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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 88 JUN -6 A9:01

In the Matter of:)	
)	
FLORIDA POWER AND LIGHT COMPANY)	Docket No.: 50-335-OLA
)	
(St. Lucie Plant, Unit 1))	ASLBP No.: 88-560-01-LA
)	

OFFICE OF SECRETARY
DOCKETING & SERVICE
BETHLEHEM

LICENSEE'S FIRST SET
OF INTERROGATORIES TO INTERVENOR

Florida Power and Light Company (Licensee) hereby serves its first set of interrogatories to Campbell Rich (Intervenor) pursuant to 10 C.F.R. § 2.740b. Each interrogatory is to be answered separately, fully, in writing, and under oath or affirmation within 14 days after service. Each answer should clearly indicate the interrogatory to which it responds.

The interrogatories are divided into two sections. Section I consists of five general interrogatories which should be answered for each and every contention admitted by the Board in this proceeding. Section II consists of interrogatories that are specific to particular contentions.

I. GENERAL INTERROGATORIES (to be answered for each and every admitted contention):

A. State whether Intervenor intends to call any person or persons as witnesses, including expert witnesses, in this proceeding in support of each contention and, if so, identify any and all such persons giving the name, address and professional qualifications of each.

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B. Provide summaries of the views, positions, or proposed testimony on each contention of all persons identified in response to interrogatory I.A. that Intervenor intends to present during this proceeding.

C. Identify all documents, books, reports, papers, studies, analyses and calculations that Intervenor intends to employ or rely upon in presenting his direct case on each contention.

D. Identify all documents, books, reports, papers, studies, analyses, and calculations that Intervenor intends to employ or rely upon in conducting cross examination of NRC Staff and/or Licensee witnesses testifying in connection with each contention.

E. If the representations made in any contention or in the bases for any contention are based in whole or in part on Intervenor's belief that certain documents, books, reports, papers, studies, analyses or calculations, including but not limited to those prepared by the Licensee or the NRC Staff, are deficient, identify the documents, books, reports, papers, studies, analyses or calculations, and identify any particular portions thereof Intervenor regards as deficient; explain the way they are deficient, and identify all documents, books, reports, papers, studies, analyses, calculations or expert opinions relied upon by Intervenor that provide support for Intervenor's claim that a deficiency exists.

II. SPECIFIC INTERROGATORIES:

A. Admitted Contention 1 (originally Amended Petition Contention 3):

1. Identify the specific regulatory criteria of 10 C.F.R. Part 100 that Intervenor claims will be exceeded as a result of a cask drop accident at the St. Lucie 1 spent fuel pool.

2. Specify how, why, and in what manner the relevant portions of 10 C.F.R. Part 100, identified above, would be exceeded.

3. Specify how, why, and in what manner the calculation of radiological consequences from a cask drop accident is not conservative including

a. precisely what uncertainties have not been bounded, why these uncertainties must be bounded, and how these uncertainties have not been properly bounded;

b. what Intervenor means in the bases' reference to "uncertainty in the accident progression (fuel temperature after clad oxidation and fuel relocation occurs) and the uncertainty in fission product decontamination" and why it is necessary to consider such uncertainties;

c. precisely what regulatory requirements and/or guidance, if any, Intervenor believes were not complied with in performing the calculation, why compliance was necessary, and why the calculation failed to meet the regulatory requirements and/or guidance;

d. precisely what assumptions were not conservative, and how and why those assumptions were not conservative, with particular reference but not limited to assumptions concerning accident progression.

4. Identify any and all documents, books, reports, papers, studies, analyses, calculations, or expert opinions which Intervenor claims provide support for this contention.

B. Admitted Contention 2 (originally Amended Petition Contention 4):

1. Identify those accidents which Intervenor believes are "similar in nature and effect" to a cask drop accident and state how and why they are similar.

2. Specify how, why, and in what manner the presence of the temporary construction crane inside the fuel handling building to facilitate the reracking could increase the consequences of "a cask drop accident or an accident similar in nature and effect."

3. Specify how, why, and in what manner the presence of the temporary crane would contribute "to the potential for a heavy load drop in the pool" and "inhibit the ability of the existing cranes to operate, if needed, in any recovery action."

4. Identify the specific regulatory criteria of 10 C.F.R. Part 100 that Intervenor claims will be exceeded as a result of a cask drop accident at the St. Lucie 1 spent fuel pool, if any.

5. Specify how, why, and in what manner any and all of the relevant portions of 10 C.F.R. Part 100, identified in response to interrogatory II.B.4, above, would be exceeded.

6. Specify in what manner, if any, the calculation of radiological consequences from "a cask drop accident or an accident similar in nature and effect" involving the temporary construction crane is not conservative.

7. Identify any and all documents, books, reports, papers, studies, analyses, calculations, or expert opinions which Intervenor claims provide support for this contention.

C. Admitted Contention 3 (originally Amended Petition Contention 6):

1. Does Intervenor contend that the NRC Staff in its Safety Evaluation has not adequately analyzed, calculated or otherwise considered the "materials deterioration or failure in materials integrity" of the spent fuel pool, part of the spent fuel pool or fuel cladding? If so, identify the specific sections of the Safety Evaluation that Intervenor contends are deficient and explain why and how these sections are deficient with specific reference to increased exposure to heat and radiation.

2. Does Intervenor contend that Licensee in its Safety Analysis Report, Rev. 1 (SAR), has not adequately analyzed, calculated or otherwise considered the "materials deterioration or failure in materials integrity" of the spent fuel pool, part of the spent fuel pool or fuel cladding? If so, identify the

specific sections of Licensee's SAR that Intervenor contends are deficient and explain how these sections are deficient with specific reference to increased exposure to heat and radiation.

3. Identify any and all documents, books, reports, papers, studies, analyses, calculations, or expert opinions which Intervenor claims provide support for this contention.

D. Admitted Contention 4 (originally Amended Petition Contention 8):

1. Identify how "higher heat loads and increases in water temperature . . . could cause a loss-of-cooling accident."

2. Identify the systems the "reliability or testibility" of which will be "challenge[d]" due to "higher heat loads and increases in water temperature" and explain how and why they will be challenged.

3. Identify the "numerous documents" where the NRC Staff has stated that the "water in spent fuel pools would normally be kept below 122 degrees F."

4. Identify the specific sections in the documents referred to in the answer to interrogatory II.D.3. where the NRC Staff has made the statement regarding the 122 degrees F.

5. Identify the documents and specific sections therein where it is stated that "after the reracking, the temperature of the water would rise to 152 degrees F on a normal basis, and could reach 182 degrees F with a full core load."

6. Identify the causes for delay in the delivery of "make-up emergency water," referred to in the bases, the probability of delay for each cause, and the duration of delay for each cause.

7. Identify any and all documents, books, reports, papers, studies, analyses, calculations, or expert opinions which Intervenor claims provide support for this contention.

E. Admitted Contention 5 (originally Amended Petition Contention 9):

1. Does Intervenor contend that the design of the cooling system and/or electrical power system fails to meet applicable NRC requirements? If so, identify these requirements specifically, explain how and why the cooling and/or electrical power system fails to meet each such requirement, and identify all documents, books, reports, papers, studies, analyses, calculations or expert opinions relied upon by Intervenor that provide support for Intervenor's position.

2. Specify how and why the electrical power system for the St. Lucie 1 spent fuel pool cooling system is vulnerable to "humidity, wear and radiation."

3. Identify any and all documents, books, reports, papers, studies, analyses, calculations, or expert opinions which Intervenor claims provide support for this contention.

F. Admitted Contention 6 (originally Amended Petition Contention 11):

1. Define the terms "untested" and "new and unproven technology" as utilized in the contention and the stated bases for the contention.

2. Does Intervenor contend that the Licensee's Safety Analysis Report, Rev. 1 (SAR), does not correctly or adequately address the issues raised by the NRC Staff concerning the use of Boroflex? If so, identify the NRC Staff issues, the specific sections of Licensee's SAR that Intervenor contends are deficient, and explain how these sections are deficient.

3. Identify any and all documents, books, reports, papers, studies, analyses, calculations, or expert opinions which Intervenor claims provide support for this contention.

G. Admitted Contention 7 (originally Amended Petition Contention 15):

1. Identify the specific requirements of ANSI-N16-1975 that will not be met if the spent fuel pool capacity is increased, and how and why the requirements will be violated.

2. Explain precisely how and why the "increase in spent fuel capacity" will "increase the probability that a criticality accident will occur in the spent fuel pool."

3. Explain precisely how "increase in spent fuel capacity" will "exceed 10 C.F.R. Part 50, A 62 criterion."

4. Identify the specific limitations of 10 C.F.R. Part 100 that will be exceeded by any potential radiation release from the spent fuel pool, and how, why and to what extent the limitations will be exceeded.

5. Explain why and how the "increase in the number of fuel rods stored and the fact that many of them . . . may be more highly enriched and have more reactivity" will increase the possibility that a criticality accident will occur in the St. Lucie 1 spent fuel pool and "perhaps, [an] explosion."

6. Identify any and all documents, books, reports, papers, studies, analyses, calculations, or expert opinions which Intervenor claims provide support for this contention.

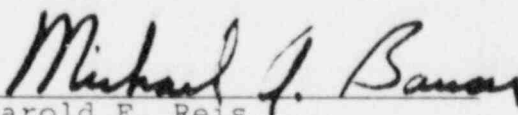
Dated: June 2, 1988

Respectfully submitted,

Co-Counsel:
John T. Butler

STEEL HECTOR & DAVIS
4000 Southeast Financial
Center
Miami, FL 33131-2398

(305) 577-2939


Harold F. Reis
Michael A. Bauser

NEWMAN & HOLTZINGER, P.C.
1615 L St., N.W., Ste. 1000
Washington, D.C. 20036

(202) 955-6600

Counsel for:
Florida Power & Light Company

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

FLORIDA POWER AND LIGHT COMPANY)

(St. Lucie Plant, Unit No. 1))
_____)

) Docket No. 50-335-OLA

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's First Set of Interrogatories to Intervenor" were served on the following by deposit in the United States mail, first class, postage prepaid and properly addressed, on the date shown below:

B. Paul Cotter, Jr., Chairman
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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

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

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

Adjudicatory File
Atomic Safety and Licensing Board Panel Docket
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
(Two copies)

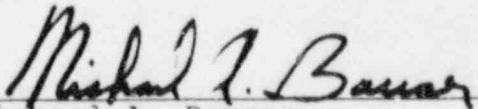
Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attention: Chief, Docketing and Service Section
(Original plus two copies)

Benjamin H. Vogler, Esquire
Office of General Counsel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Campbell Rich
4626 S.E. Pilot Avenue
Stuart, Florida 34997

Dated this 2nd day of June, 1988.



Michael A. Bauser

Newman & Holtzinger, P.C.
1615 L St., N.W., Suite 1000
Washington, D.C. 20036

Telephone: (202) 955-6600

Counsel for
FLORIDA POWER & LIGHT COMPANY