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RELATED CORRESPONDENCE

August 1, 1988 DOCKETED  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of	)	
	)	
PUBLIC SERVICE COMPANY OF	)	Docket Nos. 50-443-OL-1
NEW HAMPSHIRE, et al.	)	50-444-OL-1
	)	On-site Emergency
(Seabrook Station, Units 1 and 2)	)	Planning Issues

APPLICANTS' FIRST SET OF INTERROGATORIES  
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS  
REGARDING NEW ENGLAND COALITION ON NUCLEAR  
POLLUTION'S CONTENTIONS CONCERNING RG-58 CABLE

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Applicants hereby request that New England Coalition on Nuclear Pollution ("NECNP") respond to the following interrogatories, and produce for inspection and copying the documents requested below. The production of the documents requested herein shall take place at the offices of Ropes & Gray, 225 Franklin Street, Boston, Massachusetts, at 10 A.M. on Monday, August 15, 1988.

Definitions and Guidelines to be Used  
in Responding to this Request

1. The word "document" as used herein shall mean any written matter, whether produced, reproduced or stored on paper, cards, tapes, disks, belts, charts, films, computer

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storage devices or any other medium and shall include, without limitation, matter in the form of books, reports, studies, statements, speeches, notebooks, agreements, appointment calendars, working papers, manuals, memoranda, notes, records, correspondence, diaries, plans, diagrams, drawings, periodicals, lists, telephone logs, minutes, photographs, and any published materials and shall also include, without limitation, originals, copies (with or without notes or changes thereon) and drafts.

2. The word "communications" shall mean correspondence, contact, discussion, or any other kind of written or oral exchange between two or more persons or entities including, but not limited to, all telephone conversations, face-to-face meetings or conversations, visits, conferences, internal and external discussions, and exchange of a document or documents.

3. Applicants request that documents produced in compliance with this request be accompanied with an indication as to the particular paragraphs under which the documents are being produced.

4. In the event that it is claimed that any document responsive to any request is privileged, each privileged document should be fully identified in writing, signed by counsel, except that the substance thereof need not be described to the extent said substance itself is claimed to

be privileged. To "identify" a document claimed to be privileged means to state:

- (a) the date on which the document was prepared;
- (b) the author or authors of the document;
- (c) the addressee(s) and recipient(s) of the document, if any;
- (d) the title of the document;
- (e) the number of pages in the document; and
- (f) the substance of the document to the extent it is not privileged.

5. "Identify" with respect to an expert witness means to state:

- (a) The name, mailing address, age and present professional or employment affiliation of the person;
- (b) The profession or occupation and field of claimed expertise of the person;
- (c) The history of formal education or training of the person, including but not limited to, (i) the name and address of each school where the person received special education or training, (ii) the date those schools were attended, and (iii) a description of each degree earned, including the date and granting institution;
- (d) The history of specialized training in the area of claimed expertise, including, but not limited to, (i) the type of training received, (ii) the name and address

of the institution providing this training, and (iii) the dates of such training;

(e) A list of publications of any kind by the person in the area of claimed expertise, including, but not limited to, (i) the title and subject matter, (ii) the name and address of the publisher, and (iii) the date of publication;

(f) A list of any and all licenses in the area of claimed expertise, including, but not limited to, (i) the designation of the authority by which the license was issued, (ii) the date(s) of the licensing, (iii) the requirements for obtaining each license, and (iv) the manner by which these requirements were met;

(g) The amount of time the person has worked in the field of claimed expertise, stating periods where work was other than on a full-time basis;

(h) The name and address of every person, or every corporation or other institution, that has employed the person within the last ten years of employment;

(i) All periods of claimed self-employment, including a description of all duties and responsibilities thereof;

(j) All previous experience in the field of claimed expertise which involved problems, analyses or studies similar to those concerning which the person is expected to testify in this proceeding;

(k) All other litigation in which the person has been consulted, specifying those matters in which the person has testified, including the name of the case or matter and the court or other forum in which testimony was given; and

(l) Any other experience in the field of claimed expertise.

6. Please include, with the answer to each of the interrogatories that follow, the name, institutional affiliation and professional qualifications, if any, of the person who is answering.

Interrogatories and Requests for Production

1. With respect to NECNP's answers to each of the interrogatories 6 - 15 that follow, is that answer based upon reference to or knowledge of the existence of one or more documents? If so, please:

(a) Identify each such document on which the answer is based.

(b) Identify the information in each document on which the answer is based.

(c) Identify all documents possessed by or known to exist by NECNP which deal with the same subject matter.

(d) Produce all identified documents.

2. With respect to NECNP's answers to each of the interrogatories 6 - 15 that follow, is that answer based upon

any type of study, calculation, procedure, method, instruction, assumption, conclusion, recommendation or analysis? If so, please:

(a) Describe the nature of the study. calculation procedure, method, instruction, assumption, conclusion, recommendation or analysis.

(b) Identify and produce any documents that constitute, discuss or describe it.

(c) Identify the person(s) who performed it, including the institutional affiliation and professional qualifications, if any, of the person(s).

(d) State when and where it was prepared or performed.

(e) Describe in detail the information or data that was examined.

(f) Describe the results.

(g) Explain how it provides a basis for the answer.

3. With respect to NECNP's answers to each of the interrogatories 6 - 15 that follow, is that answer based upon conversations, consultations, correspondence or any other type of communication with one or more individuals or entities? If so, please:

(a) Identify each such individual or entity.

(b) State the educational and professional background of each such individual, including occupation and institutional affiliates.

(c) Describe the nature of each communication with each such individual or entity, when it occurred, and identify all other individuals or entities involved.

(d) Describe in detail the information received from each such individual or entity, and explain how it provides a basis for the answer.

(e) Identify and produce each letter, memorandum, contract, tape, note or other document related to each conversation, correspondence, or other communication with such individual or entity.

4. Does NECNP intend to offer the testimony of any expert witness with respect to the issue remanded in ALAE-891? If so, please:

(a) Identify each expert witness whom NECNP intends to present with respect to this contention.

(b) State the substance of the facts to which each expert witness is expected to testify.

(c) State the substance of the opinion or opinions to which each expert witness is expected to testify.

(d) Provide a summary of the grounds for each opinion to which each expert witness is expected to testify.

(e) State whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, calculation, analysis or other transcript, and, if so, whether NECNP is willing to

produce the same without the necessity of a notice to produce.

(f) State whether the opinion of any expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle.

(g) State whether the opinion of any expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon.

(h) State whether the opinion of any expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

5. Does NECNP intend to offer the testimony of any non-expert witness with respect to the issue remanded in ALAB-891? If so, please:

(a) Identify each non-expert witness whom NECNP intends to present with respect to this contention.

(b) State the substance of the facts to which each non-expert witness is expected to testify.

(c) State the substance of the opinion or opinions to which each non-expert witness is expected to testify.

(d) Provide a summary of the grounds for each opinion to which each non-expert witness is expected to testify.

(e) State whether the facts and opinions listed in response to the foregoing are contained in any written report, memoranda, or other transcript, and, if so, whether NECNP is willing to produce the same without the necessity of a request to produce.

(f) State whether the opinion of any non-expert witness is based in whole or in part on any scientific rule or principle, and, if so, set forth such rule or principle.

(g) State whether the opinion of any non-expert witness is based in whole or in part on any code or regulation, governmental or otherwise, and, if so, identify each such code or regulation and the specific section or portion thereof relied upon.

(h) State whether the opinion of any non-expert witness is based in whole or in part upon any scientific or engineering book or other publication, and, if so, identify the book or publication.

6. Do you assert that RG-58 cable is not environmentally qualified? If so, please state in detail all the facts underlying this assertion and explain exactly how those facts support the assertion.

7. What are the performance specifications for environmentally qualified cable?

8. What is the electrical characteristic that demonstrates that a cable is environmentally qualified?

9. Do you assert that Applicants have not identified all RG-58 cable exposed to a harsh environment that need to be either qualified or replaced with a qualified cable? If so, please state

- (a) which cable(s) did Applicants fail to identify;
- (b) the function(s) performed by each cable;
- (c) the safety-related nature of the function(s) performed by each cable; and
- (d) all the facts underlying this assertion and explain exactly how those facts support the assertion.

10. Do you assert that Applicants did not replace all RG-58 cable exposed to a harsh environment that need to be either qualified or replaced with a qualified cable? If so, please state

- (a) which cable(s) did Applicants fail to replace;
- (b) the function(s) performed by each cable;
- (c) the safety-related nature of the function(s) performed by each cable; and
- (d) all the facts underlying this assertion and explain exactly how those facts support the assertion.

11. Do you assert that there are other RG-58 cables, in

addition to the 12 RG-58 cables replaced, that must be environmentally qualified? If so, please state

- (a) which other cables need to be environmentally qualified;
- (b) the function(s) performed by each cable;
- (c) the safety-related nature of the function(s) performed by each cable; and
- (d) all the facts underlying this assertion and explain exactly how those facts support the assertion.

12. Do you assert that Applicants must replace any RG-58 cables other than the 12 RG-58 cables replaced with RG-59 cable? If so, please state:

- (a) which cable(s) need to be replaced;
- (b) the functions performed by each cable;
- (c) the safety-related nature of the functions performed by each cable; and
- (d) all the facts underlying this assertion and explain exactly how those facts support the assertion.

13. Do you assert that RG-59 cable is not technically qualified to perform the functions required by the 12 RG-58 cables that were replaced? If so, please state for each cable

- (a) the function(s) that cannot be performed;

- (b) the conditions under which the function(s) cannot be performed;
- (c) the safety-related nature of the function(s);
- (d) the nature of the technical inadequacy;
- (e) the effect of this technical inadequacy on functional performance; and
- (f) all the facts underlying this assertion and explain exactly how those facts support the assertion.

14. Do you continue to assert the facts and opinions expressed in the affidavits you have filed before the Licensing Board and Appeal Board following the issuance of ALAB-891? If any of these facts or opinions have changed, please identify them and describe the reasons for the changes.

15. Identify all individuals on whose knowledge or opinions you relied in each of the filings before the Licensing Board and Appeal Board since the issuance of ALAB-891. For each of

these individuals, describe that portion of the filing for which you relied on that individual.

By their attorneys,

*Jay Bradford Smith*  
\_\_\_\_\_  
Thomas G. Dignan, Jr.  
Deborah S. Steenland  
Jay Bradford Smith  
Ropes & Gray  
225 Franklin Street  
Boston, MA 02110  
(617) 423-6100

CERTIFICATE OF SERVICE

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I, Jay Bradford Smith, one of the attorneys for the Applicants herein, hereby certify that on August 1, 1988, I made service of the within document by depositing copies thereof with Federal Express, prepaid, for delivery to (or where indicated, by depositing in the United States mail, first class postage paid, addressed to) the individuals listed below.

Administrative Judge Sheldon J. Wolfe, Esq., Chairman, Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

Robert Carrigg, Chairman  
Board of Selectmen  
Town Office  
Atlantic Avenue  
North Hampton, NH 03862

Administrative Judge Emmeth A. Luebke  
4515 Willard Avenue  
Chevy Chase, MD 20815

Diane Curran, Esquire  
Andrea C. Ferster, Esquire  
Harmon & Weiss  
Suite 430  
2001 S Street, N.W.  
Washington, DC 20009

Dr. Jerry Harbour  
Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

Stephen E. Merrill  
Attorney General  
George Dana Bisbee  
Assistant Attorney General  
Office of the Attorney General  
25 Capitol Street  
Concord, NH 03301-6397

Adjudicatory File  
Atomic Safety and Licensing Board Panel Docket (2 copies)  
U.S. Nuclear Regulatory Commission  
East West Towers Building  
4350 East West Highway  
Bethesda, MD 20814

Sherwin E. Turk, Esquire  
Office of General Counsel  
U.S. Nuclear Regulatory Commission  
One White Flint North, 15th Fl.  
11555 Rockville Pike  
Rockville, MD 20852

\*Atomic Safety and Licensing Appeal Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Robert A. Backus, Esquire  
Backus, Meyer & Solomon  
116 Lowell Street  
P.O. Box 516  
Manchester, NH 03105

Philip Ahrens, Esquire  
Assistant Attorney General  
Department of the Attorney  
General  
Augusta, ME 04333

Paul McEachern, Esquire  
Matthew T. Brock, Esquire  
Shaines & McEachern  
25 Maplewood Avenue  
P.O. Box 360  
Portsmouth, NH 03801

Mrs. Sandra Gavutis  
Chairman, Board of Selectmen  
RFD 1 - Box 1154  
Route 107  
Kensington, NH 03827

\*Senator Gordon J. Humphrey  
U.S. Senate  
Washington, DC 20510  
(Attn: Tom Burack)

\*Senator Gordon J. Humphrey  
One Eagle Square, Suite 507  
Concord, NH 03301  
(Attn: Herb Boynton)

Mr. Thomas F. Powers, III  
Town Manager  
Town of Exeter  
10 Front Street  
Exeter, NH 03833

H. Joseph Flynn, Esquire  
Office of General Counsel  
Federal Emergency Management  
Agency  
500 C Street, S.W.  
Washington, DC 20472

Gary W. Holmes, Esquire  
Holmes & Ells  
47 Winnacunnet Road  
Hampton, NH 03341

Mr. J. P. Nadeau  
Selectmen's Office  
10 Central Road  
Rye, NH 03870

Carol S. Sneider, Esquire  
Assistant Attorney General  
Department of the Attorney General  
One Ashburton Place, 19th Floor  
Boston, MA 02108

Mr. Calvin A. Canney  
City Manager  
City Hall  
126 Daniel Street  
Portsmouth, NH 03801

R. Scott Hill-Whilton, Esquire  
Lagoulis, Clark, Hill-Whilton &  
McQuire  
79 State Street  
Newburyport, MA 01950

Mr. Peter J. Matthews  
Mayor  
City Hall  
Newburyport, MA 01950

Mr. William S. Lord  
Board of Selectmen  
Town Hall - Friend Street  
Amesbury, MA 01913

Charles P. Graham, Esquire  
Murphy and Graham  
33 Low Street  
Newburyport, MA 01950

Richard A. Hampe, Esquire  
Hampe and McNicholas  
35 Pleasant Street  
Concord, NH 03301

Mr. Ed Thomas  
FEMA, Region I  
442 John W. McCormack Post  
Office and Court House  
Post Office Square  
Boston, MA 02109

Judith H. Mizner, Esquire  
79 State Street  
Second Floor  
Newburyport, MA 01950

*Jay Bradford Smith*  
\_\_\_\_\_  
Jay Bradford Smith

(\* = Ordinary U.S. First Class Mail.)