726

RELATED CORRESPONDENCE CCLC, 12/15/84

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CONCERNED CITIZENS OF LOUISA COUNTY
REQUEST FOR PRODUCTION AND
INTERROGATORIES TO VEPCO

Pursuant to 10 CFR § 2.740b, Intervenor Concerned Citizens of Louisa County requests that the following interrogatories be answered fully, in writing and under oath, by one or more officers or employees of Virginia Electric and Power Company (VEPCO) who has personal knowledge thererof of, or is the closest to having personal knowledge thererof. The interrogatories impose upon VEPCO a continuing obligation. If, after answering a question, additional pertinent information comes to the attention of VEPCO, its employees or consultants, the previous answer should be amended.

Each question is to be answered in six parts, as follows:

A. Provide the direct answer to the question.

B. Identify all documents and studies, and the

D503

particular parts thereof, relied upon as the basis for the answer.

C. Identify all other documents in VEPCO's possession which pertain to the subject matter of the question.

D. Identify the person providing the answer to the question. If more than one person answered the question, indicate the respective portions answered by each. In addition, identify all other VEPCO employees or consultants who have the expert knowledge required to answer the question.

E. Explain whether VEPCO is aware of any ongoing or planned research bearing on the question. Please identify such research.

F. Identify the employee(s) or consultant(s), if any, whom VEPCO intends to have testify on the subject matter of the question. Provide a statement of the qualifications of such persons.

The term document is to be construed broadly to include all writings, whether handwritten or not. It includes documents from all sources, including those which were not prepared by or for VEPCO, as well as those which were intended only for limited distribution, e.g., memos to the file and telecon notes. It also includes graphs, charts, and drawings of every kind.

Question 1. Please supply the following information for each of the four commercial reactors (i.e., Surry 1 & 2, North Anna 1 & 2) operated by VEPCO:

a. How many assemblies are contained in a full core?

b. Set forth the refueling history and the future refueling schedule for the reactor, including the number of assemblies replaced, or scheduled for, replacement. Please include in the answer a description of the burnup rates to which the fuel was, or will be, subjected.

c. Describe the fuel used in the reactor including vendor, assembly dimensions (including weight), and degree of enrichment. If this data has changed since the reactor was first licensed, please explain.

d. What is the observed rate of cladding failure for fuel used in the reactor? Please use and describe your own standards for failure.

2. Please supply the following information for each of the spent fuel storage pools at Surry and North Anna:

a. As currently configured, what is the maximum storage capacity for the pool? Please specify the storage capacity of the cask loading area.

b. What is the maximum capacity permitted by VEPCO's license for the plant?

c. How many spent fuel assemblies are now stored in the pool?

3. Has VEPCO undertaken any in-house or external studies of the possibility of expanding its spent fuel storage capacity

at Surry or North Anna? This question excludes VEPCO's 1982 application to the Nuclear Regulatory Commission for approval of a dry-cask storage facility at Surry, but includes any study of (1) other kinds of new storage facilities and (2) expanded use of the existing spent fuel pools, such as but not limited to more closely-spaced poison racks, double-tiering of racks, and "pin consolidation" or "densification." Please provide copies of the pertinent documents.

4. Is it VEPCO's position that it is important (for any reason) to maintain a "full core reserve" in its spent fuel pools? If so, please explain and provide copies of all pertinent documents, whether they support VEPCO's position or not.

5. The following questions relate to VEPCO's application to the NRC for authority to construct a dry-cask storage facility at Surry.

a. What is the status of VEPCO's application?

b. What is the planned capacity of facility?

c. Summarize the projected construction schedule for the facility, assuming that full NRC approval is received on (1) February 1, 1985 and (2) August 1, 1985. Please include a description of all construction activities that are now underway, or that have been completed.

d. Please provide a copy of all documents in VEPCO's possession pertaining to the economic or technical feasibility of dry cask storage of spent fuel.

e. Please provide a copy of all correspondence be-

tween VEPCO and the NRC pertaining to dry cask storage of spent fuel.

6. Has VEPCO performed studies of the economic costs of spent fuel transportation? If so please provide copies.

7. Has VEPCO performed studies of the human health and environmental effects of spent fuel transportation? If so, please provide copies.

8. Has VEPCO examined the proposed Surry-to-North Anna transportation route(s) to identify population centers, safe havens, traffic levels, road hazards, or environmentally sensitive areas (such as drinking water supplies)? If so, please provide copies of documents pertaining to such examinations.

9. Has VEPCO examined the proposed transportation route(s) to determine what kind of emergency response skills and equipment are possessed by the governmental departments and agencies that might be expected to respond in the event of an accident? If so, please provide copies of all pertinent documents.

10. Please identify the shipping casks that VEPCO plans to use to transport spent fuel from Surry to North Anna. Have any defects or safety hazards ever been associated with these casks? If so, please explain.

11. Is VEPCO aware of analyses of what would happen to a

spent fuel cask if it were involved in a transportation accident (including a fire)? If so, please provide copies of all pertinent documents.

12. Please provide copies of all documents in VEPCO's possession pertaining to the role of emergency personnel in mitigating the effects of transportation accidents.

13. Is is VEPCO's position that sabotage or diversion of a spent fuel shipment is not a significant threat to human health or the environment? If so, please explain and provide copies of pertinent documents.

14. In an affidavit dated December 21, 1982 and submitted to the Licensing Board by VEPCO on December 22, 1982, Marvin L. Smith referred to two "windows" during which it was important for VEPCO to make the proposed spent fuel shipments. Please identify the basis for determining those windows. Have any similar windows been identified for the future? If so, please explain how they were determined.

Respectfully submitted,

James B. Dougherty
Counsel for Concerned
Citizens of Louisa County

3045 Porter St. NW
Washington DC 20008
(202)362-7158

December 15, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I certify that copies of the foregoing CONCERNED CITIZENS OF LOUISA COUNTY REQUEST FOR PRODUCTION AND INTERROGATORIES TO VEPCO were served, this 15st day of December, 1984, by deposit in the United States Mail, First Class, upon the following:

Secretary
U.S. Nuclear Regulatory Comm'n
Washington DC 20555

Dr. Jerry Kline
Atomic Safety and
Licensing Board
U.S. Nuclear Regulatory Comm'n
Washington DC 20555

Henry J. McGurren, Esq.
U.S. Nuclear Regulatory Comm'n
Washington DC 20555

Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory Comm'n
Washington DC 20555

Michael W. Maupin, Esq.
Hunton & Williams
P.O. Box 1535
Richmond VA 23212

Sheldon J. Wolfe, Chairman
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Comm'n
Washington DC 20555

Dr. George A. Ferguson
School of Engineering
Howard University
2300 5th Street, NW
Washington DC 20059

Atomic Safety and
Licensing Appeal Board
U.S. Nuclear Regulatory Comm'n
Washington DC 20555

James B. Dougherty