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RELATED CORRESPONDENCE

March 19, 1985  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

Docket Nos. 50-456 OL  
50-457 OL

NRC STAFF INTERROGATORIES AND REQUEST  
FOR DOCUMENTS TO BOB NEINER FARMS, INC.

The NRC Staff hereby requests that the Intervenor, Bob Neiner Farms, Inc., pursuant to 10 C.F.R. §§ 2.740 and 2.741 and the presiding Licensing Board's "Order Beginning Discovery" (March 4, 1985), answer separately and fully, in writing under oath or affirmation within 14 days after service, the following interrogatories and produce or make available for inspection and copying, all documentary material identified in the admitted contentions and responses to the interrogatories below. To the extent that copies of the documentary material cannot or will not be provided to the NRC Staff, access for inspection and copying should be provided at a mutually agreeable time and place. 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.

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If Neiner Farms considers any document called for in this request to be privileged from production, Neiner Farms must include in its response to its request a list of documents withheld from production, identifying each document by date, addressee(s), author, title and subject matter. In addition, Neiner Farms should identify those persons who have seen the document or who were sent copies, and state the ground(s) upon which each such document is considered privileged.

The Interrogatories set forth below are to be considered Neiner Farms' continuing obligation in accordance with 10 C.F.R. § 2.740(e). Accordingly, if, after Neiner Farms has answered these interrogatories, additional information comes to its attention with respect to one or more of the answers, concerning identify of witnesses or corrections of any of the answers, the answers should be amended in a timely manner to provide such additional information.

Bob Neiner Farms, Inc. Contention 1

Intervenors contend that the 765 Kv transmission lines that will be used to transport the electrical output from the Braidwood Station create an unacceptable, hazardous and dangerous condition to persons living or working on a daily basis within 600 feet from the closest line, and that the 765 Kv transmission lines should not be placed closer than 600 feet from any structure or area in which people can be expected to be present six or more hours per day. The hazardous and dangerous conditions include: audible noise impairing hearing, increasing tension, interfering with sleep, interfering with speech; interference with the operation of cardiac pacemakers; biological effects on humans because of exposure to electric fields excluding the use of nearby areas for working, living or recreation, and the danger of shock to persons and animals.

The basis for this contention is that Commonwealth Edison testified before the Illinois Commerce Commission that as of March 3, 1978, approximately 60% of all transmission right-of-way acquisitions included right-of-way for 345 Kv and 765 Kv transmission lines. Opinion No. 78-13, involving Case No. 26529, issued by the Public Service Commission of New York discusses the hazards associated with 765 Kv lines.

1. Provide a copy of the testimony of Commonwealth Edison before the Illinois Commerce Commission which is cited in Contention 1.

2. Provide a copy of Opinion No. 78-13, involving Case No. 26529, issued by the Public Service Commission of New York discussing the hazards associated with 765 Kv lines.

Bob Weiner Farms, Inc. Contention 7

Within ten miles of Braidwood Station there are public and private recreational facilities with a total annual attendance of 1,053,873 persons (Table 2.2-7 ER-LOS)

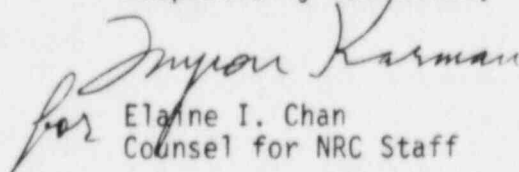
Intervenors contend that the potential that these facilities would have to be closed, either temporarily or permanently, due to the release of substantial quantities of radioactive materials during an accident creates an unacceptable environmental impact.

1. Define the standard of acceptability being applied in this contention relative to:

- (a) The recreational importance of each facility and the various combination of facilities which may be closed;
- (b) The length of time and the season(s) during which facility may be closed.

2. Does the Intervenor intend to perform any analyses related to Contention 7? Is the intervenor aware of plans of anyone else to perform such analyses? If the answer is yes to either question provide the name, title and affiliation of the primary individual intending to perform the analysis. Also, describe the scope and content of proposed analyses.

Respectfully submitted,

*for*   
Elaine I. Chan  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 19th day of March, 1985



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

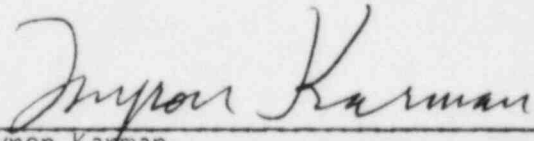
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