

RELATED CORRESPONDENCE

April 15, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

Docket Nos. 50-456OL
50-457OL

OFFICE OF SECRETARY
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BRANCH

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 Ruling on Admissibility of Neiner Contentions 4 and 8" (April 9, 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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Identify by name, title or position, and address all persons Intervenor intends to present as witnesses to testify with regard to Neiner Farms' Contention 4.

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 identity 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 4:

Intervenors contend that the proximity of the Illinois Central Railroad to the plant site and the use of the rail system to transport explosive materials from the Joliet, Illinois arsenal and other plants or depositories creates an unacceptably hazardous condition not considered by the Atomic Safety and Licensing Board, which issued the partial initial decision on environmental and site suitability matters for the Braidwood Station (LBP-75-1, 8 AEC 1197 (January, 1975)). At the construction permit stage the analysis of the probability of an explosion was inadequate in that:

- a) the six-month period during 1974 for which the traffic from the Joliet arsenal was analyzed is not representative of other traffic periods in the past and may not be representative of the traffic to be expected in the future.

- b) the analysis of the traffic was based on peacetime traffic only.
- c) only the probability of accidental or inadvertent explosions were assessed and the probability of sabotage or purposefully caused explosions were not explored.

INTERROGATORY 1

Is the Intervenor aware of any evidence (other than exhibit A of the proposed revisions and amendments to their contention(s) which supports any of the following with respect to the Joliet Arsenal facility:

- a) Plans to "reactivate", "enlarge", or "modernize",
- b) Plans to budget "between \$300,000,000 and \$420,000,000" for reactivation and enlargement, or
- c) Plans for the production of a "new chemical-based explosive."

If the answer is yes, identify all such evidence (e.g. documents, reports, studies) and provide complete citations.

INTERROGATORY 2

Has the Intervenor obtained any evidence or performed analyses which establish a quantitative relationship between the contended reactivation and enlargement of the facility operations and the frequency of explosives shipments on the Illinois Central Railroad near the Braidwood site. If the answer is yes, identify the evidence (e.g. documents, studies) and provide complete citations.

INTERROGATORY 3

Is the Intervenor aware of the technical bases and assumptions used by the Staff in determining the Braidwood, Unit 2 safety evaluation findings regarding the explosives shipments on the Illinois Central Railroad? If the answer is yes, identify relevant documents or reports and provide complete citations.

INTERROGATORY 4

Part of Contention 4 alludes to the use of the Illinois Central Railroad for transport of explosive materials from "other plants or depositories". Has the Intervenor established the extent of the contribution of such shipments to the overall traffic of explosives on the Illinois Central Railroad? If the answer is yes, identify the evidence (documents, studies, reports, analyses) which support the Intervenor's estimates.

INTERROGATORY 5

Has the Intervenor estimated the overpressures that may impact the Braidwood safety-related structures in the event of an explosives detonation on the Illinois Central Railroad? If the answer is yes, identify all relevant documents, studies, or analyses, and provide complete citations. Indicate the assumptions and the methodology used in making the estimates.

INTERROGATORY 6

Has the Intervenor estimated the probability of an explosion of an explosives shipment on the Illinois Central Railroad near the Braidwood site? If the answer is yes, identify all relevant documents, studies, or analyses, and provide complete citations. Indicate the assumptions and the methodology used in making the estimates, including the traffic frequency.

INTERROGATORY 7

Is the Intervenor aware of the maximum overpressures that the Braidwood, Unit 2 safety-related structures are designed to withstand? If the answer is yes, identify the relevant documents, studies, or reports which support your understanding of the capabilities of Braidwood, Unit 2 safety-related structures to withstand detonation overpressures.

INTERROGATORY 8

Is the Intervenor aware of the nature and composition of the explosives that were being shipped from the Joliet Arsenal during the six-month period in 1974 referred to in Contention 4? If the answer is yes, identify all relevant documents and reports and provide complete citations.

INTERROGATORY 9

With respect to the contention that "new chemical-based explosives" are being considered for production at the Joliet Arsenal, is the Intervenor aware of the specific nature of these explosives in terms of their blast characteristics? If the answer is yes, identify relevant documents and reports, and provide complete citations.

Respectfully submitted,

Elaine I. Chan

Elaine I. Chan
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 15th day of April, 1985

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I hereby certify that copies of "NRC STAFF INTERROGATORIES AND REQUEST FOR DOCUMENTS TO BOB NEINER FARMS, INC." 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 15th day of April, 1985:

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