

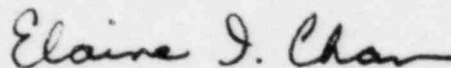
- cited in (b). In lieu thereof, at Staff's option a copy of each such document and study may be attached to the answer.
- D) Identify by name, title and affiliation and primary Staff employee(s) or consultant(s) who provided the answer to the question.
 - E) Explain whether the Staff is presently engaged in or intends to engage in any further, ongoing research program which may affect the Staff's answer. This answer need be provided only in cases where the Staff intends to rely upon ongoing research not included in Section 1.5 of the PSAR at the LWA or construction permit hearing on the CRBR. Failure to provide such an answer means that the Staff does not intend to rely upon the existence of any such research at the LWA or construction permit hearing on the CRBR.
 - F) Identify the expert(s), if any, which the Staff intends to have testify on the subject matter questioned, and state the qualifications of each such expert. This answer may be provided for each separate question or for a group of related questions. This answer need not be provided until the Staff has in fact identified the expert(s) in question or determined that no expert will testify, as long as such answer provides reasonable notice to Intervenors.

For all the responses to interrogatories in this set the following are the answers to the requested parts in the Protocol for Discovery.

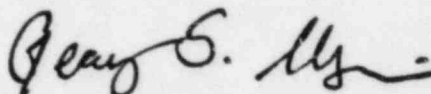
- B) All documents and studies, and the particular parts thereof, relied upon by the Staff now or in the past which serve as the basis for the answer are mentioned in the direct answer to the question unless otherwise noted.
- C) There were no principal documents and studies specifically examined but not cited in (b) unless otherwise noted.
- D) The name, title and affiliation of the Staff employee(s) or consultant(s) who provided the answer to the question are available in the affidavits.
- E) The Staff is not presently engaged in nor intends to engage in any further, on-going research program which may affect the Staff's answer unless otherwise noted.
- F) At this time, the Staff has not determined who will testify on the subject matter questioned. Reasonable notice will be given to all parties after the Staff has

made this determination. At that time, a statement of professional qualifications will be provided for each witness.

Respectfully submitted,



Elaine I. Chan
Counsel for NRC Staff



Geary S. Mizuno
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 11th day of April, 1983

NRC STAFF'S ANSWERS TO NRDC'S
SEVENTEENTH SET OF INTERROGATORIES
DATED DECEMBER 21, 1976

Interrogatory 1 concerns cost/benefit analyses, which has been litigated at the LWA-1 hearing. Therefore, no update is necessary.

Interrogatory 2 was withdrawn by NRDC. Interrogatories 5 through 7 were objected to by Staff, and the objections were sustained by the Board.

Interrogatory 3

Explain how the Staff conducts its analysis of the residual risk associated with operation of the CRBR if it does not have a final determination on the core mechanical work energy release criteria.

Response

The Staff's previous updated response (4-30-82) remains valid. However, the Staff's previous response refers to a "future" SER. That SER has now been published (NUREG-0968) and the "more specific evaluation" referred to in that response can be found in that document.

Interrogatory 4

On page 2 of the December 6 letter from the Staff, two conditions are listed both of which use the word "demonstrated." Describe in detail the Staff criteria for determining whether the conditions specified have been "demonstrated." In answering this question, if different members of the Staff concerned with the subject of condition have different views of what is meant by "demonstrated," have each such person answer this question separately.

Response

The Staff's previous answer is still valid, and no update is necessary.

Interrogatory 8

Describe in detail the criteria the Staff will apply in deciding whether the R&D program to provide adequate technical information on HCDA energetics meets the requirements of 10 CFR § 50.35(a). In this answer, particularly describe the Staff criteria for making the following determinations:

(a) Whether the Applicants have described the proposed design of the facility, including, but not limited to, the principal architectural and engineering criteria for the design.

(b) Whether the Applicants have identified the major features or components incorporated therein for the protection of the health and safety of the public.

(c) Whether the further technical and design information not supplied with the construction permit application can reasonably be left for later consideration and will be supplied in the final safety analysis report.

(d) Whether safety features or components which require research and development have been described by the Applicants and the Applicants have identified, and there will be conducted, a research and development program reasonably designed to resolve any safety questions associated with such features or components.

Response

The Staff's March 18, 1977 answers are, in general, still valid, except that the reference to NUREG-0122 should now be replaced by a reference to the CRBR SER, NUREG-0968.

Interrogatory 9

How can the Staff reach a conclusion on the ability of the CRBR is proposed to meet the LMFBR program if it does not know whether the R&D program proposed for the CRBR can meet the requirements of 10 CFR § 50.35(a)?

Response

The Staff's March 18, 1977 answer is, in general, still valid, except that further information is now available in the CRBR SER,

NUREG-0968. Further, the question of the ability to meet the LMFBR Program needs was litigated at the LWA-1 hearing.

Interrogatories 10-11

10. How does the Staff evaluate the "fall-back position" in reaching conclusions in its environmental analysis?
11. How can the Staff adequately assess the economic costs and residual risks from the CRBR if it has not yet concluded that the proposed 661 MJ "Design" is adequate." Explain in particular the range of possible designs which might be adequate, their economic cost and their impact on the timing of the CRBR if use of that design were required.

Response

The Staff's March 13, 1977 answers have been superseded by information supplied in the CRBR SER, NUREG-0968. Further, these interrogatories relate primarily to environmental analyses and economic costs, and those issues were litigated at the LWA-1 hearing.

Interrogatory 12

The following interrogatories relates to the December 14, 1976, letter from Anthony Buhl to Roger Boyd.

Does the Staff agree that completion of the energetics review within the Applicants' timeframe is essential and if so for what reason? If the reasons are the same as the Applicants', discuss in detail your analysis of the impact of a one month, four month, eight month, twelve month, delay in resolving the energetics issue on the cost and timing of the CRBR.

Response

The Staff's April 30, 1982 updated answer is still valid except that references to "LWA" should be replaced with "CP". In addition, further information on the energetics issue may be found in the CRBR SER.

