

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
POWER AUTHORITY OF THE STATE OF)
NEW YORK) Docket No. 50-549
(Greene County Nuclear Power Plant))

NRC STAFF INTERROGATORIES TO
COLUMBIA COUNTY

Pursuant to 10 CFR § 2.740 of the Commission's Rules of Practice, the NRC Staff hereby requests that Columbia County (Intervenor) answer separately and fully in writing under oath or affirmation the interrogatories set forth below.

Insofar as any answer is based on information other than the personal knowledge of the individual subscribing to the answers, the source of such information shall be disclosed. When the source of the information is another individual, such disclosure is to be in the form of the individual's name, address, and relationship with the Intervenor, if any. Where the source of information is a writing of some kind, it shall be identified.

The interrogatories set forth below are to be considered the Intervenor's continuing obligation. Accordingly, if, after the Intervenor has answered these interrogatories, additional information comes to its attention with respect to one or more of the answers, the answers should be amended to provide such additional information.

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Columbia County Stipulated Contention 6.^{*/}

6. The Petitioner contends that there has been an insufficient evaluation of the effects of quarrying and placement of large amounts of earth on the stability of subterranean geologic formations.

1-1 a. Upon what person or persons do you rely to substantiate your case on the above contention?

b. Provide the addresses and educational and professional qualifications of any person named in your response to a. above.

c. Identify which of the above persons you intend to call as witnesses on this contention in this proceeding.

d. Identify which of those persons identified in c. above you anticipate will appear voluntarily and which under subpoena.

e. Identify each document upon which this contention is based.

1-2 Indicate all the deficiencies (noting for each deficiency the basis for your belief that such a deficiency exists) in the NRC Staff's evaluation of the stability of subterranean geologic formations in light of the referenced "quarrying " and "placement of large amounts of earth" near the Cementon site.

1-3 Indicate (with bases) how the specific deficiencies noted in your response to 1-2, above, could impact the Staff's conclusion regarding the stability of the Cementon site.

^{*/} The wording of this contention conforms to the wording accepted by the Atomic Safety and Licensing Board in its Memorandum and Order dated February 14, 1977, at 54.

- 1-4 Indicate all bases, calculations, and references (including trench logs, maps, well data and published works) that you intend to rely on during this proceeding to support your contention that there has been an insufficient evaluation of the effects of quarrying and placement of large amounts of earth on the stability of subterranean geologic formations at the Cementon site.

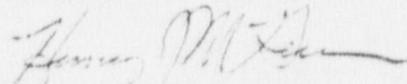
- 1-5 Identify the quantity, type and location of the "large amounts of earth" referred to in your contention.

- 1-6 State the bases, calculations, and references that support the contention that the "large amounts of earth" described in your response to 1-5, above, may have a deleterious effect on the seismic or geologic condition at the Cementon site.

- 1-7 To the extent that Intervenor's case on this contention will rely on cross-examination of witnesses presented by other parties to this proceeding, identify any material to be relied upon during such cross-examination.

- 1-8 Identify all documentary or other material which you intend to offer as exhibits on this contention in this proceeding.

Respectfully submitted,



Henry J. McGurren
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 2nd day of October, 1978