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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
ARIZONA PUBLIC SERVICE)	Docket Nos. STN 50-529 STN
COMPANY, <u>ET AL.</u>)	STN 50-530 STN
)	
(Palo Verde Nuclear Generating)	
Station, Units 2 and 3))	

NRC STAFF'S FIRST SET OF INTERROGATORIES TO
ARIZONA PUBLIC SERVICE COMPANY

In accordance with 10 C.F.R. Sections 2.740, 2.740b, and 2.741, the Staff hereby serves Arizona Public Service Company (Applicant) with the following interrogatories.

1. Each interrogatory shall be answered separately and fully in writing under oath or affirmation, and shall include all pertinent information available to Applicant, its officers, directors, employees, advisors, or counsel.

2. Give the name, address, occupation and employer of the person or persons answering each interrogatory and identify the portions of each interrogatory he answers.

3. As used herein the term "documents" shall mean all writings and records of every type in the possession, control or custody of Applicant, its directors, officers, attorneys, employees or agents,

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including, but not limited to, memoranda, correspondence, reports, surveys, evaluations, charts, books, minutes, notes, agenda, diaries, logs, transcripts, microfilm, accounting statements, telephone and telegraphic communications, speeches, and all other records, written, electrical, mechanical or otherwise. "Documents" shall also mean copies of documents, even though the originals are not in the possession, custody or control of Applicant or its consultants.

4. For all references to documents requested in these interrogatories, identify such documents by author, title, date of publication and publisher if the reference is published; and if it is not published, identify the document by the author, title, the date it was written, the qualification of the author relevant to this proceeding, and where a copy of the document may be obtained.

5. In your answer, repeat each interrogatory set forth herein and then set forth an answer thereto separately and fully. As to any interrogatory, section or subsection of said interrogatory that you refuse to answer or which is objected to for any reasons, separately state the grounds for any such refusal. Where a complete answer to a particular interrogatory, section or subsection of said interrogatory is not possible, such interrogatory, section or subsection should be answered to the extent possible and a statement made indicating the reason for the partial answer.

6. If the answer to any interrogatory is based upon conversations, consultations, correspondence or any other type of communications with one or more individuals (a) identify each such individual by name and address, (b) state the educational and professional background of

each such individual, (c) describe the information received from such individual and its relation to your direct answer, (d) identify each writing or record related to each such conversation, consultation, correspondence or other communication with such individual.

7. If differing or supplemental information or documents are later obtained by Arizona Public Service after answering these interrogatories, these interrogatory responses should be updated and the new information or documents promptly supplied.

INTERROGATORIES

INTERROGATORY 1

In the August 1984 study prepared by the University of Arizona entitled "An Assessment of Salt Drift on the Productivity of Agricultural Crops in the Vicinity of the Palo Verde Nuclear Generating Station" (hereinafter referred to as the "University of Arizona Study"), the last sentence at page 2, paragraph 3 of this study appears contradictory to the preceding sentence. To clarify this apparent incongruity, state whether the cotton plants in question which were subjected to saline treatments of 7.4, 74 and 370 lb/a/yr had greater or lesser yields than control plants treated with distilled water?

INTERROGATORY 2

At page 8, paragraph 2, the University of Arizona Study refers to "additional studies on drift loss, transport modeling, and monitoring" that have been commissioned by the Applicant, but fails to identify any

of these studies. If any of these "additional studies" have not been already furnished to the Staff and parties to this proceeding, supply all such studies and make available their underlying data for inspection.

INTERROGATORY 3

Section 4.2 of the University of Arizona Study fails to identify the type of fertilizer application, if any, for the field and greenhouse test plots. In regard to the possible use of fertilizer during the study, explain:

- a) Whether soil chemical analyses were performed on the field test plots prior to and during the test trials. If such analysis was performed, please furnish copies of these results.
- b) How fertilizer application rates in the greenhouse studies compared to fertilizer application rates in the field trials.

INTERROGATORY 4

Was wind speed measured as part of the monitoring done at Marana as referred to in Section 4.3 at page 53 of the University of Arizona Study? If available, provide all wind speed data recorded there.

INTERROGATORY 5

Describe the impact, if any, that the large storm which occurred in late September and early October 1983 (mentioned at page 86, paragraph 2 of the Study) had on field test trials?

INTERROGATORY 6

In view of what would appear to be a very high humidity reported for Marana in the last paragraph at page 135 of the Study, confirm whether this number is correct and, if possible, explain why it is as high as it is.

INTERROGATORY 7

In regard to cotton harvest yield rates referred to at page 136, paragraph 4 of the University of Arizona Study, explain why cotton plants treated with saline application rates of 500 lbs/a/yr had bolls that matured earlier than the control plants.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)

ARIZONA PUBLIC SERVICE)
COMPANY, ET AL.)

(Palo Verde Nuclear Generating)
Station, Units 2 and 3))

Docket Nos. STN 50-529
STN 50-530

CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF'S FIRST SET OF INTERROGATORIES TO ARIZONA PUBLIC SERVICE COMPANY in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 26th day of October, 1984:

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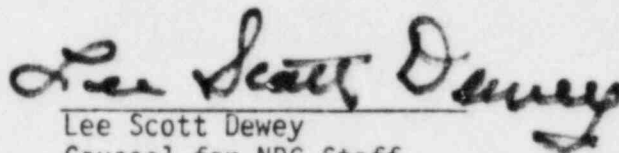
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