

DOCKETED
USNRC

'84 OCT 11 A11:09

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter Of:)	
)	
COMMONWEALTH EDISON COMPANY)	
)	Docket Nos. 50-456 0L
(Braidwood Nuclear Power)	50-457 0L
Station, Units 1 and 2))	

INTERROGATORIES TO INTERVENOR
BOB NEINER FARMS, INC., ET AL.

Applicant, Commonwealth Edison Company, hereby serves upon Intervenor Bob Neiner Farms, Inc., et al. written interrogatories pursuant to 10 C.F.R. §2.740b. Each interrogatory should be answered separately and fully in writing, under oath or affirmation, within 14 days after service.

Neiner Farms Contention 1

1. Identify the document(s) which or the person(s) whose opinion(s) provide(s) Intervenor's basis for the conclusion that 765 kV transmission lines create each of the following alleged conditions for persons who are within 600 feet of the line for six or more hours per day:

- a) audible noise impairing hearing;
- b) increasing tension;

- c) sleep interference;
- d) interference with the operation of cardiac pacemakers;
- e) biological effects on humans because of exposure to electric fields excluding the use of nearby areas for working, living, or recreation; and
- f) danger of shock to persons and animals.

2. State with particularity the basis for the assumption that 765 kV transmission lines will be constructed within 600 feet of where persons would have occasion to be for six or more hours per day. If persons exist who would have occasion to be within 600 feet of such lines for six or more hours per day, identify each such person by name and address.

3. State whether Intervenor agrees that the fields associated with parallel 345 kV and 765 kV lines would be, at worst, only slightly higher than an average of 2.4 kV/m (maximum 6.9 kV/m) for lines at a height of 1 m. (See Braidwood Final Environmental Statement (FES) at §5.5.1.2 and Braidwood Environmental Report-Operating License Stage (ER-OLS) at §3.9.6). If Intervenor disagrees with this conclusion, state with particularity the basis for such disagreement.

4. State whether Intervenor agrees with the NRC Staff's conclusions in the FES at §5.5.1.2 that "[f]or the most part, adverse effects have been demonstrated only for

higher fields (e.g., greater than 15 kV/m) or longer exposure times than would occur for people residing near or working under transmission lines." If Intervenor disagrees with this conclusion, state with particularity the basis for such disagreement.

Neiner Farms Contention 5

1. Identify the type of contamination with which Intervenor is concerned in Contention 5.

2. Define the level of contamination which Intervenor contends is unacceptable and the basis for that conclusion.

3. Define the mechanism or conduit by which Intervenor believes seepage from the cooling lake will occur.

4. State with particularity those aspects, if any, in which Intervenor believes the monitoring programs described in §5.9.3.4 and Table 5.7 of the FES and in §§6.1.2 and 6.1.5 of the ER-OLS are deficient for the purpose of detecting unacceptable groundwater contamination as defined by Intervenor in response to interrogatories 1 and 2 above.

5. In light of the NRC Staff's description of the soils around and beneath the cooling lake and the Staff's conclusion that the effect of seepage from the cooling lake

"on local ground levels will be negligible and will be restricted to the immediate perimeter of the cooling pond" (See FES at §4.3.1.5.2), state with particularity the basis for the contention that Applicant must establish an offsite monitoring program.

Neiner Farms Contention 6

1. State whether Intervenor contends that the environmental impact studies should consider the cumulative effects of discharges resulting from routine operation or resulting from a postulated accident.

2. Identify the types of chemicals contemplated by Intervenor in Contention 6.

Neiner Farms Contention 7

1. In light of the NRC Staff's analysis of and conclusions regarding the environmental impacts of postulated accidents described in §5.9.4 of the FES, state with particularity the basis for Intervenor's contention that "the potential that these facilities would have to be closed, either temporarily or permanently, due to the release of substantial quantities of radioactive materials during an accident creates an unacceptable environmental impact."

Neiner Farms Contention 10

1. State whether Intervenor's contention concerns air-borne or groundwater radioactive releases.

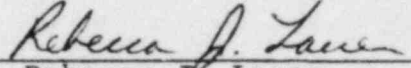
2. State whether Intervenor's contention concerns radioactive releases as a result of normal plant operation or as a result of a postulated accident.

3. State with particularity the basis for Intervenor's suggestion that the radiological environmental monitoring programs referenced in §5.9.3.4 of the FES are insufficient to provide adequate protection against possible cumulative radioactive doses.

Neiner Farms Contention 11

1. In light of the NRC Staff's conclusion that "it is highly unlikely that the dikes will fail due to heavy precipitation" (FES at §4.3.1.1.5) and that failure of the dikes will not cause loss of the minimum level assumed for the ultimate heat sink design-basis capability (Safety Evaluation Report, NUREG-1002 at §9.2.5; FES at §4.2.4.2), state with particularity the basis for Intervenor's Contention 11.

Submitted by:


Rebecca J. Lauer

One Of The Attorneys For
Applicant
COMMONWEALTH EDISON COMPANY

Joseph Gallo, Esq.
Victor G. Copeland, Esq.
ISHAM, LINCOLN & BEALE
1120 Connecticut Avenue, N.W.
Suite 840
Washington, DC 20036
(202) 833-9730

Rebecca J. Lauer, Esq.
ISHAM, LINCOLN & BEALE
Three First National Plaza
Suite 5200
Chicago, Illinois 60602
(312) 558-7500

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'84 OCT 11 11:08

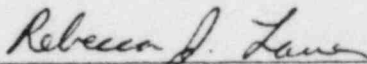
In the Matter Of:)
)
COMMONWEALTH EDISON COMPANY)
)
(Braidwood Nuclear Power)
Station, Units 1 and 2))

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket Nos. 50-456 OL
50-457 OL

CERTIFICATE OF SERVICE

I, Rebecca J. Lauer, one of the attorneys for Commonwealth Edison Company, certify that copies of the Interrogatories To Intervenor Bob Neiner Farms, Inc., Et Al. have been served in the above-captioned matter on those persons listed in the attached Service List by United States mail, postage prepaid, this 8th day of October, 1984.



Rebecca J. Lauer

ISHAM, LINCOLN & BEALE
Three First National Plaza
Suite 5200
Chicago, Illinois 60602
(312) 558-7500

DATED: October 8, 1984

SERVICE LIST

Marshall E. Miller, Esq.
Chairman
Administrative Law Judge
Atomic Safety and Licensing
Board
United States Nuclear Regulatory
Commission
Washington, DC 20555

Dr. Richard F. Cole
Administrative Law Judge
Atomic Safety and Licensing
Board
United States Nuclear Regulatory
Commission
Washington, DC 20555

Dr. A. Dixon Callihan
Administrative Law Judge
Union Carbide Corporation
P.O. Box "Y"
Oak Ridge, TN 37830

Myron Karman, Esq.
Office of the Executive Legal
Director
United States Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety and Licensing
Board Panel
United States Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety and Licensing
Appeal Board Panel
United States Nuclear Regulatory
Commission
Washington, DC 20555

Mr. Scott W. Stucky
Chief, Docketing and Services
United States Nuclear Regulatory
Commission
Office of the Secretary
Washington, DC 20555

C. Allen Bock, Esq.
P.O. Box 342
Urbana, IL 61801

Thomas J. Gordon, Esq.
Waalder, Evans & Gordon
2503 South Neil
Champaign, IL 61820

Ms. Bridget Little Rorem
117 North Linden Street
Essex, IL 60935

Jane M. Whicher, Esq.
BPI
109 North Dearborn Street
Suite 1300
Chicago, IL 60602

Ms. Lorraine Creek
Route 1
Box 182
Manteno, IL 60950

Erie Jones, Director
Illinois Emergency Services
and Disaster Agency
110 East Adams
Springfield, IL 62705