

RELATED CORRESPONDENCE

11/16/84
DOCKETED
USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 NOV 19 AM 11:34

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

GEORGIA POWER CO.
et al.

(Vogtle Electric Generating Plant,
Units 1 and 2)

Docket Nos. 50-424
50-425
(OL)

NRC STAFF'S SECOND SET OF INTERROGATORIES
TO CAMPAIGN FOR A PROSPEROUS GEORGIA (CPG) AND
GEORGIANS AGAINST NUCLEAR ENERGY (GANE)

Pursuant to 10 CFR §§2.740, 2.740b and 2.741, the NRC Staff
propounds the following Interrogatories to CPG and GANE.

Instructions

The "Instructions" set out at pages 1-3 of the "NRC Staff's
Interrogatories to Campaign for a Prosperous Georgia (CPG) and Georgians
Against Nuclear Energy (GANE)" dated November 1, 1984, are incorporated
by reference herein. A copy of the November 1, 1984, Interrogatories is
attached.

Interrogatories

INTERROGATORY 1

Interrogatory 1 of the Staff's "Interrogatories" dated November 1,
1984, is incorporated by reference herein (with specific reference to
Contention 8 as restated in the Board's "Memorandum and Order" dated
November 5, 1984).

8411200193 841116
PDR ADOCK 05000424
G PDR

DS07

INTERROGATORY 2

Interrogatory 2 of the Staff's Interrogatories" dated November 1, 1984, is incorporated by reference herein (with specific reference to Contention 8 as restated in the Board's "Memorandum and Order" dated November 5, 1984).

INTERROGATORY 3

With respect to Contention 8, please state the specific structures, systems and components you allege have been affected by Applicants alleged failure to implement a quality assurance program within the context of Contention 8.

INTERROGATORY 4

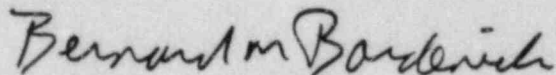
State the specific facts you rely upon to support the general allegations contained in Contention 8 to the effect that Applicants (a) have not properly documented the placement of concrete, (b) have not adequately tested concrete, (c) have not adequately prepared correct concrete quality test records, (d) have not procured material and equipment that meet applicable standards, (e) have not protected equipment, and (f) have not taken corrective action.

INTERROGATORY 5

In regard to Contention 8, fully set forth (a) each document you maintain should have been prepared that was not prepared, (b) the matters those documents should have set forth, (c) each incomplete document, (d) the matters not covered that should have been covered, (e) each test not

conducted and what such tests should have covered, (f) each concrete quality test report inadequately prepared and matters omitted therefrom, (g) each piece of material or equipment that did not meet applicable standards, (h) each standard such material or equipment did not meet and the specific manner in which it did not meet such standards, (i) each piece of equipment not adequately protected, the inadequate protection, adequate protection and every code or standard relied upon setting forth adequate protection relevant to that equipment, and (j) each instance of corrective action that was not taken that should have been taken, a full description of the details of such corrective actions, and each document, code or standard evidencing the "corrective action" that should have been taken.

Respectfully submitted,



Bernard M. Bordenick
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 16th day of November, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER COMPANY
et al.

(Vogtle Electric Generating Plant,
Units 1 and 2)

Docket Nos. 50-424
50-425

NRC STAFF'S INTERROGATORIES TO CAMPAIGN
FOR A PROSPEROUS GEORGIA (CPG) AND
GEORGIANS AGAINST NUCLEAR ENERGY (GANE)

Pursuant to 10 CFR § 2.740, 2.740b and 2.741, the NRC Staff
propounds the following Interrogatories to CPG and GANE.

INSTRUCTIONS

1. Each Interrogatory set forth below shall be answered separately and fully in writing under oath or affirmation, and shall include all pertinent information available to CPG or GANE, their respective officers, directors, members, employees, advisors, or consultants.
2. State the name, address, occupation and employer of the person or persons answering each Interrogatory and identify the portions of each Interrogatory such person has answered.
3. As used herein the term "Documents" shall be construed to mean all writings and/or records of every type in the possession, control or custody of either CPG or GANE, their respective directors, officers, attorneys, employees or agents, including, but not limited to,

Aug 2
84H060292

PDR
8/28

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 be construed to mean copies of documents even though the originals thereof are not in the possession, custody or control of CPG or GANE, their respective members or 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, and the date it was written.

5. As to any Interrogatory, section or subsection of the following Interrogatories that you refuse to answer or to which you object, for any reason, 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 of said Interrogatory should be answered to the extent possible and a statement made indicating the reason for the partial or incomplete answer.

6. Identify by author, title and date any documents used as the basis for the answer to each Interrogatory.

7. If the answer to any Interrogatory is based upon a calculation, describe (a) the calculation, (b) identify any documents setting forth such calculation, (c) identify the person who performed each calculation, (d) when it was performed, (e) each parameter used in such calculation, each value assigned to the parameters, and the source

of your data, (f) the results of each calculation, and (g) how each calculation provides basis for the answers.

8. 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, and (d) identify each writing or record related to each such conversation, consultation, correspondence or other communication with such individual.

9. As used in these interrogatories, the word you shall mean CPG or GANE or any agent or employee of CPG or GANE.

INTERROGATORIES

INTERROGATORY 1

Identify all documentary or other material that you intend to rely on during this proceeding to support CPG/GANE Contentions 7, 8, 10.1, 10.3, 10.5, 10.7, 11, 12 and 14 or which you may offer as exhibits on these contentions or refer to in preparation for or during your cross-examination of NRC Staff or Applicant witnesses. Provide, if available, copies of any documents you intend to rely on.

INTERROGATORY 2

- a) Identify each person you rely on to substantiate in whole or in part the CPG/GANE Contentions set out in Interrogatory 1 above.
- b) Provide the address and educational and professional qualifications of all persons named in your response to 2a above.
- c) Identify which of the above persons or any other persons you may call as witnesses at a hearing on the contentions set out in Interrogatory 1 above, and identify which portions of each Contention set out in Interrogatory 1 above that each such person will support.

INTERROGATORY 3

With respect to Contention 7, which asserts that Applicants have not adequately addressed the value of the groundwater below the Plant Vogtle site and fails to provide adequate assurance that the groundwater will not be contaminated, please state a) the basis for your belief that an accidental spill of radioactive water on the Vogtle site could result in radioactive contamination of either the shallow or deeper aquifers under Plant Vogtle; (b) the basis for your belief that the Tuscaloosa aquifer may not be isolated from the surface to the Plant Vogtle site; and c) the basis for your belief that any or all deep aquifers are hydraulically connected anywhere in the vicinity of the plant.

INTERROGATORY 4

Subcontention 10.1 (Integrated Dose v. Dose Rate) alleges that Applicants' testing methods are inadequate because the Applicants only

use high levels of radiation or integrated dose. In support of this subcontention you cite research performed at Sandia Laboratory for the proposition that many materials, including polymers found in cable insulation and jackets, seals, rings and gaskets, may experience greater damage from lower dose rates. State whether the research performed at Sandia forms the sole basis for subcontention 10.1. If not, please state the full and complete basis for the assertions made in the subcontention in question.

INTERROGATORY 5

Subcontention 10.3 (Cable in Multiconductor Configurations) cites a Sandia study (not identified) for the proposition that in tests of EPR cable material, multiconductor configurations performed "substantially worse than single conductor configurations and that qualification testing implying only single conductors may not be representative of multiconductor performance." You further allege that the results of this report have not been considered in Applicants' testing program.

a. State the full name of the report, the author, the report number and publication date of the Sandia study cited in support of subcontention 10.3.

b. Is the study identified in response to interrogatory 5a the sole basis for subcontention 10.3? If not, please state the additional bases which you allege support the subcontention.

c. State the full bases for your assertion that the results of the Sandia report must be considered in Applicants' testing program.

INTERROGATORY 6

Subcontention 10.5, which challenges the qualification of solenoid valves used at Vogtle, is based on test results performed by ASCO and Franklin Research Center and upon an NRC Board Notification issuance. Are the test results and Board Notification issuance the sole bases in support of subcontention 10.5? If not, please state the full and complete bases for the allegations contained in the subcontention. In addition, state the full name or title of the test results, the authors, test or report number and date of issuance of the test results in question. If available to you, attach copies of any such test results.

INTERROGATORY 7

State in detail the showing CPG and GANE believe the Applicants must make to demonstrate, as set out in Contention 11, their basis for confidence that no unacceptable radiation releases will occur as a result of steam generator tube failures occasioned by vibration-induced fatigue cracking and by bubble collapse within the Vogtle steam generators.

Respectfully submitted,

Bernard M. Bordenick

Bernard M. Bordenick
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 1st day of November, 1984

Dan Feig
1130 Atlanta Avenue
Atlanta, GA 30307 -

Atomic Safety and Licensing
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section*
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

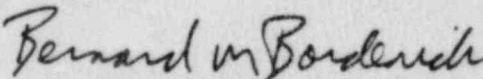
James E. Joiner, Esq.
Troutman, Sanders, Lockerman,
& Ashmore
127 Peachtree Street, N.W.
Atlanta, GA 30043

Tim Johnson
Executive Director
Educational Campaign for
a Prosperous Georgia
175 Trinity Avenue, S.W.
Atlanta, GA 30303

Laurie Fowler, Esq.
Legal Environmental Assistance
Foundation
1102 Healey Building
57 Forsyth Street, N.W.
Atlanta, GA 30303

Atomic Safety and Licensing
Appeal Board Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Ruble A. Thomas
Southern Company Services, Inc.
P.O. Box 2625
Birmingham, AL 35202



Bernard N. Bordenick
Counsel for NRC Staff

Dan Feig
1130 Atlanta Avenue
Atlanta, GA 30307

Atomic Safety and Licensing
Board Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section*
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

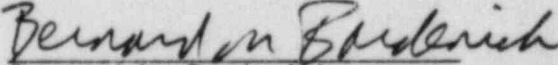
James E. Joiner, Esq.
Troutman, Sanders, Lockerman,
& Ashmore
127 Peachtree Street, N.W.
Atlanta, GA 30043

Tim Johnson
Executive Director
Educational Campaign for
a Prosperous Georgia
175 Trinity Avenue, S.W.
Atlanta, GA 30303

Laurie Fowler, Esq.
Legal Environmental Assistance
Foundation
1102 Healey Building
57 Forsyth Street, N.W.
Atlanta, GA 30303

Atomic Safety and Licensing
Appeal Board Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Ruble A. Thomas
Southern Company Services, Inc.
P.O. Box 2625
Birmingham, AL 35202


Bernard N. Bordenick
Counsel for NRC Staff