



8/4/84-8/15/84;" "Technical Summary of the A/M Groundwater Remedial Action Program," J. L. Steel, Dupont draft report, ca. 3/84; "Assessment of the Presence of Volatile Organic Compounds of Water Supply Well 53A-A/M Area, Savannah River Plant," Geraghty & Miller, Dupont subcontractor report, 1983; "Delaval Diesel Generating Operating Experience," unpublished summary of TDI problems as described in NRC and other documents in the public record; "IE Information Notice No. 83-58: Transamerica Delaval Diesel Generator Crankshaft Failure" (SSIN No. 6835, IN 83-58), U. S. NRC Office of Inspection & Enforcement, August 30, 1983; "IE Information Notice No. 83-51: Diesel Generator Failures" (SSIN No.: 6835, IN 83-51), U.S. NRC Office of Inspection & Enforcement, August 5, 1983; "Evaluation for a Significant Deficiency/Evaluation for a Substantial Safety Hazard," attached to a letter from D. O. Foster (Georgia Power Company) to James P. O'Reilly (NRC), August 6, 1982; Letters from R. E. Boyer (TDI) to Director, Office of Inspection & Enforcement, NRC, December 9, 1981 and September 27, 1983; report attached to letter from Foster to O'Reilly, March 1, 1983; "Transamerica Delaval has supplied the DSR and DSRV engines to the following sites...", unpublished summary of problems with TDI generators; and "Transamerica Delaval, Incorporated Vendor Program Branch Inspection History Summary of Nine Inspections During 1979-1983."

#### Interrogatory 2

a) Identify each person you rely on to substantiate in whole or in part the CPG/GANE Contentions set out in Interrogatory 1 above. b) Provide the address and educational and professional qualifications of all persons named in your response to 2a above. c) Identify which of the above persons or any other persons you may call as witnesses at a hearing on the contentions set out in Interrogatory 1 above, and identify which portions of each Contention set out in Interrogatory 1 above that each such person will support.

RESPONSE: Dr. Howard Deustch, Professor of Chemistry, Georgia Institute of

Technology, 765 Myrtle Street, N.E., Atlanta, Georgia 30308; Carol Gelbaum, 1714 N. Holly Lane, Atlanta, Georgia 30329, geologist formerly with State of Georgia and Georgia Institute of Technology; Professor William Lawless, Paine College, P. O. Box 12172, Augusta, Georgia 30904, formerly employed in management of nuclear waste operations at Savannah River Plant (Mr. Lawless will testify regarding groundwater); Dr. James Ruttenber, medical doctor and Ph.D. ecologist, Myrtle Street, Atlanta, Georgia 30308; Doug Teper, 1253 Lenox Circle, Atlanta, Georgia 30306, frequent intervenor in regulatory cases; Tim Johnson, Campaign for a Prosperous Georgia, 175 Trinity Avenue S.W., Atlanta, Georgia 30303, trained by National Association of Regulatory Utility Commissioners, former staff of Consumers' Utility Counsel and Public Service Commission, member of former NRC advisory committee (regarding decommissioning of power plants); Marc Merlin, nuclear physicist formerly with RAND Corporation, Atlanta, Georgia; Robert Pollard, engineer formerly with Nuclear Regulatory Commission, Union of Concerned Scientists, Washington, D.C.

With the exception of Mr. Lawless, who will testify on those portions of groundwater relating to the Savannah River Plant, Intervenor's have not yet selected its witnesses.

Interrogatory 3: With respect to Contention 7, which asserts that Applicants have not adequately addressed the value of the groundwater below the Plant Vogtle site and fails [sic] to provide adequate assurance that the groundwater will not be contaminated, please state a) the basis for your belief that an accidental spill of radioactive water on the Vogtle site could result in radioactive contamination of either the shallow or deeper aquifers under Plant Vogtle; b) the basis for your belief that the Tuscaloosa aquifer may not be isolated from the surface to the Plant Vogtle site; and c) the basis for your belief that any or all deep aquifers are hydraulically connected anywhere in the vicinity of the plant.

RESPONSE: a) and b) There has been clearly documented contamination of the Tuscaloosa Aquifer below the Savannah River Plant (SRP), which has a very similar

hydrogeology to the Plant Vogtle site (for details, please see CPG/GANE's Response to Applicants' First Set of Interrogatories and Request for Production of Documents"). This is true despite claims by SRP personnel that the Tuscaloosa aquifer could not be contaminated by spills at SRP. c) There is really no such thing as an "isolated" aquifer, as demonstrated at SRP and elsewhere.

Interrogatory 4: Subcontention 10.1 (Integrated Dose v. Dose Rate) alleges that Applicants' testing methods are inadequate because the Applicants only use high levels of radiation or integrated dose. In support of this subcontention you cite research performed at Sandia Laboratory for the proposition that many materials, including polymers found in cable insulation and jackets, seals, rings and gaskets, may experience greater damage from lower dose rates. State whether the research performed at Sandia forms the sole basis for subcontention 10.1. If not, please state the full and complete basis for the assertions made in the subcontention in question.

RESPONSE: At present, the Sandia research and references cited therein form the basis for Intervenors' contention.

Interrogatory 5: Subcontention 10.3 (Cable in Multiconductor Configurations) cites a Sandia study (not identified) for the proposition that in tests of EPR cable material, multiconductor configurations performed "substantially worse than single conductor configurations and that qualification testing implying only single conductors may not be representative of multiconductor performance." You further allege that the results of this report have not been considered in Applicants' testing program.

a. State the full name of the report, the author, the report number and publication date of the Sandia study cited in support of subcontention 10.3.

RESPONSE: "An Overview of Equipment Survivability Studies at Sandia National Laboratories," Proceeding, International Meeting on Light Water Reactor Severe



Accident Evaluation, August 28-September 1, 1983.

b. Is the study identified in response to interrogatory 5a the sole basis for subcontention 10.3? If not, please state the additional bases which you allege support the subcontention.

RESPONSE: At present, the Sandia study and the references cited therein are the basis for subcontention 10.3.

c. State the full bases for your assertion that the results of the Sandia report must be considered in Applicants' testing program.

RESPONSE: The concept of environmental qualification is fundamental to NRC regulation of nuclear power reactors. For Intervenors' full bases, please see the bases for CPG-10, pp. 21-26, "Supplement to Petition for Leave to Intervene and Request for Hearing," Campaign for a Prosperous Georgia, April 11, 1984.

Interrogatory 6: Subcontention 10.5, which challenges the qualification of solenoid valves used at Vogtle, is based on test results performed by ASCO and Franklin Research Center and upon an NRC Board Notification Issuance. Are the test results and Board Notification issuance the sole bases in support of subcontention 10.5? If not, please state the full and complete bases for the allegations contained in the subcontention. In addition, state the full name or title of the test results, the authors, test or report number and date of issuance of the test results in question. If available to you, attach copies of any such test results.

RESPONSE: At present, the contention is based on the test results performed by ASCO and Franklin Research Center and upon an NRC Board Notification issuance.

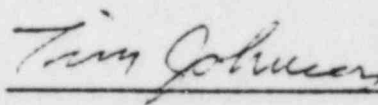
Interrogatory 7: State in detail the showing CPG and GANE believe the Applicants must make to demonstrate, as set out in Contention 11, their basis for confidence that no unacceptable radiation releases will occur as a result of steam generator tube failures occasioned by vibration-induced fatigue cracking and by bubble collapse within the Vogtle steam generators.

RESPONSE: The Applicants must demonstrate that they have adequately addressed the

problems at other plants and that they have corrected these problems. These corrections must be based on empirical demonstrations that they do indeed resolve the problems.

The above responses were prepared in their entirety by Tim Johnson based on his personal knowledge and on CPG/GANE's Response to Applicants' First Set of Interrogatories and Request for Production of Documents, December 5, 1984.

Respectfully submitted this, the 10th day of December, 1984,



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for Intervenors  
Campaign for a Prosperous Georgia and  
Georgians Against Nuclear Energy

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER CO., et al.

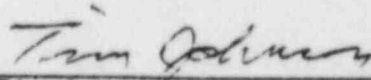
(Vogtle Electric Generating Plant,  
Units 1 and 2)

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Docket Nos. 50-424 and 50-425

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing CPG/GANE's Response to NRC Staff's Interrogatories were served by deposit with the U. S. Postal Service in the City of Atlanta for first class delivery to those listed on the attached Service List this 10th day of December, 1984.



Tim Johnson  
Executive Director  
Campaign for a Prosperous Georgia  
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Campaign for a Prosperous Georgia and  
Georgians Against Nuclear Energy

UNITED STATES OF AMERICA  
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(Vogtle Electric Generating Plant,  
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Docket Nos. 50-424 and 50-425

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