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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD '84 JUL 16 P1:02

In the Matter of)
)
ROCHESTER GAS AND ELECTRIC CORPORATION) Docket No. 50-244 0 L
)
(R.E. Ginna Nuclear Power Plant,)
Unit No. 1))

INTERROGATORIES

PROPOUNDED TO THE INTERVENOR

BY

ROCHESTER GAS AND ELECTRIC CORPORATION

Rochester Gas and Electric Corporation ("Applicant") requests that Michael R. Slade, Intervenor in the above-captioned proceeding ("Intervenor"), answer under oath and in accordance with all applicable rules of procedure the following interrogatories, basing such answers upon all information available to him.

In answering each interrogatory:

(a) Identify each document relied upon in preparing the answer.

(b) To the extent that the answer is not based upon any document, identify each person to whom the information furnished in the answer is a matter of personal knowledge.

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(c) Identify each person who assisted or participated in preparing and/or supplying any of the information given in answer to or relied upon in preparing the answer.

(d) Identify each person expected to be called by the Intervenor as a witness at the hearing, the subject matter on which he is expected to testify, and the substance of his testimony.

Definitions

"Identify" shall mean:

(i) With respect to a statute, regulation, rule, license provision, or technical specification, to set forth its citation in official form and to include its effective dates;

(ii) With respect to a person, to set forth his or her name, present or last known business and home addresses, and present or last known employer and position;

(iii) With respect to a document, to set forth its date, author, addressee, generic description (e.g., worksheet, letter, telex, etc.), substance, present custodian, and Nuclear Regulatory Commission or other reference number;

(iv) With respect to an oral communication or statement, to set forth each party thereto, the date and location thereof, the generic description thereof (e.g., telephone conversation, meeting, etc.), and the substance

thereof and to identify each document relating or referring thereto; and

(v) With respect to an act or occurrence, to set forth each person who participated; each person, who if not a participant, was present; the nature of the act or occurrence; the place and date of the act or occurrence; and each document that evidences, discusses, or relates to the act or occurrence.

In accordance with 10 C.F.R. § 2.740b(b), the Intervenor is required to serve a copy of his answers upon all parties to the proceeding within 14 days after service of the interrogatories. Furthermore, the Intervenor is under a duty promptly to amend his answers if, after he has submitted them, he obtains information upon the basis of which (i) he knows that the answer was incorrect when made, or (ii) he knows that the answer though correct when made is no longer true and the circumstances are such that a failure to amend the answer is in substance a knowing concealment. In addition, the Intervenor is under a duty promptly to supplement his answer to any question addressed to the identity of each person expected to be called as a witness at the hearing, the subject matter on which he is

expected to testify, and the substance of his testimony.
See 10 C.F.R. § 2.740(e).

Interrogatories

1. With respect to Contention A, paragraph a), identify by manufacturer, manufacturer's designation and/or serial number, and location at the Ginna facility those electric type valve operators for which malfunctions have not been corrected.

2. With respect to Contention A, paragraph c), (a) describe in detail what is "inadequate" about Applicant's operations program for inspection of activities affecting quality and how such program fails to meet the inspection criteria set forth in 10 C.F.R. Part 50, Appendix B, criterion X; (b) describe in detail what you contend Applicant should do to correct each of the "inadequacies" identified in your response.

3. With respect to Contention E, describe in detail the effect of cold shock on lake biota resulting from (a) emergency shutdown of the Ginna facility, and (b) recirculation of discharge water into the intake water during winter when lake ambient temperature falls below 37°F.

4. With respect to Contention K, (a) identify your criteria for determining when radwaste systems releases are at a level "as low as reasonably achievable"; (b) describe in detail what is "inadequate" about Applicant's radwaste systems management program and what you contend applicant should do to bring the radwaste systems releases at the Ginna facility to a level "as low as reasonably achievable."

LeBOEUF, LAMB, LEIBY & MacRAE

By Harry H. Voigt
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Attorneys for Rochester Gas and
Electric Corporation

July 13, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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CERTIFICATE OF SERVICE

I hereby certify that copies of "INTERROGATORIES PROPOUNDED TO THE INTERVENOR BY ROCHESTER GAS AND ELECTRIC CORPORATION" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, this thirteenth day of July, 1984.

Herbert Grossman, Esq., Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dr. Richard F. Cole
Administrative Judge
Atomic Safety and Licensing Board
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Washington, DC 20555

Dr. Emmeth A. Luebke
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