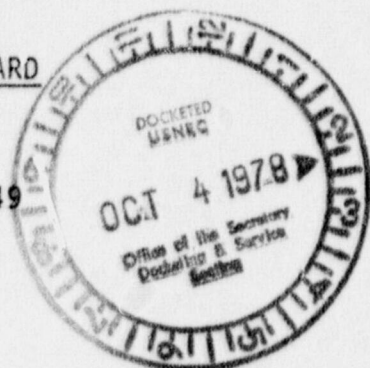


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
POWER AUTHORITY OF THE STATE OF
NEW YORK
(Greene County Nuclear Power Plant)

Docket No. 50-549



CERTIFICATE OF SERVICE

I hereby certify that copies of:

- (1) "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, SHIRLEY A. BRAND AND MID-HUDSON NUCLEAR OPPONENTS";
- (2) "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, CEMENTON CIVIC ASSOCIATION";
- (3) "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, CITIZENS TO PRESERVE HUDSON VALLEY";
- (4) "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, COLUMBIA COUNTY";
- (5) "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, GREENE COUNTY ET AL.";
- (6) "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, LEHIGH PORTLAND CEMENT COMPANY";
- (7) "NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, ARTHUR L. REUTER AND THE COLUMBIA COUNTY SURVIVAL COMMITTEE"; and
- (8) "NOTICE OF APPEARANCE" for Jane A. Axelrad

in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 2nd day of October, 1978:

Andrew C. Goodhope, Esq., Chairman*
Atomic Safety and Licensing Board
3320 Estelle Terrace
Wheaton, Maryland 20906

Dr. George A. Ferguson
Professor of Nuclear Engineering
Howard University
Washington, D. C. 20001

Dr. Richard F. Cole*
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Ms. Rosemary S. Pooler
Executive Director
New York State Consumer
Protection Board
99 Washington Avenue
Albany, New York 12210

Lewis R. Bennett, Esq.
Assistant General Manager -
General Counsel
Power Authority of the State
of New York
10 Columbus Circle
New York, New York 10010

George J. Pulver, Jr., Esq.
Bagley, Chadderdon, Pulver
& Stiefel
302 Main Street
P. O. Box 486
Catskill, New York 12414

Citizens to Preserve the Hudson
Valley
c/o Robert J. Kafin, Esq.
115 Maple Street
Glens Fall, New York 12801

Michael Curley, Esq.
Deputy Commissioner and Counsel
New York State Atomic Energy
Council
99 Washington Avenue
Albany, New York 12245

Douglas Lutzy, Esq.
Dr. Sury Putta
Michael Flynn, Esq.
Nancy Spiegel, Esq.
Staff Counsel
State of New York
Public Service Commission
Empire State Plaza
Albany, New York 12223

Village of Catskill
c/o Daniel K. Lalor, Esq.
Meadow, Ruf and Lalor, P.C.
8 Reed Street
Coxsackie, New York 12051

Algird F. White, Jr., Esq.
DeGraff, Foy, Conway and
Holt-Harris
90 State Street
Albany, New York 12207

William J. Spampinato, Esq.
Rosenberg & Spampinato
443 Warren Street
Hudson, New York 12534

Anthony Scott, Mayor
Village of Athens
93 N. Washington Street
Athens, New York 12105

Mr. John Nickolitch
Cementon Civic Association
70 Short Street
Cementon, New York 12415

Vito J. Cassan, Esq.
Assistant General Counsel
Power Authority of the State
of New York
10 Columbus Circle
New York, New York

Edward G. Cloke, Esq.
Steenbergh & Cloke
28 Second Street
Athens, New York 12015

Jeffrey Cohen, Esq.
New York State Energy Office
Swan Street Building
Core 1, Second Floor
Albany, New York 12223

Daniel Riesel, Esq.
Winer, Neuburger & Sive
425 Park Avenue
New York, New York 10022

Mr. John Lenny
Public Information Officer
Power Authority of the State
of New York
Catskill Motor Lodge
Catskill, New York

Albert K. Butzel, Esq.
Butzel and Kass
45 Rockefeller Plaza
Suite 2350
New York, New York 10020

Honorable Edward D. Cohen
Presiding Examiner
Public Service Commission
Empire State Plaza
Agency Building
Albany, New York 12223

Edward R. Patrick, Esq.
Assistant Counsel for Energy
Carl G. Dworkin, Esq.
New York State Department of
Environmental Conservation
50 Wolf Road
Albany, New York 12233

Honorable Donald Carson
Associate Hearing Examiner
Department of Environmental
Conservation
50 Wolf Road
Albany, New York 12233

Arthur L. Reuter, Esq.
Attorney at Law
Sharpe's Landing
Germantown, New York 12526

Mr. Peter D. G. Brown
Chairman
Mid-Hudson Nuclear Opponents
P.O. Box 666
New Paltz, New York 12561

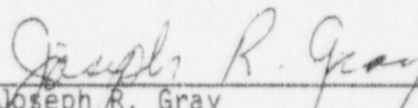
Atomic Safety and Licensing Board
Panel*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Atomic Safety and Licensing Appeal
Panel (5)*
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Section (3)
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Town of Athens
c/o Alan Francis Ruf, Esq.
Meadow, Ruf and Lalor, P.C.
8 Reed Street
Coxsackie, New York 12051

Columbia County Survival
Committee
c/o Robert J. Kafin, Esq.
115 Maple Street
Glens Falls, N.Y. 12801



Joseph R. Gray
Counsel for NRC Staff

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, AND REQUEST FOR THE
PRODUCTION OF DOCUMENTS FROM, SHIRLEY A. BRAND
AND MID-HUDSON NUCLEAR OPPONENTS

The Nuclear Regulatory Commission (NRC) Staff hereby requests that Shirley A. Brand and Mid-Hudson Nuclear Opponents (Intervenor), pursuant to 10 CFR § 2.740b, answer separately and fully, in writing under oath or affirmation, the following interrogatories within 14 days after service hereof in accordance with the Atomic Safety and Licensing Board's Order of August 1, 1978.

For each response to the interrogatories listed below, identify the person or persons who prepared, or substantially contributed to the preparation of the response, the address of the individual and the individual's relationship with the Intervenor, if any.

The interrogatories attached 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 in a timely manner to provide such additional information.

The NRC Staff further requests that the Intervenor, pursuant to 10 CFR § 2.741, provide copies of, or make available for Staff inspection and copying, the documents designated by the Intervenor in response to certain of the accompanying interrogatories.

A. General Interrogatories^{1/}

G-1 State whether or not you intend to call any person or persons as witnesses in the NRC proceeding in support of

- (a) Contention 1(a)
- (b) Contention 1(b)
- (c) Contention 1(c)
- (d) Contention 3(d)

and provide the names, addresses, educational backgrounds and professional qualifications of those persons you intend to call.

G-2 Indicate whether those persons identified in response to interrogatory G-1 in support of

- (a) Contention 1(a)
- (b) Contention 1(b)
- (c) Contention 1(c)
- (d) Contention 3(d)

will appear voluntarily or under subpoena.

G-3 Provide summaries of the views, positions or proposed testimony on

- (a) Contention 1(a)
- (b) Contention 1(b)
- (c) Contention 1(c)
- (d) Contention 3(d)

of all persons named in response to interrogatory G-1 that you intend to present during this proceeding.

^{1/} Interrogatories in this section should be answered with respect to each contention specified in the interrogatories. The designation of contentions corresponds to that set forth in the Atomic Safety and Licensing Board's Memorandum and Order of February 14, 1977.

G-4 Identify by author, title, date of publication and publisher, all books, documents and papers that you intend to employ or rely upon in presenting your direct case on

- (a) Contention 1(a)
- (b) Contention 1(b)
- (c) Contention 1(c)
- (d) Contention 3(d)

and provide copies of, or make available for Staff inspection and copying, these items.

G-5 If the representations made in

- (a) Contention 1(a)
- (b) Contention 1(b)
- (c) Contention 1(c)
- (d) Contention 3(d)

are based in whole or in part on any documents prepared by the Applicant or the NRC Staff which you contend are deficient, specify which document, and the particular portions thereof, you regard as deficient, and explain specifically and in detail why they are deficient, citing any documents, studies or reports which form the bases for your assertions.

G-6 Identify by author, title, date of publication and publisher, all books, documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with

- (a) Contention 1(a)
- (b) Contention 1(b)

- (c) Contention 1(c)
- (d) Contention 3(d).

B. Interrogatories Related to Contention 1 - Emergency Procedures

- 1-1 Specifically define what is meant by "sufficient information to satisfy the Commission's construction permit requirements regarding measures to be taken in the event of an emergency at the proposed facility" with regard to
- (a) notification of the general public.
 - (b) adequacy of highways and public transportation within the vicinity of the plant site.
 - (c) adequacy of medical facilities for emergency treatment.
- 1-2 State whether you have any information to support an assertion that it would not be possible prior to issuance of an operating license to develop
- (a) adequate highways and public transportation within the vicinity of the plant site to effect evacuation of persons within the LPZ.
 - (b) adequate medical facilities for emergency treatment.
- 1(b)-1 Are you asserting that the highways and public transportation within the vicinity of the plant are now inadequate to effect the evacuation of persons within the LPZ of the proposed facility? If the answer to the above question is yes, state specifically the basis for that assertion and identify any documents, studies or reports upon which you rely as the basis for this assertion.

1(c)-1 Are you asserting that the medical facilities in the vicinity of the plant are now inadequate to provide emergency treatment in the event of an emergency at the proposed facility? If the answer to the above question is yes, state specifically the basis for that assertion and identify any documents, studies or reports upon which you rely as the basis for this assertion.

C. Interrogatories Related to Contention 3(d) - Radiological Releases

3(d)-1 Describe qualitatively and quantitatively the "radiological ... discharges from the proposed facility" which are referred to in Contention 3(d) and identify any reports, studies or papers on which you rely for the description provided.

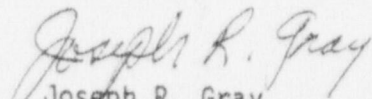
3(d)-2 Identify the specific sources within the proposed facility of the radiological discharges referred to in Contention 3(d) and state specifically the basis for the assertion that such discharges will occur.

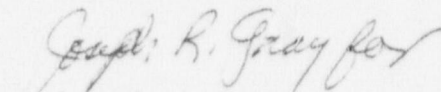
3(d)-3 State specifically the basis for the assertion in Contention 3(d) that the radiological discharges described in response to interrogatory 3(d)-1 will have adverse effects on the ecology and the biological communities of the Hudson River and identify any reports, studies or papers on which you rely to support this assertion.

3(d)-4 Contention 3(d) asserts that the Applicant has inadequately assessed the adverse effects of radiological discharges from the proposed

facility. Identify the Applicant's assessment referred to in this Contention, describe the particular inadequacies asserted to exist, and state specifically the basis for your assertion that these particular aspects of the Applicant's assessment are inadequate.

Respectfully submitted,


Joseph R. Gray
Counsel for NRC Staff


Jane A. Axelrad
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 29th day of September, 1978