



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*

Elaine I. Chan  
Counsel for NRC Staff

*Geary S. Mizuno*

Geary S. Mizuno  
Counsel for NRC Staff

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

NRC STAFF'S ANSWERS TO NRDC'S  
TWENTY-SEVENTH SET OF INTERROGATORIES

The interrogatories in this set concern the Draft Supplement to the Final Environmental Statement for CRBR, NUREG-0139, Supplement No. 1, Draft Report (July 1982). Therefore, no updates to these interrogatories are required.



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )

UNITED STATES DEPARTMENT OF ENERGY )  
PROJECT MANAGEMENT CORPORATION )  
TENNESSEE VALLEY AUTHORITY )

Docket No. 50-537

(Clinch River Breeder Reactor Plant )

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB FIRST SET OF INTERROGATORIES TO THE STAFF, DATED NOVEMBER 18, 1975"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB SECOND SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB THIRD SET OF INTERROGATORIES TO THE NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB FOURTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB SEVENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB EIGHTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, AND THE SIERRA CLUB TENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB ELEVENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB THIRTEENTH SET OF INTERROGATORIES TO THE NUCLEAR REGULATORY STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB FOURTEENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCE DEFENSE COUNCIL, INC. AND THE SIERRA CLUB FIFTEENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB SIXTEENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF, DATED DECEMBER 7, 1976"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB SEVENTEENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCE DEFENSE COUNCIL, INC. AND THE SIERRA CLUB NINETEENTH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB TWENTIETH SET OF INTERROGATORIES TO NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB TWENTY-FIRST SET OF INTERROGATORIES TO THE NUCLEAR REGULATORY COMMISSION STAFF"; "NRC STAFF'S

*RSOM*

UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB TWENTY-SECOND SET OF INTERROGATORIES TO STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCE DEFENSE COUNCIL, INC. AND THE SIERRA SUB TWENTY-FOURTH SET OF INTERROGATORIES AND REQUEST TO PRODUCE TO STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, AND THE SIERRA CLUB TWENTY-FIFTH SET OF INTERROGATORIES TO STAFF"; "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCE DEFENSE COUNCIL, INC. AND THE SIERRA CLUB TWENTY-SICHTH SET OF INTERROGATORIES TO STAFF" and "NRC STAFF'S UPDATED ANSWERS TO NATURAL RESOURCES DEFENSE COUNCIL, INC. AND THE SIERRA CLUB TWENTY-SEVENTH SET OF INTERROGATORIES AND REQUEST TO PRODUCE TO STAFF" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by (\*) through deposit in the Nuclear Regulatory Commission's internal mail system, or, as indicated by (\*\*) hand delivery this 11th day of April, 1983:

Marshall Miller, Esq., Chairman  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555\*

Mr. Gustave A. Linenberger  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555\*

Dr. Cadet H. Hand, Jr., Director  
Administrative Judge  
Bodega Marine Laboratory  
University of California  
P.O. Box 247  
Bodega Bay, CA 94923

William E. Lantrip, Esq.  
City Attorney  
Municipal Building  
P.O. Box 1  
Oak Ridge, TN 37830

William M. Leech, Jr., Attorney General  
William B. Hubbard, Chief Deputy  
Attorney General  
Michael D. Pearigen, Assistant  
Attorney General  
Michael E. Terry, Esq.  
450 James Robertson Parkway  
Nashville, TN 37219

Lawson McGhee Public Library  
500 West Church Street  
Knoxville, TN 37902

R. Tenny Johnson  
Leon Silverstrom  
Warren E. Bergholz, Jr.  
William D. Luck  
U.S. Department of Energy  
1000 Independence Ave., S.W.  
Room 6-B-256  
Washington, DC 20585

Project Management Corporation  
P.O. Box U  
Oak Ridge, TN 37830

George L. Edgar, Esq.  
Frank K. Peterson, Esq.  
Gregg A. Day, Esq.  
Thomas A. Schmutz, Esq.  
Irvin A. Shapell, Esq.  
Morgan, Lewis & Bockius  
1800 M Street, N.W.  
Washington, DC 20036

Barbara A. Finamore  
Ellyn R. Weiss  
Dr. Thomas B. Cochran  
S. Jacob Scherr  
Natural Resources Defense  
Council, Inc.  
1725 Eye Street, N.W.  
Suite 600  
Washington, DC 20006 \*\*

Manager of Power  
Tennessee Valley Authority  
819 Power Building  
Chattanooga, TN 37401

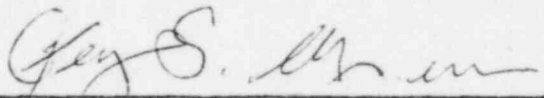
Director  
Clinch River Breeder Reactor  
Plant Project  
U.S. Department of Energy  
Washington, DC 20585

Eldon V. C. Greenberg, Esq.  
Galloway & Greenberg  
1725 Eye Street, N.W.  
Suite 601  
Washington, DC 20006

Atomic Safety and Licensing Appeal  
Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555\*

Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555\*

Docketing and Service Section  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555\*

  
\_\_\_\_\_  
Geary S. Mizuno  
Counsel for NRC Staff