

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) Stipulated Contention I.A | (g) Stipulated Contention I.B.5 |
| (b) Unstipulated Contention I.A | (h) Stipulated Contention I.B.6 |
| (c) Stipulated Contention I.B.1 | (i) Stipulated Contention I.C.1 |
| (d) Stipulated Contention I.B.2 | (j) Stipulated Contention I.C.2 |
| (e) Stipulated Contention I.B.3 | (k) Stipulated Contention I.C.3 |
| (f) Stipulated Contention I.B.4 | |

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) Stipulated Contention I.A | (g) Stipulated Contention I.B.5 |
| (b) Unstipulated Contention I.A. | (h) Stipulated Contention I.B.6 |
| (c) Stipulated Contention I.B.1 | (i) Stipulated Contention I.C.1 |
| (d) Stipulated Contention I.B.2 | (j) Stipulated Contention I.C.2 |
| (e) Stipulated Contention I.B.3 | (k) Stipulated Contention I.C.3 |
| (f) Stipulated Contention I.B.4 | |

will appear voluntarily or under subpoena.

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

- | | |
|---------------------------------|---------------------------------|
| (a) Stipulated Contention I.A | (g) Stipulated Contention I.B.5 |
| (b) Unstipulated Contention I.A | (h) Stipulated Contention I.B.6 |
| (c) Stipulated Contention I.B.1 | (i) Stipulated Contention I.C.1 |
| (d) Stipulated Contention I.B.2 | (j) Stipulated Contention I.C.2 |
| (e) Stipulated Contention I.B.3 | (k) Stipulated Contention I.C.3 |
| (f) Stipulated Contention I.B.4 | |

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 and the Memorandum and Order of September 7, 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) Stipulated Contention I.A | (g) Stipulated Contention I.B.5 |
| (b) Unstipulated Contention I.A | (h) Stipulated Contention I.B.6 |
| (c) Stipulated Contention I.B.1 | (i) Stipulated Contention I.C.1 |
| (d) Stipulated Contention I.B.2 | (j) Stipulated Contention I.C.2 |
| (e) Stipulated Contention I.B.3 | (k) Stipulated Contention I.C.3 |
| (f) Stipulated Contention I.B.4 | |

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

G-5 If the representations made in

- | | |
|---------------------------------|---------------------------------|
| (a) Stipulated Contention I.A | (g) Stipulated Contention I.B.5 |
| (b) Unstipulated Contention I.A | (h) Stipulated Contention I.B.6 |
| (c) Stipulated Contention I.B.1 | (i) Stipulated Contention I.C.1 |
| (d) Stipulated Contention I.B.2 | (j) Stipulated Contention I.C.2 |
| (e) Stipulated Contention I.B.3 | (k) Stipulated Contention I.C.3 |
| (f) Stipulated Contention I.B.4 | |

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 documents, 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 basis 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) Stipulated Contention I.A | (g) Stipulated Contention I.B.5 |
| (b) Unstipulated Contention I.A | (h) Stipulated Contention I.B.6 |
| (c) Stipulated Contention I.B.1 | (i) Stipulated Contention I.C.1 |
| (d) Stipulated Contention I.B.2 | (j) Stipulated Contention I.C.2 |
| (e) Stipulated Contention I.B.3 | (k) Stipulated Contention I.C.3. |
| (f) Stipulated Contention I.B.4 | |

B. Interrogatories Related to Stipulated Contention I.A -
Exclusion Area

- SI.A.-1 State what constitutes "sufficient information" to insure that Applicant can control all land within the exclusion area as required by 10 CFR Part 100.
- SI.A.-2 State when Applicant requested that the size of the exclusion area be reduced.
- SI.A.-3 State whether it is your assertion that it would be improper for the Applicant to change its plant design to conform to the requirements of 10 CFR Part 100.
- SI.A.-4 Specifically define what is meant by the phrase "unapproved meteorological models" as that phrase is used in Contention I.A.
- SI.A.-5 State whether, if Applicant now owned all land within the proposed exclusion area, the exclusion area would meet the requirements of 10 CFR Part 100.

C. Interrogatories Related to Unstipulated Contention I.A -
Generic Safety Concerns

- UI.A-1 For each generic safety problem listed in Unstipulated Contention I.A, state specifically the basis for the assertion that such generic safety problem is "particularly relevant to the proposed Greene County facility" and identify any reports, studies or papers on which you rely to support your answers.

- UI.A-2 Do you contend, in Unstipulated Contention I.A, that the generic safety problems referred to therein cannot be resolved in a manner sufficient to allow the issuance of a construction permit for the proposed Greene County facility?
- UI.A-3 If the answer to interrogatory UI.A-2 is "yes"; state specifically the basis for your assertion with regard to each generic safety problem and identify any reports, studies or papers on which you rely to as the basis for your assertion.

D. Interrogatories Related to Stipulated Contentions I.B.1 through I.B.6 - Specific Safety Issues

Contention I.B.1

- SI.B.1-1 Specifically identify the PSAR deficiencies which you assert exist with regard to the plant design related to external flooding phenomena.
- SI.B.1-2 State specifically the bases for your assertion that the matters identified in response to interrogatory SI.B.1-1 preclude a finding that the public health and safety will not be endangered and identify any reports, studies or papers on which you rely to support your assertions.

Contention I.B.2

- SI.B.2-1 Specifically identify the PSAR deficiencies which you assert exist with regard to the adequacy of missile protection design to meet Commission criteria and identify the particular Commission criteria referred to in Stipulated Contention I.B.2.
- SI.B.2-2 State specifically the bases for your assertion that the deficiencies identified in response to interrogatory SI.B.2-1 preclude a finding that the public health and safety will not be endangered and identify any reports, studies or papers on which you rely to support your assertions.

SI.B.2-3 Identify missiles, other than reactor coolant pump fly-wheel missiles explicitly referred to in Stipulated Contention I.B.2, as to which it is claimed that missile protection design is inadequate.

Contention I.B.3

SI.B.3-1 Specifically identify the PSAR deficiencies which you assert exist with regard to the adequacy of containment piping system isolation valves to ensure that accidental releases will not exceed 10 CFR Part 100 guidelines.

SI.B.3-2 State specifically the bases for your assertion that the deficiencies identified in response to interrogatory SI.B.3-1 preclude a finding that the public health and safety will not be endangered and identify any reports, studies or papers on which you rely to support your assertions.

SI.B.3-3 Identify the specific accident or accidents referred to in Stipulated Contention I.B.3.

Contention I.B.4

SI.B.4-1 Specifically identify the valves designed to mitigate accident consequences which you assert may become submerged during Emergency Core Cooling System operation.

SI.B.4-2 State specifically the basis for your assertion that the valves identified in response to interrogatory SI.B.4-1 may become submerged during Emergency Core Cooling System operation and identify any reports, studies or papers on which you rely to support your assertions.

SI.B.4-3 Specifically identify the PSAR deficiencies which you assert exist with regard to the submergence of valves during Emergency Core Cooling System operation.

SI.B.4-4 State specifically the bases for your assertion that the deficiencies identified in response to interrogatory SI.B.4-3 preclude a finding that the public health and safety will not be endangered and identify any reports, studies or papers on which you rely to support your assertions.

Contention I.B.5

SI.B.5-1 Identify the specific "redundant safety systems," including electrical systems and any others, referred to in Stipulated Contention I.B.5.

SI.B.5-2 Describe the physical separation proposed by the Applicant for the redundant safety systems identified in your response to interrogatory SI.B.5-1, and for each safety system thus described, state the basis for your assertion that such separation is insufficient to ensure that the "single failure criterion" will be met. In addition, identify any reports, studies or papers on which you rely in support of your assertions with regard to the adequacy of physical separation.

SI.B.5-3 Specifically identify the accidents or occurrences which, because of the asserted inadequacies in physical separation, could result in the redundant safety systems' failure to meet the single failure criterion.

Contention I.B.6

SI.B.6-1 Identify the specific equipment containing radio-cobalt build-up to which you refer in Stipulated Contention I.B.6 and describe the location of such equipment or the areas within such equipment where you contend radio-cobalt buildup will occur.

SI.B.6-2 Specifically identify the PSAR deficiencies which you assert exist with regard to the ability or adequacy of plans to assure

that radio-cobalt buildup will not cause 10 CFR Part 20 occupational exposure limits to be exceeded.

SI.B.6-3 State specifically the bases for your assertions that the deficiencies identified in response to interrogatory SI.B.6-2 may make it impossible to meet the 10 CFR Part 20 occupational exposure criteria, and identify any reports, studies or papers on which you rely for your assertions.

E. Interrogatories Related to Stipulated Contentions I.C.1, I.C.2 and I.C.3 - Financial Qualifications

Contention I.C.1

SI.C.1-1 Specifically define what is meant by the phrase "long-term capital markets" as that phrase is used in Stipulated Contention I.C.1.

SI.C.1-2 State specifically the bases for the assertion in Stipulated Contention I.C.1 that "the long-term capital markets appear to be closed or extremely limited to borrowings by the State of New York" and identify any documents, studies or reports upon which you rely as the basis for this assertion.

SI.C.1-3 State specifically the bases for the assertion implied in Stipulated Contention I.C.1 that the long-term capital markets are closed or extremely limited with regard to borrowings by the Applicant itself and identify any documents, studies or reports upon which you rely as the basis for this assertion.

Stipulated Contention I.C.2

SI.C.2-1 State specifically the bases for the assertion in Stipulated Contention I.C.2 that there will be no demand for electricity generated by the proposed facility and identify any documents, studies or reports upon which you rely as the basis for this assertion.

SI.C.2-2 What is meant by the "necessary revenue" referred to in Stipulated Contention I.C.2?

Stipulated Contention I.C.3

SI.C.3-1 Define the specific

- (a) "increased cost of nuclear fuel"
- (b) "high capital cost of nuclear facilities" and
- (c) "crushing economic burden of excess reserves"

referred to in Contention I.C.3 and state specifically the basis for your assertion that the costs thus identified will make electricity generated by the Greene County facility non-competitive thereby affecting the Applicant's financial qualifications to engage in the proposed activities in accordance with the Commission's regulations.

SI.C.3-2 What is your understanding of the meaning of the phrase "financially qualified to engage in the proposed activities in accordance with the regulations" as that phrase is used in 10 CFR § 50.40 with regard to the construction permit stage of the licensing process for nuclear plants?

Respectfully submitted,

Joseph R. Gray

Joseph R. Gray
Counsel for NRC Staff

Joseph R. Gray for

Jane A. Axelrad
Counsel for NRC Staff

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