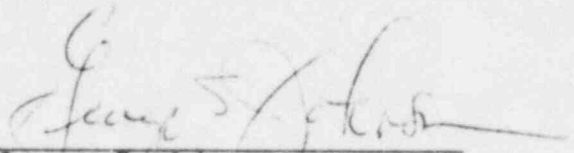
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