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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
FOR PUBLIC AFFAIRS

Before the Atomic Safety and Licensing Board

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

APPLICANT'S FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO
CITY OF PHILADELPHIA ON CONTENTION I-41

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740(b), and the Atomic Safety and Licensing Board's Memorandum and Order (October 28, 1983), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatories to the City of Philadelphia ("City") 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 the City produce for inspection and copying (or provide copies of) those documents designated by it in its 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.

2. The following definitions shall apply:
 - a. "City" shall refer to the City of Philadelphia or any official, 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 the City, 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 principal 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 City's possession and/or knowledge and information in the possession of city officials, officers, agents, representatives, consultants, and unless privileged, attorneys.

4. In each instance in which an interrogatory requests a statement of City's assertion, contention, view or opinion, the answer shall also contain a full discussion of the factual basis for the assertion or opinion.

Interrogatories

1. State whether the City intends to present any expert witnesses on the subject matter at issue in Contention I-41, as stated in Limerick Ecology Action's letter

dated September 28, 1983 and admitted by the Licensing Board in its Memorandum and Order dated October 28, 1983 (slip op. at 1). If so, identify each expert witness and 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 subject.

2. State whether the City intends to present any factual witnesses on the subject matter at issue in Contention I-41. If so, identify each such factual witness and further state (a) his professional qualifications; (b) the subject matter on which the witness is expected to testify; (c) the substance of the facts to which the witness is expected to testify. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this subject(s).

3. Identify by title, author, publisher and date of issuance or publication, all documents that the City relies upon as a basis for contentions or that the City intends to use (by way of reference or evidentiary proffer) in presenting its direct case in cross-examining other witnesses on Contention I-41 and all documents to which the City intends to refer in conducting cross-examination of other witnesses who may testify in connection with any such contention.

4. 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 the information provides a basis for your answer.

5. 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.

6. To the extent that your answer is based upon conversations, consultations or correspondence or other communications with one or more individuals or entities, please 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.

7. To the extent that the City possesses information or documents expressing facts or opinions which are relevant to the specific interrogatories below, but which do not support intervenor's position or which have not otherwise been fully provided in the answers thereto, please provide such information and documents.

8. Define the following terms as utilized in Contention I-41 as admitted in relationship to the Limerick Generating Station giving the specific basis or reference for such definitions. If you are aware that any of the definitions utilized by you differs from ones utilized by Applicant or NRC, state the comparable definition and discuss the specific differences; (a) safety systems; (b) non-safety systems; (c) systems interaction; (d) systems interaction analysis; (e) failure combinations.

9. Specify each and every way or instance in which Applicant or Staff has failed to take into account or improperly taken into account systems interaction in their analysis of the reliability of systems to determine whether there are reasonable assurances that the Limerick design adequately protects the public from credible accidents.

10. Specify each and every way or instance in which Applicant or Staff has failed to take into account or improperly taken into account classification and qualification of systems important to safety in their analyses of the

reliability of systems to determine whether there is reasonable assurance that the Limerick design adequately protects the public from credible accidents.

11. Specify each and every way or instance in which Applicant or Staff failed to properly determine which sequence of accidents should be considered within the design basis for Limerick.

12. Specify each and every way or instance in which Applicant's or Staff's determination of sequences of accidents to be included within the design basis of Limerick has failed to take into account systems interaction.

13. Specify each and every way or instance in which Applicant's or Staff's determination of sequences of accidents to be included within the design basis of Limerick failed to properly take into account classification and qualification of systems important to safety.

14. Specify each and every way or instance in which Applicant or Staff failed to or inadequately determined whether the design basis of the plant adequately protects against every such sequence determined by them to be within the design basis for Limerick.

15. Specify each and every way or instance in which Applicant or Staff failed to or inadequately took into account systems interactions in the determination of the adequacy of protection for sequences of accidents which they have included within the design basis for Limerick.

16. Specify each and every way or instance in which Applicant or Staff failed to or inadequately took into account classification and qualification of systems important to safety in the determination of the adequacy of protection for sequences of accidents which they have included within the design basis for Limerick.

17. Specify each and every way or instance in which Applicant or Staff failed to or inadequately applied proper systematic methodology such as the fault tree and event tree logic approach to analyze the reliability of systems to determine whether there is reasonable assurance that the Limerick design adequately protects the public from credible accidents.

18. Specify each and every way or instance in which Applicant or Staff failed to or inadequately applied proper systematic methodology to analyze the reliability of systems to determine whether there is reasonable assurance that the Limerick design adequately protects the public from credible accidents.

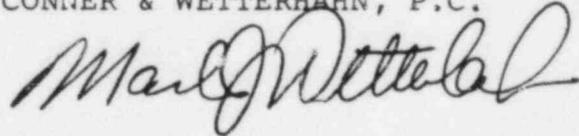
19. Specify each and every way or instance in which Applicant or Staff failed to or inadequately identified the items for the Limerick Generating Station to which General Design Criteria 1, 2, 3, 4, 10, 13, 21, 22, 23, 24, 29, 35, and 37 apply and to demonstrate compliance with these criteria.

Request for Production of Documents

Please attached to your answers to the interrogatories listed above a copy of all documents applicable to such answer or upon which you otherwise intend to rely in the presentation of your direct case or in the cross-examination of other witnesses, whether or not they support your contentions. Alternatively, please 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.

Respectfully submitted,

CONNER & WETTERHAHN, P.C.

A handwritten signature in black ink, appearing to read "Mark J. Wetterhahn", written in a cursive style.

Mark J. Wetterhahn
Counsel for Philadelphia
Electric Company

February 3, 1984