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May 31, 1991

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Larry Smukler, Chairman
Nuclear Decommissioning
Financing Committee
N.H. Public Utilities Commission
8 Old Suncook Road
Concord, New Hampshire 03301

RE: NDFC 91-1

Dear Mr. Smukler:

I enclose the original and 15 copies of New
Hampshire Yankee's Objection to Certain Data
Requests.

Sincerely,

Edward A. Haffer

EAH:d1

Enclosures

CC w/enc: Service List

9106050237 910531
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G PDR

YEO3
111

STATE OF NEW HAMPSHIRE
NUCLEAR DECOMMISSIONING FINANCING COMMITTEE

In Re Seabrook Station - Unit 1

Docket NDFC 91-1

NEW HAMPSHIRE YANKEE'S OBJECTION TO CERTAIN DATA REQUESTS

New Hampshire Yankee objects to certain Data Requests of Ms. Nelkens, saying:

1. Attachment 1 hereto is a copy of Data Requests dated May 29, 1991 from Ms. Nelkens.

2. Although New Hampshire Yankee is proceeding to answer the great majority of those Requests, Requests 2a-d, 3, 4, and 11 are neither relevant to the present proceeding nor reasonably calculated to lead to the discovery of admissible evidence. (Although Request 2e could arguably be characterized also as neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, New Hampshire Yankee will nevertheless attempt to provide an answer to it, since it at least is directed to the approximate time of decommissioning).

THEREUPON, New Hampshire Yankee respectfully requests an order of the Committee that it need not answer Nelkens Data Requests 2a-d, 3, 4, and 11, and that it be granted such other relief as is just.

Respectfully submitted,

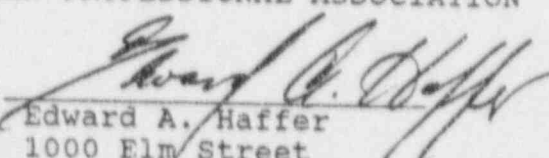
NEW HAMPSHIRE YANKEE

By Its Attorneys,

SHEEHAN, PHINNEY, BASS &
GREEN PROFESSIONAL ASSOCIATION

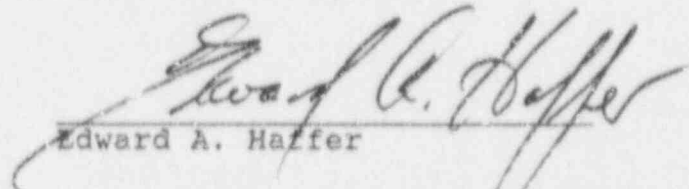
DATED: May 31, 1991

By:


Edward A. Haffer
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(603) 627-8115

CERTIFICATE OF SERVICE

I hereby certify that copies of this Objection were sent to the persons shown on the attached Service List.


Edward A. Hafler

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ATTACHMENT 1

MAY 29 1991

Pa 1

- ① According to the NRC, "currently available data for developing residual radioactivity criteria for a regulation on the decommissioning of lands and structures are inadequate." How has this information (from Impacts of Budget cuts on NRC's Ability to Assure Safety) been factored into budgetary decisions for Seabrook's decommissioning?
- ② According to the NRC, "regulatory controls [of the behavior and effects of certain radionuclides following deposition in the body] will continue to be based on assumptions" (from same source as in data request ①). With this in mind, please provide an estimate of all isotopes (in curies) that are ① presently on site, ② projected to be on site after two years of operation ③ ten years, ④ twenty years ⑤ forty years.
- ③ Please provide the most recent toxicological studies (i.e. ATSDS res.) on all isotopes mentioned in response to data request ②
- ④ Please give an estimate of the ① # of cancers, birth defects, etc. associated with each method of decommissioning ② the total costs associated with these ailments (include health care costs, lost labor costs, etc.)
- ⑤ Re: N2L-25-001
- ② 4.4.2 Please itemize ① the presently known tentative designs and site improvements ② when these are scheduled for implementation ③ costs associated with decommissioning each.
- ③ 4.4.13 ① what are the estimated # of kWh's needed to demolish S.S. ② the maximum # of MW at any point in time ③ the estimated cost of electricity (at what rate) ④ How will this cost be covered
- ④ 4.4.25 For > class C waste not covered by DOE's 1 mill/kwh surcharge ① what are the disposal alternatives if a HLW repository is not accepting waste ② what are the costs associated with each alternative for disposal/storage/handling.
- ⑤ § 61 Conclusion - Please calculate the total decommissioning costs substituting the "rates significantly higher than inflationary trends" for inflationary rate used in the estimate.
- ⑥ Appendix B-1 ① On what basis were parts of Seabrook Station determined to be non-contaminated at time of decommissioning? Please be specific as to comparable parts at other nuclear facilities in the process of being decommissioned and whether they are considered "clean" ② Are all parts of Seabrook station presently listed in Appendix B-1 presently non-contaminated? If not, give extent of contamination.

- 6) Is the costs for decommissioning are determined to be substantially higher than the amount set aside for that purpose, how will decommissioning expenses be met?
- 7) Re: La Guardia's testimony.
 - a) Please itemize the 1600 yds³ of material that can be decontaminated to levels permitting its release as clean scrap (Pg 11, lines 4-6)
 - b) Please provide detailed assessment of WRC negs. which are basis for a)
 - c) Please detail activities associated with post-operational spent fuel storage (Pg 11, lines 15, 16)
 - d) What is the basis for the presumption of transference of spent fuel to a dry storage? (Pg 12)
 - e) What would the dollar impact on decommissioning be if the presumption in d) is incorrect?
 - f) Please provide a breakdown of the management team. Is a radiation health physicist was a team member, please provide his/her credentials (Pg 2, Line 17)
 - g) Please provide those portions of AIF/NESP-036, DOE/EV/10108-1 & AIF/NESP-009 that deal with the environmental impacts of decommissioning and the costs associated " " " " " " " "
 - h) Why is the pricing structure for a new low level waste facility "still an unknown" (Pg 9, line 17). Please comment on any & all plausible or probable variables that could impact the pricing structure.
- 8) Please provide Sect. 5, Part 2 of Public Law 99-240
 - a) Have the penalties, (540.513), to go into effect as of Jan 1, '93, been factored into the estimated cost of decommissioning?
 - b) Is not planned? Do so explain why it was not in present calculations
 - c) How has the 25% of fund which shall be returned to the generator as per the Jan 1, 1993 milestone incentive been factored into the cost of decommissioning. (Include explanation of incentive)
 - d) What impact will the Jan 1, 1996 milestone incentive have on decommissioning cost? (Please include explanation of '96 incentive)
 - e) Please list possible sites within NH & the cost of acquiring each by eminent domain
- 9) What are the costs associated with the disposal of a) hazardous waste? b) mixed waste?
- 10) What are the costs associated with a) transferring HLW from dry cask storage to transfer casks, b) to the plant perimeter?
- 11) Please provide Findings R.P. 7-1, R.P. 9-1, CY.3-1, CY.3-2 from INPO Evaluation of Sept 89 updated status reports & all information from INPO Evaluation conducted Jan, 91 re: Radiological Protection (including solid radioactive waste and radioactive contamination control) & chemistry.