

DOCKETED

5/16/83

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'83 MAY 19 AM 10:02

In the Matter of)

VIRGINIA ELECTRIC AND POWER)
COMPANY)(North Anna Power Station,)
Units 1 and 2))(Proposed Amendments to Operating)
License to Allow Receipt and Storage)
of 500 Spent Fuel Assemblies from)
Surry Power Station, Units 1 and 2,)
and Expansion of Spent Fuel Pool)
Storage Capacity))Docket Nos. 50-338/339
OLA-1 and OLA-2RESPONSE OF LOUISA COUNTY TO NRC STAFF
INTERROGATORIES AND REQUEST FOR DOCUMENTS

Louisa County, by its undersigned attorneys, responds to NRC Staff's first discovery request as follows:

Interrogatory 1-1.

- a. Upon what person or persons do you rely to substantiate your case on contention no. IV.
- b. Provide the addresses and education and professional qualifications of any persons named in your response to a. above.
- c. Identify which of the above persons you intend to call as witnesses on this contention in this proceeding.
- d. Identify which of those persons identified in c. above you anticipate will appear voluntarily and which under subpoena.

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Response:

a. The County has not yet determined who will be called as a witness on its behalf to testify regarding the admitted contentions. The witnesses may include Dale G. Bridenbaugh and other consultants, as well as Vepco and/or NRC Staff personnel and others whose identities cannot be determined until discovery is complete.

b. A copy of Mr. Bridenbaugh's resume is provided at Attachment A. Similar information for other potential County witnesses will be provided after they are identified.

c. See response to Interrogatory 1-1a.

d. It is anticipated that Mr. Bridenbaugh will appear voluntarily (as a County consultant) if requested. Other potential witnesses may or may not.

Interrogatory 1-2. Provide summaries of the views, positions, or proposed testimony on contention no. IV of all persons named in response to Interrogatory 1-1, that you intend to present during this proceeding.

Response: Until the witnesses to be called on the County's behalf are known, the County will be unable to provide their views, positions, or proposed testimony.

Interrogatory 1-3. State all bases, calculations, and references used that you intend to use during this proceeding to support the positions stated in response to Interrogatory 1-2. The foregoing should be supplied with respect to both Louisa County's direct presentation and to such evidence as Louisa

County may attempt to adduce upon cross-examination of witnesses presented by the Applicant and/or NRC Staff.

Response: See response to Interrogatory 1-2.

Interrogatory 1-4. Identify all documentary or other material which you intend to offer as exhibits on this contention in this proceeding.

Response: The County has not completed its investigation and discovery so cannot provide a definitive answer to this question. A partial, potential list is provided as Attachment B.

Interrogatory 2-1.

a. Upon what person or persons do you rely to substantiate your case on contention no. VI.

b. Provide the addresses and educational and professional qualifications of any person named in your response to a. above.

c. Identify which of the above persons you intend to call as witnesses on this contention in this proceeding.

d. Identify which of those persons identified in c. above you anticipate will appear voluntarily and which under subpoena.

Response:

a. See response to Interrogatory 1-1a.

b. See response to Interrogatory 1-1b.

c. See response to Interrogatory 1-1c.

d. See response to Interrogatory 1-1d.

Interrogatory 2-2. Provide summaries of the views, positions or proposed testimony on contention no. VI of all

persons named in response to Interrogatory 2-2 that you intend to present during this proceeding.

Response: See response to Interrogatory 1-2. Also, the County is aware that when the Zion and Dresden spent fuel pools were re-racked, the licensees were required to monitor the effects of Boraflex and report their findings to the Commission. The County intends to use these reports to support Contention VI.

Interrogatory 2-3. State all bases, calculations, and references used that you intend to use during this proceeding to support the positions stated in response to Interrogatory 2-2. The foregoing should be supplied with respect to both Louisa County's direct presentation and to such evidence as Louisa County may attempt to adduce upon cross-examination of witnesses presented by the Applicant and/or the NRC Staff.

Response: See response to Interrogatory 1-3.

Interrogatory 2-4. Identify all documentary or other material which you intend to offer as exhibits on this contention in this proceeding.

Response: The County has not completed its investigation and discovery so cannot provide a definitive answer to this question. A partial, potential list is provided as Attachment C.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

May 16, 1983

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PROFESSIONAL QUALIFICATIONS OF DALE G. BRIDENBAUGH

DALE G. BRIDENBAUGH
1723 Hamilton Avenue
Suite K
San Jose, CA 95125
(408) 266-2716

EXPERIENCE:

1976 - PRESENT

President - MHB Technical Associates, San Jose, California.
Co-founder and partner of technical consulting firm. Specialists in energy consulting to governmental and other groups interested in evaluation of nuclear plant safety and licensing. Consultant in this capacity to state agencies in California, New York, Illinois, New Jersey, Pennsylvania, Oklahoma and Minnesota and to the Norwegian Nuclear Power Committee, Swedish Nuclear Inspectorate, and various other organizations and environmental groups. Performed extensive safety analysis for Swedish Energy Commission and contributed to the Union of Concerned Scientist's Review of WASH-1400. Consultant to the U.S. NRC - LWR Safety Improvement Program, performed Cost Analysis of Spent Fuel Disposal for the Natural Resources Defense Council, and contributed to the Department of Energy LWR Safety Improvement Program for Sandia Laboratories. Served as expert witness in NRC and state utility commission hearings.

1976 - (FEBRUARY - AUGUST)

Consultant, Project Survival, Palo Alto, California.

Volunteer work on Nuclear Safeguards Initiative campaigns in California, Oregon, Washington, Arizona, and Colorado. Numerous presentations on nuclear power and alternative energy options to civic, government, and college groups. Also resource person for public service presentations on radio and television.

1973 - 1976

Manager, Performance Evaluation and Improvement, General Electric Company - Nuclear Energy Division, San Jose, California.

Managed seventeen technical and seven clerical personnel with responsibility for establishment and management of systems to monitor and measure Boiling Water Reactor equipment and system operational performance. Integrated General Electric resources in customer plant modifications, coordinated correction of causes of forced outages and of efforts to improve reliability and performance of BWR systems.

1973 - 1976 (Contd)

Responsible for development of Division Master Performance Improvement Plan as well as for numerous Staff special assignments on long-range studies. Was on special assignment for the management of two different ad hoc projects formed to resolve unique technical problems.

1972 - 1973

Manager, Product Service, General Electric Company - Nuclear Energy Division, San Jose, California.

Managed group of twenty-one technical and four clerical personnel. Prime responsibility was to direct interface and liaison personnel involved in corrective actions required under contract warranties. Also in charge of refueling and service planning, performance analysis, and service communication functions supporting all completed commercial nuclear power reactors supplied by General Electric, both domestic and overseas (Spain, Germany, Italy, Japan, India, and Switzerland).

1968 - 1972

Manager, Product Service, General Electric Company - Nuclear Energy Division, San Jose, California.

Managed sixteen technical and six clerical personnel with the responsibility for all customer contact, planning and execution of work required after the customer acceptance of department-supplied plants and/or equipment. This included quotation, sale and delivery of spare and renewal parts. Sales volume of parts increased from \$1,000,000 in 1968 to over \$3,000,000 in 1972.

1966 - 1968

Manager, Complaint and Warranty Service, General Electric Company - Nuclear Energy Division, San Jose, California.

Managed group of six persons with the responsibility for customer contacts, planning and execution of work required after customer acceptance of department-supplied plants and/or equipment--both domestic and overseas.

1963 - 1966

Field Engineering Supervisor, General Electric Company, Installation and Service Engineering Department, Los Angeles, California.

Supervised approximately eight field representatives with responsibility for General Electric steam and gas turbine installation and maintenance work in Southern California, Arizona, and Southern Nevada. During this period was responsible for the installation of eight different central station steam turbine generator units, plus much maintenance activity. Work included customer contact, preparation of quotations, and contract negotiations.

1956 - 1963

Field Engineer, General Electric Company, Installation and Service Engineering Department, Chicago, Illinois.

Supervised installation and maintenance of steam turbines of all sizes. Supervised crews of from ten to more than one hundred men, depending on the job. Worked primarily with large utilities but had significant work with steel, petroleum and other process industries. Had four years of experience at construction, startup, trouble-shooting and refueling of the first large-scale commercial nuclear power unit.

1955 - 1956

Engineering Training Program, General Electric Company, Erie, Pennsylvania, and Schenectady, New York.

Training assignments in plant facilities design and in steam turbine testing at two General Electric Factory locations.

1953 - 1955

United States Army - Ordnance School, Aberdeen, Maryland.

Instructor - Heavy Artillery Repair. Taught classroom and shop disassembly of artillery pieces.

1953

Engineering Training Program, General Electric Company, Evendale, Ohio.

Training assignment with Aircraft Gas Turbine Department.

EDUCATION & AFFILIATIONS:

BSME - 1953, South Dakota School of Mines and Technology, Rapid City, South Dakota, Upper 1/2 of class.

Professional Nuclear Engineer - California. Certificate No. 0973.

Member - American Nuclear Society.

Various Company Training Courses during career including Professional Business Management, Kepner Tregoe Decision Making, Effective Presentation, and numerous technical seminars.

HONORS & AWARDS:

Sigma Tau - Honorary Engineering Fraternity.

General Managers Award, General Electric Company.

PERSONAL DATA:

Born November 20, 1931, Miller, South Dakota.

Married, three children

6'2", 190 lbs., health - excellent

Honorable discharge from United States Army

Hobbies: Skiing, hiking, work with Cub and Boy Scout Groups.

PUBLICATIONS & TESTIMONY:

1. Operating and Maintenance Experience, presented at Twelfth Annual Seminar for Electric Utility Executives, Pebble Beach, California, October 1972, published in General Electric NEDC-10697, December 1972.
2. Maintenance and In-Service Inspection, presented at IAEA Symposium on Experience From Operating and Fueling of Nuclear Power Plants, Bridenbaugh, Lloyd & Turner, Vienna, Austria, October, 1973.
3. Operating and Maintenance Experience, presented at Thirteenth Annual Seminar for Electric Utility Executives, Pebble Beach, California, November, 1973, published in General Electric NEDO-20222, January, 1974.
4. Improving Plant Availability, presented at Thirteenth Annual Seminar for Electric Utility Executives, Pebble Beach, California, November 1973, published in General Electric NEDO-20222, January, 1974.
5. Application of Plant Outage Experience to Improve Plant Performance, Bridenbaugh and Burdsall, American Power Conference, Chicago, Illinois, April 14, 1974.
6. Nuclear Valve Testing Cuts Cost, Time, Electrical World, October, 15, 1974.
7. The Risks of Nuclear Power Reactors: A Review of the NRC Reactor Safety Study WASH-1400, Kendall, Hubbard, Minor & Bridenbaugh, et al, for the Union of Concerned Scientists, August, 1977.

8. Swedish Reactor Safety Study: Barsebäck Risk Assessment, MHB Technical Associates, January, 1978. (Published by the Swedish Department of Industry as Document DsI 1978:1)
9. Testimony of D.G. Bridenbaugh, R.B. Hubbard, G.C. Minor to the California State Assembly Committee on Resources, Land Use, and Energy, March 8, 1976.
10. Testimony of D.G. Bridenbaugh, R.B. Hubbard, and G.C. Minor before the United States Congress, Joint Committee on Atomic Energy, February 18, 1976, Washington, DC (Published by the Union of Concerned Scientists, Cambridge, Massachusetts.)
11. Testimony by D.G. Bridenbaugh before the California Energy Commission, entitled, Initiation of Catastrophic Accidents at Diablo Canyon, Hearings on Emergency Planning, Avila Beach, California, November 4, 1976.
12. Testimony by D.G. Bridenbaugh before the U.S. Nuclear Regulatory Commission, subject: Diablo Canyon Nuclear Plant Performance, Atomic Safety and Licensing Board Hearings, December, 1976.
13. Testimony by D.G. Bridenbaugh before the California Energy Commission, subject: Interim Spent Fuel Storage Considerations, March 10, 1977.
14. Testimony by D.G. Bridenbaugh before the New York State Public Service Commission Siting Board Hearings concerning the Jamesport Nuclear Power Station, subject: Effect of Technical and Safety Deficiencies on Nuclear Plant Cost and Reliability, April, 1977.
15. Testimony by D.G. Bridenbaugh before the California State Energy Commission, subject: Decommissioning of Pressurized Water Reactors, Sundesert Nuclear Plant Hearings, June 9, 1977.
16. Testimony by D.G. Bridenbaugh before the California State Energy Commission, subject: Economic Relationships of Decommissioning, Sundesert Nuclear Plant, for the Natural Resources Defense Council, July 15, 1977.
17. Testimony by D.G. Bridenbaugh before the Vermont State Board of Health, subject: Operation of Vermont Yankee Nuclear Plant and Its Impact on Public Health and Safety, October 6, 1977.
18. Testimony by D.G. Bridenbaugh before the U.S. Nuclear Regulatory Commission, Atomic Safety and Licensing Board, subject: Deficiencies in Safety Evaluation of Non-Seismic Issues, Lack of a Definitive Finding of Safety, Diablo Canyon Nuclear Units October 18, 1977, Avila Beach, California.

19. Testimony by D.G. Bridenbaugh before the Norwegian Commission on Nuclear Power, subject: Reactor Safety/Risk, October 26, 1977.
20. Testimony by D.G. Bridenbaugh before the Louisiana State Legislature Committee on Natural Resources, subject: Nuclear Power Plant Deficiencies Impacting on Safety & Reliability, Baton Rouge, Louisiana, February 13, 1978.
21. Spent Fuel Disposal Costs, report prepared by D.G. Bridenbaugh for the Natural Resources Defense Council (NRDC), August 31, 1978.
22. Testimony by D.G. Bridenbaugh, G.C. Minor, and R.B. Hubbard before the Atomic Safety and Licensing Board, in the matter of the Black Fox Nuclear Power Station Construction Permit Hearings, September 25, 1978, Tulsa, Oklahoma.
23. Testimony of D.G. Bridenbaugh and R.B. Hubbard before the Louisiana Public Service Commission, Nuclear Plant and Power Generation Costs, November 19, 1978, Baton Rouge, Louisiana.
24. Testimony by D.G. Bridenbaugh before the City Council and Electric Utility Commission of Austin, Texas, Design, Construction, and Operating Experience of Nuclear Generating Facilities, December 5, 1978, Austin, Texas.
25. Testimony by D.G. Bridenbaugh for the Commonwealth of Massachusetts, Department of Public Utilities, Impact of Unresolved Safety Issues, Generic Deficiencies, and Three Mile Island-Initiated Modifications on Power Generation Cost at the Proposed Pilgrim-2 Nuclear Plant, June 8, 1979.
26. Improving the Safety of LWR Power Plants, MHB Technical Associates, prepared for U.S. Dept. of Energy, Sandia Laboratories, September 28, 1979.
27. BWR Pipe and Nozzle Cracks, MHB Technical Associates, for the Swedish Nuclear Power Inspectorate (SKI), October, 1979.
28. Uncertainty in Nuclear Risk Assessment Methodology. MHB Technical Associates, for the Swedish Nuclear Power Inspectorate (SKI), January, 1980.
29. Testimony of D.G. Bridenbaugh and G.C. Minor before the Atomic Safety and Licensing Board, in the matter of Sacramento Municipal Utility District, Rancho Seco Nuclear Generating Station following TMI-2 accident, subject: Operator Training and Human Factors Engineering, for the California Energy Commission, February 11, 1980.
30. Italian Reactor Safety Study: Caorso Risk Assessment, MHB Technical Associates, for Friends of the Earth, Italy, March, 1980.

31. Decontamination of Krypton-85 from Three Mile Island Nuclear Plant, H. Kendall, R. Pollard, & D.G. Bridenbaugh, et al, The Union of Concerned Scientists, delivered to the Governor of Pennsylvania, May 15, 1980.
32. Testimony by D.G. Bridenbaugh before the New Jersey Board of Public Utilities, on behalf of New Jersey Public Advocate's Office, Division of Rate Counsel, Analysis of 1979 Salem-1 Refueling Outage, August, 1980.
33. Minnesota Nuclear Plants Gaseous Emissions Study, MHB Technical Associates, for Minnesota Pollution Control Agency, September, 1980.
34. Position Statement, Proposed Rulemaking on the Storage and Disposal of Nuclear Waste, Joint Cross-Statement of Position of the New England Coalition on Nuclear Pollution and the Natural Resources Defense Council, September, 1980.
35. Testimony by D.G. Bridenbaugh and Gregory C. Minor, before the New York State Public Service Commission, In the Matter of Long Island Lighting Company Temporary Rate Case, prepared for the Shoreham Opponents Coalition, September 22, 1980, Shoreham Nuclear Plant Construction Schedule.
36. Supplemental Testimony by D.G. Bridenbaugh before the New Jersey Board of Public Utilities, on behalf of New Jersey Public Advocate's Office, Division of Rate Counsel, Analysis of 1979 Salem-1 Refueling Outage, December, 1980.
37. Testimony by D.G. Bridenbaugh and Gregory C. Minor, before the New Jersey Board of Public Utilities, on behalf of New Jersey Department of the Public Advocate, Division of Rate Counsel, Oyster Creek 1980 Refueling Outage Investigation, February, 1981.
38. Economic Assessment: Ownership Interest in Palo Verde Nuclear Station, MHB Technical Associates, for The City of Riverside, September 11, 1981.
39. Testimony of D.G. Bridenbaugh before the Public Utilities Commission of Ohio, in the matter of the Regulation of the Electric Fuel Component Contained Within the Rate Schedules of the Toledo Edison Company and Related Matters, subject: Davis-Besse Nuclear Power Station 1980-81 Outage Review, October, 1981.
40. Supplemental Testimony of D.G. Bridenbaugh before the Public Utilities Commission of Ohio, in the matter of the Regulation of the Electric Fuel Component Contained within the Rate Schedules of the Toledo Edison Company and Related Matters, subject: Davis-Besse Nuclear Power Station 1980-81 Outage Review, November, 1981.

41. Systems Interaction and Single Failure Criterion, Phase 2 Report, MHB Technical Associates for the Swedish Nuclear Power Inspectorate (SKI), January, 1982.
42. Testimony of D. G. Bridenbaugh and Gregory C. Minor on behalf of Governor Edmund G. Brown Jr., before the Atomic Safety and Licensing Board, regarding Contention 10, Pressurizer Heaters, January 11, 1982.
43. Testimony of D. G. Bridenbaugh and Gregory C. Minor on behalf of Governor Edmund G. Brown Jr., before the Atomic Safety and Licensing Board, regarding Contention 12, Block and Pilot Operated Relief Valves, January 11, 1982.
44. Testimony of D. G. Bridenbaugh before the Commonwealth of Massachusetts, Department of Public Utilities, on behalf of the Massachusetts Attorney General, Pilgrim Nuclear Power Station, 1981-82 Outage Investigation, March 11, 1982.
45. Testimony of D. G. Bridenbaugh before the Pennsylvania Public Utility Commission, on behalf of the Pennsylvania Office of Consumer Advocate, Beaver Valley Outage, March, 1982.
46. Interim testimony of D. G. Bridenbaugh before the Illinois Commerce Commission, on behalf of the Illinois Attorney General's Office, Expected Lifetimes and Performance of Nuclear Power Plants, March, 1982.
47. Testimony of D. G. Bridenbaugh and G. C. Minor before the Atomic Safety and Licensing Board, on behalf of Suffolk County, in the matter of Long Island Lighting Company, Shoreham Nuclear Power Station, Unit 1, regarding Suffolk County Contention 11, Passive Mechanical Valve Failures, April 13, 1982.
48. Testimony of D. G. Bridenbaugh and R. B. Hubbard, in the Matter of Jersey Central Power and Light Company For An Increase in Rates for Electrical Service, on behalf of New Jersey Department of the Public Advocate, Division of Rate Counsel, Three Mile Island Units 1 & 2, Cleanup and Modification Programs, May, 1982.
49. Testimony of D. G. Bridenbaugh and G. C. Minor on behalf of Suffolk County, before the Atomic Safety and Licensing Board, in the matter of Long Island Lighting Company, Shoreham Nuclear Power Station, Unit 1, regarding Suffolk County Contention 22, SRV Test Program, May 25, 1982.

50. Testimony of D. G. Bridenbaugh and G. C. Minor on behalf of Suffolk County, before the Atomic Safety and Licensing Board, in the matter of Long Island Lighting Company, Shoreham Nuclear Power Station, Unit 1, regarding Suffolk County Contention 28(a)(vi) and SOC Contention 7A(6), Reduction of SRV Challenges, June 14, 1982.
51. Testimony of D. G. Bridenbaugh before the Illinois Commerce Commission, on behalf of the Illinois Attorney General's Office, Expected Lifetimes and Performance of Nuclear Power Plants, June 18, 1982.

Attachment B

1. Safety Evaluation by the Office of Nuclear Reactor Regulation Relating to Modification of the Spent Fuel Storage Racks. Facility Operating License No. NPF-4. Virginia Electric and Power Co., North Anna Power Station Units 1 and 2. Docket No. 50-338 and 50-339. January 29, 1979.
2. Environmental Impact Appraisal by the Office of Nuclear Reactor Regulation Relating to the Modification of the Spent Fuel Pool. Facility Operating License DPR-39 and DPR-43. Zion Nuclear Power Station Units 1 and 2. Docket No. 50-295 and 50-304. March 29, 1979.
3. Environmental Impact Appraisal by the Office of Nuclear Reactor Regulation Relating to the Modification of the Spent Fuel Pool. Salem Nuclear Generating Station Unit 1. Docket 50-272.
4. Safety Evaluation by the Office of Nuclear Reactor Regulation Relating to the Modification of the Spent Fuel Storage Pool. Salem Nuclear Generating Station Unit No. 1. Docket No. 50-272.
5. Safety Evaluation Report for North Anna Power Station Units 1 and 2 and documents referenced therein.
6. Final Safety Analysis Report for North Anna Power Station Units 1 and 2 and documents referenced therein.
7. Occupational Radiation Exposure at Commercial Nuclear Power Reactors. 1980. NUREG-0713, Vol. 2.
8. Amendment to Operating Licenses NPF-4 and NPF-4, August 20, 1982 (and Attachments).

Attachment C

1. Spent Fuel Storage: A Summary of Information in Support of Increasing the Spent Fuel Storage Capacity at North Anna Power Station Units 1 and 2. Virginia Electric and Power Co. August 1982.
2. Summary of Information in Support of the Storage of Surry Spent Fuel at North Anna Power Station Unit Nos. 1 and 2. Virginia Electric and Power Co. July 1982.
3. NRC Office of Inspection and Enforcement. IE Bulletin No. 79-26. November 20, 1979. "Boron Loss from BWR Control Blades."
4. An Evaluation of Potential Chemical/Mechanical Degredation Processes Affecting Fuel and Structural Materials Under Long-Term Water Storage. G. E. Zima. Batelle. May 1979. NUREG/CR-0668. PNL-2379.
5. Safety Evaluation by Office of Nuclear Reactor Regulation Relating to the Modification of the Spent Fuel Storage Pool. Salem Nuclear Generating Station Unit No. 1. Docket No. 50-272.
6. Safety Evaluation Report for North Anna Power Station Units 1 and 2 and documents referenced therein.
7. Final Safety Analysis Report for North Anna Power Station Units 1 and 2 and documents referenced therein.
8. J. R. Weeks, Corrosion of Materials in Spent Fuel Storage Pools, Brookhaven National Laboratories, BNL-NUREG 23021 (July 1977).
9. J. R. Weeks, Corrosion Considerations in the Use of Boral in Spent Fuel Storage Racks, Brookhaven National Laboratories, BNL-NUREG 25582 (January 1979).

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing Response of Louisa County to NRC Staff Interrogatories and Request For Documents upon each of the persons named below by depositing a copy in the United States mail, properly stamped and addressed to him at the address set out with his name:

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Chief, Docketing and Service Section

Sheldon J. Wolfe, Chairman
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry Kline
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. George A. Ferguson
School of Engineering
Howard University
2300 5th Street, N.W.
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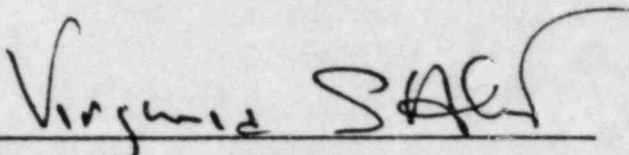
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May 16, 1983


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