

November 28, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)	
VIRGINIA ELECTRIC & POWER COMPANY)	Docket Nos. 50-338 OLA-1
(North Anna Nuclear Power Station,)	50-339 OLA-1
Units 1 and 2))	(Receipt of Spent Fuel)

OFFICE OF SECRETARY
SERVICE

NRC STAFF INTERROGATORIES AND REQUEST
FOR DOCUMENTS FROM CONCERNED CITIZENS OF
LOUISA COUNTY REGARDING CONSOLIDATED CONTENTION 1

The NRC staff hereby requests that Concerned Citizens of Louisa County (CCLL) pursuant to 10 C.F.R. §§ 2.740b & 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce or make available for inspection and copying, all documentary material identified in responses to interrogatories below. Each response to the interrogatories below shall be under oath or affirmation of the individual(s) who contributed thereto. For all references requested in these interrogatories, identify them 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 qualifications of the author relevant to this proceeding, and where a copy of the document may be obtained.

Consolidated Contention 1

The Staff's Environmental Assessment is inadequate and an Environmental Impact Statement should be prepared. The bases for this contention are two-fold. First, the Environmental Assessment, in relying upon the inapplicable values in Table S-4, did not evaluate the probability and consequences

of accidents occurring during the transportation of spent fuel casks from the Surry Station to the North Anna Station or which might be occasioned by acts of sabotage or by error of Applicant's employees in preparing the casks for shipment. Second, contrary to the National Environmental Policy Act, 42 U.S.C. 4332(2)(E), consideration was not given to the alternative method of constructing a dry cask storage facility at the Surry Station which is feasible, can be effected in a timely manner, is the least expensive and safest method for at least 50 years, and can be used on or offsite. ^{1/}

- 1-1 a. Upon what person or persons do you rely to substantiate in whole or in part your position on Consolidated Contention 1?
- b. Provide the addresses and education and professional qualifications of any persons named in your response to a. above.
- c. Identify which of the above persons or any other person you may call as witnesses on this contention.
- 1-2 Provide summaries of the views, positions or proposed testimony on Consolidated Contention 1 of all persons named in response to Interrogatory 1-1, that you intend to present as witnesses during this proceeding.
- 1-3 State the specific bases and references to any documents upon which the persons named in response to Interrogatory No. 1-1 rely to substantiate their views regarding Consolidated Contention 1.
- 1-4 With regard to Consolidated Contention 1 identify all documentary or other material that you intend to use during this proceeding to support this contention and that you may offer as exhibits on this

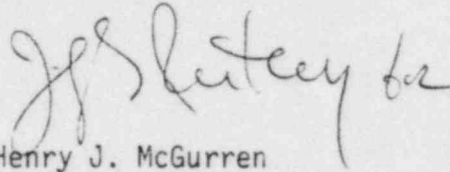
^{1/} The wording of Consolidated Contention 1 conforms to that accepted by the Licensing Board in its Memorandum and Order dated October 15, 1984.

contention or refer to during your cross-examination of witnesses presented by the Applicant and/or the NRC staff.

- 1-5 With regard to Consolidated Contention 1 specifically identify the "accidents occurring during the transportation of spent fuel casks from Surry Station to North Anna" that you assert the Staff failed to evaluate in its Environmental Assessment. In your answer to this interrogatory provide for each "accident" any analysis, data, or basis concerning the probability or consequences of such "accident."
- 1-6 With regard to Consolidated Contention 1 specifically identify the "accidents" which you assert might be occasioned by acts of sabotage. In your answer to this interrogatory provide for each "accident" any analysis, data, or basis concerning the probability or consequences of such "accident."
- 1-7 With regard to Consolidated Contention 1 specifically identify the "accidents" which you assert might "be occasioned ... by error of Applicant's employees in preparing the casks for shipment." In your answer to this interrogatory provide for each "accident" any analysis, data, or basis concerning the probability or consequences of such "accident."
- 1-8 Provide the basis for your assertions in Consolidated Contention 1 that construction of a dry cask storage facility at Surry Station: (a) is feasible, (b) can be effected in a timely manner, and (c) is the least expensive and safest method for at least 50 years. In your

answer to this interrogatory provide any data or analysis that support your assertions (a), (b), and (c) above.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "H. McGurren for".

Henry J. McGurren
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 28th day of November, 1984

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF INTERROGATORIES AND REQUEST FOR DOCUMENTS FROM CONCERNED CITIZENS OF LOUISA COUNTY REGARDING CONSOLIDATED CONTENTION 1" 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 28th day of November, 1984:

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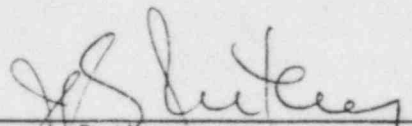
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