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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD
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In the Matter of

GULF STATES UTILITIES, CO.,
et al

Docket Nos. 50-458 *OL*
50-459 *OL*

(River Bend Station, Units 1 & 2)

ANSWERS TO APPLICANT'S
FIRST SET OF INTERROGATORIES

The State of Louisiana answers the Applicant's First Set of Interrogatories, which pertain to Contentions No. 1 and No. 2, as follows:

1. Requires no answer.
2. Requires no answer.
3. Requires no answer.

4. The state has not yet retained or interviewed expert witnesses for Contentions 1 or 2. It is possible that the state will have such witnesses. When the information requested in Interrogatory No. 4 is known by the state, it will be provided to applicant.

5. The state has not yet identified factual witnesses for Contentions 1 or 2. It is possible that the state will have such witnesses. When the information requested in Interrogatory No. 5 is known by the state, it will be provided to applicant.

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6. Insofar as Interrogatory No. 6 requests information to be used on cross-examination, it is objected to as premature. However, the state intends to use the current, or previous, versions of the RBS-FSAR and SER. As other documents are identified which will be used at the hearing, the information requested in No. 6 will be provided to applicant.

7. Requires no answer.

8. Requires no answer.

9. Requires no answer.

10. Requires no answer.

11. Inasmuch as the items referred to in Interrogatory No. 11 are available to all parties this question seems irrelevant. However, the state contends that applicant is obligated to comply with all regulations that are relevant to River Bend Station. This would include any which refer to asiatic clam infestation. The state is not obligated to do the Applicant's legal research. The contention is specifically addressed to the Applicant's compliance with I & E Bulletin 81-03, "Flow Blockage of Cooling Water to Safety Components by Corbicula (Asiatic Clam) and Mytilus (mussel)" and to "Report on Service Water System Flow Blockage by Bivalve Mollusks at Arkansas Nuclear one and Brunswick" by the Office for Analysis and Evaluation of Operational Data dated February, 1982. See also, Vol. 47, Federal Register, No. 92, Wednesday, May 19, 1982 Notices.

12. Inquiry by applicant as to matters of Applicant's activities seem designed to be more burdensome than aimed at obtaining relevant information. The state objects to Interrogatory No. 12. The state is not obligated nor able to identify every written document which could be conceivably relevant to the clam inquiry. Without in any way limiting this response to these documents, the state calls the attention of the applicant to their own letter dated February 14, 1983, which states in pertinent part, that GSU does not have sufficient data to make a detailed assessment of intrusion potential.

13. The applicant proposes a biofouling system consisting of chlorination with sodium hypochlorite. Chlorination may not be adequate in some systems. See "What Are We Doing About the Asiatic Clam", Energy Management, January, 1982; Good News: Corbicula Fluminea is Being Brought Under Control, Energy Management", July, 1982.

14. The applicant admits the clams are present in the river as is demonstrated by the Applicant's own monitoring. Whether or not clams presently exist at the site in sufficient quantity to present a problem is, in our opinion, a purely academic question as this clam has no enemies and is spreading throughout the area. The state is not aware of the experience of other plants on the Mississippi River with clams nor are they in a position to

obtain this information easily. Intervenor's do not have this information.

15. See No. 13 above.

16. See No. 13 above.

17. This information is presently unknown to the applicant, as is indicated by their letter of February 14, 1983. Until the applicant is better able to respond, the state will be unable to do so.

18. See No. 14 above.

19. Measures undertaken by applicant should be specified by applicant. Upon receipt of such information, the state will be able to respond to the rest of the question.

20. This question cannot be answered. See No. 17 above.

21. This question cannot be answered. See No. 17 above.

22. (a) Personal familiarity with the continuing problems of the Old River Control Structure obtained by living in the area.

(b) The state is not obligated to do the research for the applicant to locate all such reports including those not published. Specifically, see the following:

A. Louisiana Water Resources Research

•• Institute Bulletin 12, September 1980

"If the Old River Control Structure Fails"

by R. G. Kazmann and P. B. Johnson.

- B. "Water on the Mississippi", Discover March, 1983.
- C. Senate Hearings, "Old River Control Structure", 96th Congress.
- D. Rural Louisiana, "Taming Ole Man River" pages 6-7.
- E. Please note that Rural Louisiana is published by the Louisiana Association of Electric Cooperatives, a closely related entity to Applicant, Cajun Electric. LAEC is apparently of the opinion that the Old River Control Structure may not be salvagable.

23. This question asks the intervenors to generate mathematical probabilities which are based on such diverse factors as (1) meteorological conditions over the next thirty (30) plus years; (2) the willingness of Congress to appropriate money; (3) soil conditions under the Old River Control Structure; (4) the ability of the U.S. Army Corps of Engineers given sufficient finding and numerous other factors. The state believes that such probabilities cannot be calculated to any meaningful accuracy.

24. See documents referred in No. 22 above.

25. Unknown. There are failures which cannot be repaired.

26. See No. 22 above.

27. Unknown.

28. Unknown. Also, "Steady State Conditions" do not necessarily represent the point where River Bend would be affected. The question is rather, at what point the salinity of makeup cooling water for the reactor would be affected.

29. Failure of the Old River Control Structure presents a long term problem for the plant. It is not contended that the plant cannot be shut down safely assuming the adverse salinity conditions are identified. The contention is that the plant is not designed to operate with salt water and virtually every component of the cooling tower water system would be affected if the plant continued to operate under adverse salinity conditions. In addition, there could be a longer term adverse impact on well water used for the makeup water for the reactor condensate cycle. All regulatory requirements dealing with corrosion and state water quality criteria could potentially be violated.

30. All Sections dealing with corrosion at all points of the plant cooling system.

31. This question cannot be fully answered at this time, however, at a minimum, facilities should be provided to desalinate cooling tower make up water.

32. See the Kazmann and Johnson article referred to in No. 22 above.

33. Unknown. See answer to No. 22.

34. Obviously, the Mississippi River is not going to direct itself into the channel it now occupies. Unknown. See answer to No. 22.

35. Unknown. See answer to No. 22.

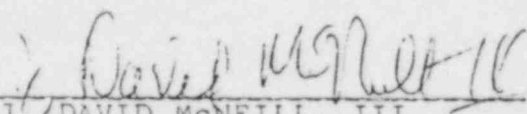
36. Unknown. See answer to No. 22.

37. Unknown, except that there would be a substantial increase.

Respectfully submitted,

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