

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

(Greene County Nuclear Power Plant)

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}
}
} Docket No. 50-549

NRC STAFF INTERROGATORIES
TO GREENE COUNTY ET AL.

Pursuant to 10 CFR §2.740 of the Commission's Rules of Practice, the NRC Staff hereby requests that Greene County et al. (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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Greene County, Town of Catskill, Village of Catskill, Town of Athens
and Village of Athens Unstipulated Contention I-C*

The impact or possible consequences of blasting in the vicinity of the Cementon site has not been adequately evaluated in the PSAR and the Power Authority of the State of New York's purported description of the geology of the Cementon site is not, in fact, a description of this site but relates to an area located approximately fifteen miles away.

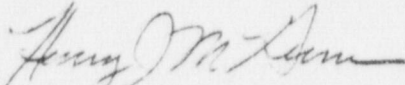
- 1-1 a. Upon what person or persons do you rely to substantiate your case on the above contention?
- b. Provide the addresses and educational and professional qualifications of any person named in your response to a. above.
- c. Identify which of the above persons you intend to call as witnesses on 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 the deficiencies in the Staff's evaluation of the effects on the proposed facility from blasting operations conducted close to the site by local industries. Indicate any data, sources of data, assumptions, reasons for the assumptions used in performing any calculations.**

*/ 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 32 and 33.

**/ We desire this information in sufficient detail to allow replication of the results of your calculations.

- 1-3 Indicate with bases how the specific deficiencies noted in your response to 1-2, above, could impact the Staff's conclusions regarding the stability of the Cementon site.
- 1-4 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.
- 1-5 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