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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
Philadelphia Electric Company) Docket Nos. 50-352
(Limerick Generating Station,) 50-353
Units 1 and 2))

APPLICANT'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO AIR AND WATER POLLUTION PATROL

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740b, and the Atomic Safety and Licensing Board's Memorandum and Order Confirming Schedules Established During Prehearing Conference (May 16, 1983), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatories to Air and Water Pollution Patrol ("AWPP") to be answered fully in writing, under oath, in accordance with the definitions and instructions below.

Additionally, pursuant to 10 C.F.R. §2.741, Applicant requests that AWPP produce for inspection and copying (or provide copies of) those documents designated by intervenors in their respective answers below.

Definitions and Instructions

1. For each interrogatory, please state the full name, work address, and title or position of each person providing information for the answer to the interrogatory.

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2. The following definitions shall apply:

- a. "Intervenor" shall refer to Air and Water Pollution Patrol, or any officer, member, employee or consultant thereof.
- b. "Document" shall mean any written, printed, typed or other graphic matter of any kind or nature, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of intervenor, or its officials, employees, or agents; it shall also mean all copies or drafts of documents by whatsoever means made.
- c. "Date" shall mean the exact day, month and year, if ascertainable, or, if not ascertainable, the best approximation (including the event's relationship to other events in the relevant context of the interrogatory).
- d. "NRC" or "Commission" shall mean either the Atomic Energy Commission or the Nuclear Regulatory Commission, as appropriate, including its regulatory staff and adjudicatory boards, as indicated by the context of the interrogatory.
- e. "Specify", when referring to a proceeding before the Nuclear Regulatory Commission, means that the answer shall set forth the proceeding, applicant, docket number,

relevant date, and any other descriptive information appropriate to the request.

f. "Specify" or "identify", when referring to an individual, corporation, or other entity, means that the answer shall set forth the name, present or last known work address, and, if a corporation or other entity, its principle place of business or, if an individual, his or her title or titles and employer. Once an individual, corporation or other entity has been thus identified in answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation or other entity to state merely his, her or its name.

3. These interrogatories request all knowledge and information in intervenor's possession and/or knowledge and information in the possession of intervenor's agents, representatives, consultants, and, unless privileged, attorneys.

Interrogatories

1. State whether you intend to present any expert witnesses on the subject matter at issue in Contention V-4. If so, identify each such expert witness and further state (a) his professional qualifications; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is

expected to testify; (d) the grounds for each opinion. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this (these) subject(s).

2. Identify by title, author, publisher and date of issuance or publication, all documents that you rely upon as a basis for your contention or that you intend to use (by way of reference or evidentiary proffer) in presenting your direct case on Contention V-4 and all documents to which you intend to refer in conducting cross-examination of other witnesses who may testify in connection with any such contention(s).

3. To the extent that your answer to any interrogatory is based upon one or more documents, (a) identify each such document on which your answer is based; (b) identify the specific information in such document upon which you rely; (c) explain how such information provides a basis for your answer.

4. To the extent that your answer is based upon any study, calculation, research or analysis, (a) describe the nature of the study, calculation, research or analysis and identify any documents which discuss or describe the study, calculation, research or analysis; (b) identify the person(s) or entity(ies) who performed the study, calculation, research or analysis; (c) describe in detail the information which was the subject of the study, calculation, research or analysis; (d) describe the results of such study,

calculation, research or analysis; (e) explain how such study, calculation, research or analysis provides a basis for your answer.

5. To the extent that your answer is based upon conversations, consultations, correspondence or other communications with one or more individuals or entities, (a) identify each such individual or entity; (b) state the educational and professional background of each such individual, including occupation and institutional affiliations; (c) describe the nature of each communication, including time and context, and describe the information received from each such individual or entity; (e) explain how such information provides a basis for your answer.

Contention V-4

6. Specify all applicable NRC regulations, General Design Criteria, or other regulatory requirements, or guidance, or portions thereof, which intervenor asserts are applicable to Limerick and which pertain to the potential for carburetor icing if aircraft pass through the Limerick cooling tower plume.

7. Specify each section of the Limerick FSAR, including Applicant's response to Staff questions, which intervenor asserts may be relevant to the potential for carburetor icing if aircraft pass through the Limerick cooling tower plume and specify, to the extent applicable, any failure to meet the regulatory requirements set forth in response to Interrogatory 6 above.

8. With respect to the carburetor icing alleged in Contention V-4, specify (a) the type(s) of aircraft which intervenor contends would be subject to carburetor icing; (b) the assumed cruising and climbing speeds of such aircraft; (c) the atmospheric conditions which must be present in the plume, including temperature and relative humidity, for the occurrence of carburetor icing which would significantly affect operation of the aircraft; (d) the physical size of the plume utilized in the intervenor's analysis; (e) the length of time the aircraft would have to remain in the plume to achieve the degree of carburetor icing which would significantly affect the operation of the aircraft; (e) the physical dimensions, duration and frequency of the plume(s) from the Limerick cooling towers which intervenor contends will result in a potential for carburetor icing which would significantly affect the operation of the aircraft; (f) whether aircraft identified in response to (a), above, are furnished with carburetor heaters as standard equipment.

9. Set forth all meteorological and climatological data upon which intervenor relies in asserting Contention V-4.

10. Describe the effect of Visual Flying Rules ("VFR") on a pilot's likelihood of entering into or remaining in the Limerick cooling tower plume. Describe the required pilot training regarding the effects of carburetor icing and the practical instruction necessary to achieve the various FAA proficiency ratings or licenses.

11. Describe the instrumentation or indicators available to a pilot which may indicate the onset of carburetor icing.

12. Set forth all data which intervenor has obtained relating to the existence, physical dimensions, physical frequency, physical extent and duration of plumes at other power stations, including, but not limited to, related meteorological and climatological data, as well as information pertaining to the existence or nonexistence of carburetor icing.

13. Describe all qualitative analyses, if any, prepared by intervenor in support of this contention.

14. To the extent not already addressed in response to previous interrogatories, state in detail all facts upon which intervenor relies in support of this contention.

Request for Production of Documents

Please attach to your answer(s) to the interrogatories listed above a copy of all documents applicable to such answer(s), or upon which you otherwise intend to rely in the presentation of your direct case or in the cross-examination of other witnesses. Alternatively, state that all such

documents will be produced at a reasonable time and place to be agreed upon by the Applicant for inspection and copying.

CONNER & WETTERHAHN, P.C.



Troy B. Conner, Jr.
Mark J. Wetterhahn
Robert M. Rader

Counsel for the Applicant

June 3, 1983