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RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Before the Atomic Safety  
and Licensing Board

In the Matter of )  
)  
VIRGINIA ELECTRIC AND POWER COMPANY) Docket Nos. 50-338/339  
) OLA-1  
(North Anna Power Station, )  
Units 1 and 2) )

APPLICANT'S REQUEST FOR PRODUCTION  
OF DOCUMENTS AND INTERROGATORIES  
TO CONCERNED CITIZENS OF LOUISA COUNTY

Virginia Electric and Power Company (the Applicant) hereby requests Concerned Citizens of Louisa County (CCLC) to produce at 2000 Pennsylvania Ave., N.W., Washington, D.C., or at another mutually agreed upon location, each of the documents described below, within thirty days after service of this request, in accordance with 10 C.F.R. § 2.741. In addition, the Applicant propounds the interrogatories set forth below to which CCLC is asked to respond within fourteen days in accordance with § 2.740b. These discovery requests pertain to Consolidated Contention 1 admitted by the Atomic Safety and Licensing Board in its Memorandum and Order of October 15, 1984 in the North Anna license amendment proceedings (OLA-1).

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DEFINITIONS

A. "CCLC" means any member, employee, representative, consultant, agent, technical advisor, attorney or other person acting for or on behalf of CCLC or at CCLC's direction, or in concert with CCLC or assisting CCLC.

b. "Document" means any handwritten, typewritten, printed or recorded graphic matter however produced or reproduced, whether or not in the possession, custody or control of CCLC and whether or not claimed to be privileged against discovery on any ground, including but not limited to, reports, records, lists, memoranda, correspondence, telegrams, schedules, photographs, sound recordings, brochures and written statements of any person.

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

C. The words "pertaining to" include referring to, relating to, connected with, concerning, comprising, memorializing, commenting on, regarding, discussing, showing,

describing, reflecting, analyzing, supporting and contradicting.

SUPPLEMENTATION OF RESPONSES

CCLC must supplement its responses in accordance with 10 C.F.R. § 2.740(e).

DOCUMENT REQUEST

1. All documents pertaining to the risk of accidents, including accidents associated with sabotage or human error, resulting from the transportation of spent nuclear fuel by truck.
2. All documents pertaining to dry-cask storage of spent fuel.

INTERROGATORIES

1. Identify the person or persons whom CCLC relies upon to substantiate in whole or in part CCLC's positions with respect to Consolidated Contention 1.
2. Provide the addresses and educational and professional qualifications of each person identified in CCLC's response to Interrogatory 1.
3. Identify those persons listed in response to Interrogatory 1 whom CCLC will or may call as a witness in this proceeding.
4. Provide a summary of the views, positions or proposed testimony of each person listed in response to Interrogatory 1.

5. Identify all documents and other material that CCLC intends to use during this proceeding to support Consolidated Contention 1 and that CCLC may offer as an exhibit in this proceeding or refer to in connection with the examination in this proceeding of any witness.

6. Identify each document upon which a person listed in CCLC's response to Interrogatory 1 may rely to substantiate his or her views regarding Consolidated Contention 1.

7. Describe the accidents that could occur during the transportation of spent fuel casks from Surry to North Anna, the probability of each such accident and the consequences CCLC would expect to result from each such accident.

8. Describe the basis for and any data or analyses that tend to support CCLC's responses to Interrogatory 7.

9. Describe the forms of sabotage that could result in accidents occurring during the transportation of spent fuel casks from Surry to North Anna, the probability of each such form of sabotage and the consequences CCLC would expect to result from each such form of sabotage.

10. Describe the basis for and any data or analyses, that tend to support CCLC's responses to Interrogatory 9.

11. Describe, for each form of sabotage listed in response to Interrogatory 9, what would be required of the saboteurs in terms of planning, equipment, personnel skills, staffing and execution.

12. Describe the ways in which, and the extent to which, compliance with 10 C.F.R. § 73.37 would be inadequate to prevent a successful sabotage effort.

13. Describe precisely the respects in which human error by Applicant's employees in preparing casks for shipment could result in accidents occurring during the transportation of spent fuel casks from the Surry Station to the North Anna Station, the probability of each such error and the consequences CCLC would expect to result from each such error.

14. Describe the basis for and any data or analyses that tend to support CCLC's responses to Interrogatory 13.

15. Indicate the ways in which, and the extent to which, compliance with Applicant's procedures governing the loading, unloading and handling of spent fuel casks would be inadequate to prevent the errors described in CCLC's response to Interrogatory 13.

16. Indicate whether there are any unresolved conflicts over the use of available resources involved in this proceeding and, if there are any, list them.

17. Specify why dry cask storage at Surry is the "safest" method for spent fuel disposal.

18. Specify the basis for CCLC's contention that dry cask storage can be "effected in a timely manner."

19. Indicate the basis for CCLC's contention that dry cask storage is "feasible."

20. Identify the documents named in CCLC's responses to Interrogatories 5 and 6 by author, title, date of publication and publisher if the reference is published; if the reference is not published, identify the document by the author, title, date it was written and qualifications of the author relevant to this proceeding, and indicate where a copy of the document may be obtained.

21. Indicate whether the Staff has erroneously concluded in its Safety Evaluation Report that the probability of a sabotage event is remote and that attempted sabotage, if successful, would not produce serious radiological consequences. If the response is "yes," state the basis for CCLC's response.

22. Indicate in what significant ways Applicant's proposal is different from the proposal in the Duke transportation case where the Commission held that the transportation by truck of 300 spent fuel assemblies over a 170 mile distance neither presented a substantial national resources commitment question nor significant environmental impacts (14 NCR at 322)

Respectfully submitted,

VIRGINIA ELECTRIC AND POWER  
COMPANY

By /s/ Michael W. Maupin  
Michael W. Maupin, Counsel

Of Counsel

Michael W. Maupin  
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Dated: December 14, 1984

CERTIFICATE OF SERVICE

I hereby certify that I have this day served Applicant's Request for Production of Documents and Interrogatories to Concerned Citizens of Louisa County upon each of the persons named below by depositing a copy in the United States mail, properly stamped and addressed to him at the address set out with his name:

Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555  
Attention: Chief Docketing and Service Section

Sheldon J. Wolfe, Chairman  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

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

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

By: /s/ Michael W. Maupin  
Michael W. Maupin, Counsel  
for Virginia Electric and  
Power Company

Dated: December 14, 1984