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NRC PUBLIC DOCUMENT ROOM

October 27, 1978



Vicki Harding, Esq.
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Greene County Nuclear Power Plant Section

Re: NRC Docket No. 50-549

Dear Ms. Harding:

Enclosed herewith are our responses to interrogatories M1 through M4, L1 through L11, and O1 through O11 propounded by the Nuclear Regulatory Commission Staff to Lehigh Portland Cement Company. I have not enclosed responses to interrogatories H1 through H11 as I have not yet received those documents from Heidelberg, Germany.

Very truly yours,

DeGRAFF, FOY, CONWAY & HOLT-HARRIS

Algird F. White, Jr.
Algird F. White, Jr.

AFW:kar
Enclosures
cc: All parties
w/enclosure

7811/6 & 48

GREENE COUNTY NUCLEAR POWER PLANT

APPLICATION TO THE NEW YORK STATE BOARD
ON ELECTRIC GENERATION SITING AND THE ENVIRONMENT
FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY

INTERROGATORY NO. M1

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

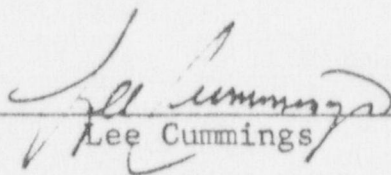
DATED: September 22, 1978

INTERROGATORY:

What is Lehigh's approximate share of the Northeast cement market for each of the last three years?

RESPONSE:

Lehigh's approximate share of the Northeast cement market for each of the last three years is 15%.



Lee Cummings

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INTERROGATORY NO. M2

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

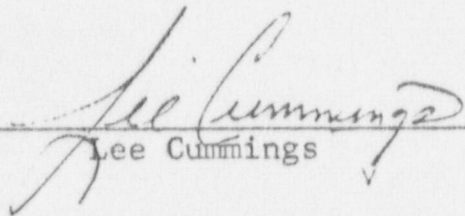
DATED: September 22, 1978

INTERROGATORY:

What percentage of Lehigh's national cement sales does its Northeast sales comprise for each of the last three years?

RESPONSE:

The percentage of Lehigh's national cement sales which are Northeast region sales is approximately 12%.



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INTERROGATORY NO. M3

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

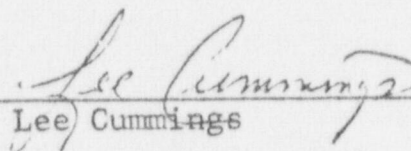
DATED: September 22, 1978

INTERROGATORY:

What percentage of Lehigh's national cement earnings does its Northeast earnings comprise for each of the past three years?

RESPONSE:

Lehigh's Northeast region did not contribute significantly to Lehigh's national cement earnings in the past three years.



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INTERROGATORY NO. M4

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

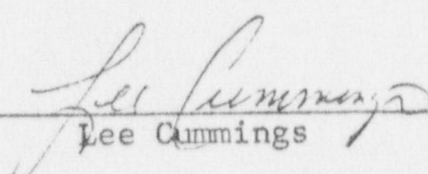
DATED: September 22, 1978

INTERROGATORY:

What relationship does Lehigh's Northeast market performance have to Lehigh's overall market viability?

RESPONSE:

Lehigh's Northeast market performance has an important relationship to Lehigh's overall market viability because it is Lehigh's goal to remain a national cement producer having no less than 5 operating cement plants located throughout the United States.



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INTERROGATORY NO. L1

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

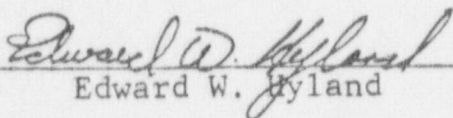
DATED: September 22, 1978

INTERROGATORY:

Has the Lehigh board of directors given any consideration either in formal or informal proceedings to the loss of its facilities at Cementon as a result of the construction of the Greene County Nuclear Plant (GCNP) at the Cementon site?

RESPONSE:

The Lehigh Board of Directors has given extensive consideration to the loss of its facilities at Cementon as a result of the construction of the Greene County Nuclear Plant at the Cementon site.



Edward W. Hyland

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INTERROGATORY NO. L2

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

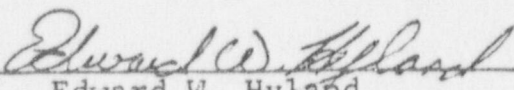
DATED: September 22, 1978

INTERROGATORY:

In the event that the GCNP is built on Lehigh property at Cementon, has the Lehigh board of directors determined either formally or informally that its production facilities at Cementon must be closed permanently?

RESPONSE:

The Lehigh Board of Directors has not formally determined that in the event that the GCNP is built on Lehigh property at Cementon that its production facilities at Cementon must be closed permanently. The subject of the intrusion of the GCNP on operations of the Lehigh plant at Cementon has been extensively discussed and the Lehigh Board is convinced that the disruptions caused by the construction of the GCNP at Cementon will be such that they significantly impact the Lehigh production facility and will probably cause its premature closing. Moreover, the construction of the GCNP on Lehigh property at Cementon will deprive Lehigh of its site for a new low cost production facility which will be necessary in the foreseeable future.



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INTERROGATORY NO. L3

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

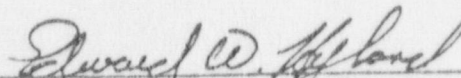
DATED: September 22, 1978

INTERROGATORY:

In the event that the GCNP is built on the Lehigh property, and that such a development causes the closing of the facility, has the Lehigh board of directors given consideration either formally or informally to what alternatives the company should take in response to this closing of its facilities?

RESPONSE:

The Lehigh Board of Directors has given extensive informal consideration to what alternatives the company should take if the GCNP is built on Lehigh property in Cementon.



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INTERROGATORY NO. L4

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

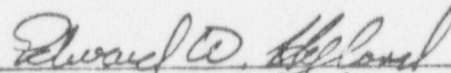
DATED: September 22, 1978

INTERROGATORY:

In the event of such a loss of the Cementon facilities, has the Lehigh board of directors either formally or informally determined that it is not feasible to construct an entirely new facility at a virgin or "greenfield" site?

RESPONSE:

The Lehigh Board of Directors has informally determined that it is not feasible to construct an entirely new facility at a virgin or "greenfield" site located within the Northeast region.



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INTERROGATORY NO. L5

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

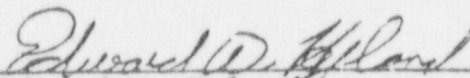
DATED: September 22, 1978

INTERROGATORY:

Has the Lehigh board of directors initiated or caused to be initiated in any way a search for a virgin or "greenfield" site? If so, in what governmental jurisdiction is the site located?

RESPONSE:

The Lehigh Board of Directors has not initiated or caused to be initiated a search for a virgin or "greenfield" site within the Northeast region. Lehigh is considering a "greenfield" plant in another area of the United States. The construction of a new cement plant on this "greenfield" site is not dependent upon any contingencies affecting Lehigh's Cementon facilities. Lehigh has initiated the preparation of an environmental impact study preparatory to the construction of a new cement production facility located on land owned by Lehigh immediately adjacent to the Hudson River at Cementon.


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INTERROGATORY NO. L6

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

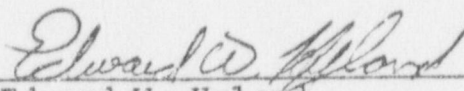
DATED: September 22, 1978

INTERROGATORY:

In the event of a loss of the Cementon facilities, has the Lehigh board of directors either formally or informally discussed the feasibility of purchasing the existing (operating or non-operating) facilities of another cement manufacturer?

RESPONSE:

The Lehigh Board of Directors has not discussed the feasibility of purchasing the existing facilities of another cement manufacturer in the Northeast.



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INTERROGATORY NO. L7

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

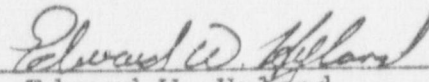
DATED: September 22, 1978

INTERROGATORY:

If such discussions have occurred, what candidates for such purchase have been identified, and where are they located?

RESPONSE:

Not applicable. See answer to L6.



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INTERROGATORY NO. L8

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

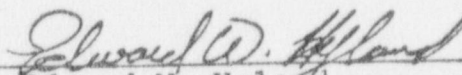
DATED: September 22, 1978

INTERROGATORY:

In the event of a loss of the Cementon facilities, has the Lehigh board of directors either formally or informally discussed the feasibility of purchasing the adjoining properties of the Alpha and/or Marquette companies?

RESPONSE:

The Lehigh Board of Directors has not discussed the feasibility of purchasing the adjoining properties of the Alpha and/or Marquette companies.



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INTERROGATORY NO. L9

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

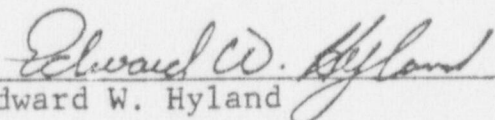
DATED: September 22, 1978

INTERROGATORY:

In the event of such discussions, has the Lehigh board initiated or caused to be initiated any analysis of the feasibility of a purchase of either the adjoining Alpha or Marquette properties?

RESPONSE:

Not applicable. See answer to L8.



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INTERROGATORY NO. L10

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

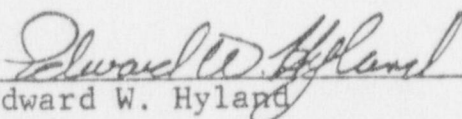
DATED: September 22, 1978

INTERROGATORY:

Has the Lehigh board of directors initiated or caused to be initiated any direct or indirect, formal or informal contacts with Alpha or Marquette officials regarding a potential Lehigh purchase of either of the companies adjoining properties?

RESPONSE:

Not applicable. See answer to L8.



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INTERROGATORY NO. L11

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

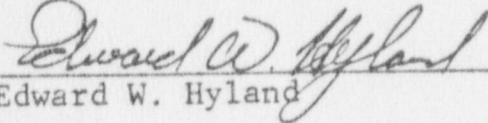
DATED: September 22, 1978

INTERROGATORY:

In the event of the above described loss of Lehigh's production facilities at Cementon, has the Lehigh board of directors formally or informally determined that a purchase of the adjoining properties of Alpha and/or Marquette is not feasible? On what basis was such infeasibility established for each company's property?

RESPONSE:

The Lehigh Board of Directors made no determination with respect to the purchase of the adjoining properties of Alpha and/or Marquette.



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GREENE COUNTY NUCLEAR POWER PLANT

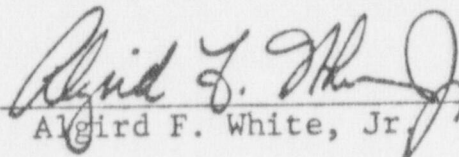
APPLICATION TO THE NEW YORK STATE BOARD
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INTERROGATORY NO. 01 - 011 (Part IV)

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

DATED: September 22, 1978

Interrogatories Part IV, 01 through 011, are too vague to answer. The term "working group" is not a definitive term used within the Lehigh organization with the exception of references to the Executive Group. Executive Group discussions of the matters inquired into in Interrogatories 01 through 011 are covered in responses to interrogatories L1 through L11.


Algird F. White, Jr.