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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
GEORGIA POWER COMPANY, et al. )  
 )  
(Vogtle Electric Generating Plant, )  
Units 1 and 2) )

Docket No. 50-424 OLC  
50-425 OLC

APPLICANTS' FIRST SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS

These interrogatories and request for production of documents are directed to Joint Intervenors Campaign For a Prosperous Georgia/Georgians Against Nuclear Energy and pertain to contentions accepted by the Atomic Safety and Licensing Board in its "Memorandum and Order on Special Prehearing Conference Held Pursuant to 10 C.F.R. § 2.715a" (Sept. 5, 1984).

The interrogatories are filed pursuant to 10 C.F.R. § 2.740b, which requires that they be answered separately and fully in writing under oath or affirmation. According to stipulation, such answers shall be served within 30 days after service of the interrogatories. Stipulation of Parties on Discovery Schedule, ff. Tr. at 144. The interrogatories are intended to be continuing in nature, and the answers must be immediately

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supplemented or amended, as appropriate, should Intervenors obtain any new or differing information responsive to the interrogatories.

The request for production of documents is filed pursuant to 10 C.F.R. § 2.741, which requires that Intervenors produce and either furnish copies of, or permit Applicants to inspect and copy, any documents that are responsive to the request and that are in the possession, custody, or control of Intervenors. In accordance with the stipulation of the parties and with 10 C.F.R. § 2.741, such production must be effected within 30 days after service of this request. The request for production of documents is also continuing in nature, and Intervenors must produce immediately any documents they obtain which are responsive to the request.

#### I. INSTRUCTIONS

The following instructions and definitions apply to Applicants' interrogatories and request for production of documents.

When identification of a document is requested, briefly describe the document (i.e., letter, memorandum, book, pamphlet, etc.) and state the following information as applicable to the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document. When identification of a person is

requested, state that person's full name, present employer or business affiliation, present address, and present telephone number.

1. "VEGP" means the Vogtle Electric Generating Plant, Units 1 and 2.

2. "Intervenors," "you," or "your" refers to Georgians Against Nuclear Energy (GANE) and/or Campaign for a Prosperous Georgia (CPG), and all members, employees, agents, consultants, attorneys, or other representatives of GANE or CPG.

3. "Correspondence" shall be construed broadly and shall mean letters; all recordings, transcriptions, and notes of telephone calls or conversations; inter-office and intra-office memoranda; telegrams; telex messages; notes; and reports.

4. "Document" means any handwritten, typed, printed, graphic, photographic, mechanically recorded, computer stored, filmed, or other verbal or pictorial matter of whatever character, however produced or reproduced, of any kind and description. "Document" shall also mean every copy of a document when such copy is not an identical duplicate of the original.

5. "CP-ER" refers to the VEGP construction permit stage Environmental Report.

6. "FSAR" refers to the VEGP Final Safety Analysis Report.

7. "OL-ER" refers to the VEGP operating license stage Environmental Report.

## II. INTERROGATORIES

In answering each interrogatory, please recite the interrogatory before providing the response.

### A. Specific Interrogatories

#### Contention 7 (Groundwater)

7-1. In Contention 7, Intervenors state that "Applicant has not addressed the value of the groundwater. . . ." Explain the basis for this statement.

7.2. Identify and explain any specific inadequacies that you contend exist in Applicants' assessment of different accidental spillage in the CP-ER at §§ 2.5.4 and 5.4.3.2, and OL-ER at § 7A.4.

7-3. Intervenors' Contention 7 also states that "Applicant fails to provide adequate assurance that the groundwater will not be contaminated. . . ." Explain the basis for this statement.

7.4. Intervenors state that "groundwater underlying the Vogtle plant is a valuable resource whose protection . . . cannot be assured by [Applicants]." Explain the basis for this statement.

7.5. Identify and explain any specific inadequacies that you contend exist in Applicants' liquid waste management system as described in the FSAR at § 11.2.

7.6. Identify and explain any specific inadequacies that you contend exist in Applicants' assessment of possible accidental releases in FSAR at § 15.7 and OL-ER at §§ 7.1, 7A.

7.7. Identify and describe in detail the sequence of hydrologic units beneath the VEGP site and the geologic formations that comprise or separate those units.

7-8. Intervenors contend that the water table aquifer below VEGP is a source of drinking water and agricultural supply. Identify the precise location of all wells that draw from the water table aquifer below VEGP and that are used for these purposes.

7.9. Intervenors also contend that the water table aquifer below VEGP is used by some commercial establishments. Identify all such commercial establishments, describe their use of the water table aquifer beneath VEGP, and identify the precise location of the wells used by these establishments to draw from the water table aquifer.

7-10. Taking into account the direction of groundwater flow and the effect of intercepting streams, describe the manner in which you contend that a spill at VEGP would reach any of the wells identified in your response to Interrogatory Nos. 7.8 and 7.9.

7-11. Do Intervenors disagree with the assertion that the water table aquifer at VEGP is on an interfluvial high isolated from surrounding water table aquifers, as described in the CP-ER at § 2.5.4, OL-ER at 2.1.3.8.1.2, and FSAR at § 2.1.12.1.2.3.? If so, explain the basis for disagreeing with this assertion.

7-12. Do Intervenors contend that radioactive contaminants in the water table aquifer below the VEGP site could reach and migrate across Beaverdam Creek? If so, explain the precise mechanism for such migration.

7-13. How long do you contend it would take radioactive contaminants released to the water table aquifer at the VEGP site to reach and migrate across Beaverdam Creek? Explain how the response was calculated or estimated.

7-14. How far south of the VEGP site do you contend that the marl changes to a limestone formation?

7-15. Identify any other locations where you contend the marl changes to a limestone formation. Include in your response the direction and distance from the plant to such formation.

7-16. Do Intervenors contend that radioactive contaminants reaching the water table aquifer below the VEGP site could migrate to the point south of the site where Intervenors assert the marl changes to a limestone formation? If so, explain the precise mechanism for such migration.

7-17. If Intervenors contend that radioactive contaminants reaching the water table aquifer below VEGP could migrate to the point south of the site where the marl purportedly changes to a limestone formation, state how long such migration would take. Explain how the response was calculated or estimated.

7-18. Do Intervenors disagree with the statement in the CP-ER at § 2.5.4 that radioactive contaminants released to the

water table aquifer below the plant site would eventually find their way to Mathes (also known as Mallard) Pond? If so, explain precisely the basis for your disagreement.

7-19. If Intervenors disagree with the statement that radioactive contaminants released to the water table aquifer below VEGP would find their way to Mathes Pond, state in what direction such contaminants would travel and how long they would take to reach the plant site boundary. Explain the basis for your response.

7-20. Do Intervenors disagree with the 350 year estimate in the CP-ER at § 5.4.3.2 and in the FSAR at § 2.4.13.1 of the time it would take a spill at Plant Vogtle to reach Mathes (also known as Mallard) Pond? If so, state the basis for such disagreement.

7-21. What is Intervenors' estimate of the time it would take a spill to reach Mathes Pond? Explain your calculation.

7-22. Do Intervenors disagree with the assertion that the marl beneath the water table aquifer at VEGP forms an effective aquiclude? If so, explain the basis for disagreeing with this assertion.

7-23. Do Intervenors disagree with the assertion in Applicants' Response to GANE and CPG Supplements to Petitions for Leave to Intervene (May 7, 1984) at 44 n.29 that the 50 foot pressure differential between the water table aquifer and tertiary aquifer (upper confined or Lisbon Sands aquifer, hereinafter referred to as tertiary) or cretaceous aquifer (lower

confined or Tuscaloosa aquifer, hereinafter referred to as cretaceous) demonstrates the effectiveness of the marl as an aquiclude? If you disagree, explain the basis for disagreeing with this assertion.

7-24. Describe the precise mechanism(s) and pathways by which you contend that radioactive releases from VEGP could reach the cretaceous aquifer or the tertiary aquifer and include in the description an estimate of the time it would take.

7-25. Explain in detail the basis for Intervenor's assertion that the marl below the water table aquifer at VEGP has fractures or permeable sections. Identify all documents that refer to or discuss such fractures or permeable sections.

7-26. Identify the location of any fractures or permeable sections of the marl.

7-27. Do Intervenor's contend that fractures in or permeable sections of the marl provide a path for migration of contaminants in the water table aquifer to the cretaceous or tertiary aquifers? If so, explain in detail the basis for this contention and identify all documents that support it.

7-28. With respect to groundwater, identify each section of 10 C.F.R. Part 51, as currently amended and renumbered, that Intervenor's contend Applicants do not satisfy.

7-29. With reference to specific regulatory language of each section identified in response to Interrogatory No. 7-28, explain why Intervenor's contend that Applicants are not in compliance with that section.



7-30. Provide any information that Intervenors have concerning the location of wells in the vicinity of VEGP.

7-31. Identify and describe in detail the sequence of hydrologic units beneath the Savannah River Plant and the geologic formations that comprise or separate those units.

7-32. Explain, with reference to the specific regulatory language, why Applicants are not in compliance with 10 C.F.R. § 50.34(a)(1) (1984).

7-33. Explain, with reference to the specific regulatory language, why Applicants are not in compliance with 10 C.F.R. § 100.10(c)(3) (1984).

7-34. Identify each person you expect to call as an expert witness with respect to Contention 7. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

Contention 10.1 (Integrated Dose v. Dose Rate)

10.1-1. Identify the specific polymers that have been shown in NUREG/CR-2157 to be susceptible to differing dose-rate effects (i.e. greater degradation at low dose rates than at a high dose rate during environmental qualification testing), and for each, identify all documents discussing or referring to such susceptibility.

10.1-2. Identify any safety-related equipment at VEGP that Intervenor know contain such polymers.

10.1-3. For each of the polymers identified in response to Interrogatory No. 10.1-1, provide the following information:

- a) At approximately what total integrated dose do Intervenor contend that differing dose-rate effects become discernible?
- b) Describe the effect discerned at that total integrated dose with reference to specific mechanical and electrical properties.
- c) Explain the basis for the response to (a) and (b) above.
- d) Identify all documents that support or otherwise relate to the response to (a), (b), and (c) above.

10.1-4. Do Intervenor contend that differing dose-rate effects on the polymers identified in response to Interrogatory No. 10.1-1 have been observed in actual operational experience at any nuclear power plant? If so, provide the following information:

- a) At what plant(s) have such effects been discerned?
- b) Quantify the effects for each such plant and polymer.

c) Identify all documents discussing or referring to dose-rate effects observed in actual operational experience.

10.1-5. With respect to seals, rings, gaskets, or other mechanical equipment containing the polymers identified in response to Interrogatory No. 10.1-1, do Intervenors contend that a maintenance/surveillance program is not an acceptable method to detect and correct irradiation effects? If Intervenors contend that such a program is not an acceptable method of detecting and correcting irradiation effects, explain the basis for the response.

10.1-6. Identify each person whom you expect to call as an expert witness with respect to Contention 10.1. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also, describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

Contention 10.3 (Multiconductor Configurations)

10.3-1. Identify precisely the SANDIA study or studies referred to by Intervenors in support of their proposition that in tests of EPR cable material, multiconductor configurations performed "substantially worse" than single conductor configurations.

10.3-2. Identify all documents referring to or discussing the study identified in your response to Interrogatory No. 10.3-1 above.

10.3-3. Identify every multiconductor, other than those discussed in NUREG/CR-3538, which Intervenors contend has performed "substantially worse" in qualification tests than did the corresponding single conductor. Include in the identification the precise multiconductor configuration, its insulating material, and its jacketing material.

10.3-4. Describe the precise chemical or physical mechanism(s) that have caused any multiconductor configuration to perform "substantially worse" than the corresponding single conductor in environmental qualification tests.

10.3-5. For each multiconductor identified in response to Interrogatory No. 10.3-3 above, describe the precise environmental conditions under which the multiconductor performed substantially worse than the corresponding single conductor.

10.3-6. Do Intervenors contend that any material other than chlorinated polyethelene jacketing in multiconductor configurations causes a multiconductor configuration to perform substantially worse than the corresponding single conductor configuration in environmental qualification tests? If so, explain the basis for your response and identify all documents that support it.

10.3-7. Identify any insulating or jacketing material other than chlorinated polyethelene that Intervenors claim

would be subject to the same mechanism described in the response to Interrogatory No. 10.3-4 above. Provide the basis for your response and identify all documents supporting it.

10.3-8. Identify each person whom you expect to call as an expert witness with respect to Contention 10.3. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also, describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

Contention 10.5 (Solenoid Valves)

10.5-1. Identify the specific model numbers of the ASCO solenoid valves that failed tests at the Franklin Research Center and that are listed in the FSAR at § 3.11 as being used in safety-related applications at VEGP.

10.5-2. Identify the precise test conditions under which the ASCO solenoid valves failed environmental qualification tests at Franklin Research Center.

10.5-3. In the Franklin Research Center tests, did test temperatures to which the solenoid valves were exposed exceed 400H?

10.5-4. If the response to Interrogatory No. 10.5-3 is yes, state by how much the test temperatures exceeded 400H and explain why the Franklin Research Center test results are applicable to VEGP.

10.5-5. Identify all documents which refer to or discuss the Franklin Research Center tests of the ASCO solenoid valves.

10.5-6. Explain the basis for Intervenors' statement that "several valves manufactured by ASCO failed early after exposure to 340 degrees...." Identify the model number(s) of the valves in question and all documents that support this statement.

10.5-7. What is the basis for Intervenors' statement that "... ASCO's own testing had shown poor performance of these valves..."? Identify the model number(s) of the valves in question, the date of the test, and all documents that support this statement.

10.5-8. Identify each person whom you expect to call as an expert witness with respect to Contention 10.5. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also, describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

Contention 10.7 (Hydrogen Recombiners)

10.7-1. Explain in detail why Intervenors contend that Applicants' environmental qualification of the VEGP hydrogen recombiner is inadequate.

10.7-2. Identify all documents which relate to the adequacy of the environmental qualification of the VEGP hydrogen recombiner.

10.7-3. Identify each person whom you expect to call as an expert witness with respect to Contention 10.7. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also, describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

Contention 11 (Unresolved Safety Issues)

11-1. Define the term "bubble collapse" and explain what phenomenon intervenors refer to when intervenors use this term.

11.2. Do intervenors contend that "bubble collapse" is not a type of water hammer? If so, explain why and identify all documents that support the response.

11-3. Identify all NRC documents which define or explain the term "bubble collapse."

11-4. Explain in detail the basis for intervenors' assertion that Westinghouse PWR steam generator tubes have shown evidence of degradation due to bubble collapse. Identify all documents that support your response.

11-5. Describe the precise mechanism by which intervenors contend that the VEGP steam generator tubes are susceptible to damage due to bubble collapse.

11-6. What improvements in the VEGP steam generators, if any, do Intervenors contend are necessary to avoid tube damage due to bubble collapse?

11-7. Identify any instance where bubble collapse has damaged steam generator tubes, and all documents discussing or referring to such instances.

11-8. Explain in detail the basis for your contention that Westinghouse PWR steam generator tubes have shown signs of vibration induced fatigue cracking. Identify all documents that support your response.

11-9. Explain in detail the basis on which you contend that degradation due to vibration induced fatigue cracking might be encountered in the Westinghouse Model F steam generators used at VEGP.

11-10. Identify any instance where vibration induced fatigue cracking has been detected in the tubes of any Westinghouse steam generator.

11-11. What do you contend would be the source(s) of vibration that might induce fatigue cracking in the tubes of a Westinghouse Model F steam generator.

11-12. Do Intervenors deny that vibration induced fatigue cracking is a phenomenon that has been associated only with once-through (non-Westinghouse) steam generators? If so, explain the basis for the denial and identify all documents that support your position.



11-13. Do Intervenors contend that Applicants' analysis of flow-induced vibration in the FSAR at § 5.4.2.3.3 is inadequate or incorrect? If so, explain in detail why the analysis is inadequate or incorrect.

11-14. Identify each person whom you expect to call as an expert witness with respect to Contention 11. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also, describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

Contention 12 (Cooling Tower Releases)

12-1. Define "salt" as the Intervenors use that term in Contention 12.

12-2. Do Intervenors disagree with the Applicants' salt deposition estimate provided in the OL-ER in response to questions E290.8 and E451.17? If so, explain precisely why Applicants' estimate is in error.

12-3. Do Intervenors disagree with Applicants' methodology for estimating and bounding salt deposition as described in Licensee's letter to the NRC Staff dated September 25, 1984, and in the OL-ER in response to questions E290.8 and E451.17? If so, explain why.

12-4. Do Intervenors disagree with Applicants' cooling tower drift parameters (e.g. the salt concentration in drift or drift rate) as described in the OL-ER in response to question E290.8? If so, explain why.

12-5. Describe in detail what you contend would be the precise environmental effect of salt deposition as estimated by Applicants. Identify all documents on which Intervenors' description of this effect is based.

12-6. What types of vegetation do Intervenors contend could be harmed by salt deposition from the VEGP cooling towers?

12.7. With respect to each type of vegetation identified in response to Interrogatory No. 12-6, what level of salt deposition do Intervenors contend would cause harm?

12-8. What is Intervenors' estimate of salt deposition from the VEGP cooling towers? Describe in detail the basis for that estimate and identify all documents which support or otherwise relate to that estimate.

12-9. Describe the precise environmental effect of salt deposition as estimated by Intervenors. Identify all documents on which Intervenors' description of this effect is based.

12-10. Define "chlorine gas" as Intervenors use the term in Contention 12.

12-11. Describe the chemical reactions that Intervenors contend would occur when chlorine is injected into the cooling tower water at VEGP.

12-12. Do Intervenors agree that chlorine injected into the cooling tower water will hydrolyze? If so, what do Intervenors contend is the rate of reaction and how complete is the hydrolysis at standard temperature and pressure? If Intervenors do not agree that the chlorine will hydrolyze, explain in detail the basis for disagreement.

12-13. If chlorine were injected into the cooling tower water to obtain an initial, momentary concentration of 10 ppm, what concentration of chlorine gas in the cooling tower water do Intervenors contend would exist after hydrolysis?

12-14. Describe and explain in detail the precise mechanical and chemical actions that Intervenors contend would result in the emission of chlorine gas from the VEGP cooling towers.

12-15. Assuming injection of chlorine into the water in an amount sufficient to obtain an initial concentration of 10 ppm and based on the cooling tower parameters specified in the OL-ER in response to question E290.8, how much chlorine gas would be emitted from the cooling towers?

12-16. Assuming the validity of the cooling tower parameters specified in the OL-ER in response to question E290.8 and that approximately 420 lbs of chlorine would be injected into the cooling tower water over two thirty-minute periods each day, what amount of chlorine gas do Intervenors estimate would be emitted from each cooling tower each day?

12-17. What percentage of the amount of chlorine gas that Intervenors estimate will be emitted from the cooling towers

would reach the ground? Describe in detail the basis for the response and identify all documents which support that response.

12-18. What would be the environmental effect of the chlorine gas that Intervenors estimate would be released from the cooling towers? Describe in detail the basis for the response and identify all documents that support the response.

12-19. Identify each person whom you expect to call as an expert witness with respect to Contention 12. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also, describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

#### Contention 14 (Diesel Generators)

14-1. Specify all defects claimed by Intervenors to have occurred in diesel generators manufactured by Transamerica Delaval, Inc. (TDI) and state whether each such defect is the result of the design or of the manufacture of the generators.

14-2. For each defect identified in response to Interrogatory No. 14-1, identify all documents that describe the defect, its discovery, reporting, or correction.

14-3. To what common mode failures do Intervenors claim that the VEGP diesel generators are subject? Explain the basis

for your response and identify all documents that support the response.

14-4. With respect to the VEGP diesel generators, in what manner do Intervenors contend that Applicants' QA/QC program was or is deficient?

14-5. In what manner do Intervenors contend that TDI's QA/QC program was or is deficient?

14-6. Explain the basis for Intervenors' statement that Applicants failed to properly assess the suitability of the TDI diesel generators.

14-7. Do Intervenors contend that there are any problems with the VEGP diesel generators that have not been adequately corrected? If so, identify each such problem precisely, and if corrective action has been taken, explain why such action was inadequate.

14-8. Identify each person whom you expect to call as an expert witness with respect to Contention 14. For each such person, state the subject matter on which he is expected to testify, the substance of the facts and opinions to which he is expected to testify, and a summary of the grounds for each such opinion. Also, describe the educational and professional qualifications of each such person, and identify any previous proceeding in which that person has testified.

B. General Interrogatories

G-1 List separately for each interrogatory response the name, title or position, address, and employer of each person who provided information used in preparing that response.

G-2 List separately for each interrogatory response each document that Intervenors used or referred to in preparing the response to that interrogatory.

G-3 Identify each document requested by Applicants' Request for Production of Documents for which Intervenors claim a privilege against production. Include in the identification all addressees or recipients of the original or copy of the document, a brief description of its subject matter, and the nature of the privilege claimed.

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that Intervenors respond in writing to the following request for production of documents and produce or make available for inspection and copying at a designated location each of the documents requested below that are in the possession, custody, or control of Intervenors.

A document shall be deemed to be within the "control" of the Intervenors if Intervenors have ownership, possession or custody of the document or a copy thereof, or have the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

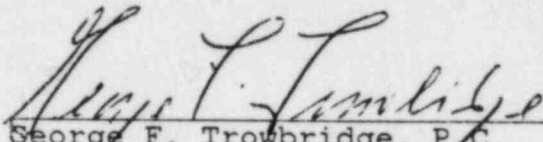
Documents Requested

1. Applicants request that Intervenor produce or make available for inspection and copying each and every document identified or described in the answer to any of the specific interrogatories above.

2. Applicants request that Intervenor produce or make available for inspection and copying each and every document that Intervenor used or referred to in preparing the response to any of the specific or general interrogatories above.

3. Applicants request that Intervenor produce or make available for inspection and copying all correspondence between Intervenor and anyone else concerning any of the admitted contentions.

Respectfully submitted,



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Dated: November 5, 1984

November 5, 1984

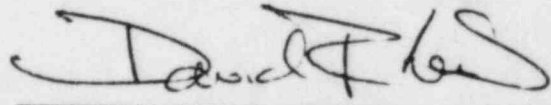
UNITED STATES OF AMERICA  
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' First Set of Interrogatories and Request for Production of Documents," dated November 5, 1984, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, or where indicated by an asterisk (\*) by hand delivery, this 5th day of November, 1984.



David R. Lewis

Dated: November 5, 1984



UNITED STATES OF AMERICA  
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