

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)	Docket No. 50-549
(Greene County Nuclear Power Plant))	

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STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE BOARD ON
ELECTRIC GENERATION SITING AND THE ENVIRONMENT

In the Matter of the Application of the)	
POWER AUTHORITY OF THE STATE OF)	
NEW YORK)	Case 80006
(Greene County Nuclear Generating)	
Facility))	

NRC STAFF INTERROGATORIES TO, AND
REQUEST FOR PRODUCTION OF DOCUMENTS FROM,
LEHIGH PORTLAND CEMENT COMPANY

Pursuant to 10 CFR 52.741 of the Commission's Rules of Practice, the NRC Staff hereby requests that Lehigh Portland Cement Company (LPCC) answer separately and fully in writing and under oath the interrogatories set forth below.

Pursuant to the rulings of the Joint Boards in this proceeding, responses to these interrogatories should be signed by the person(s) who prepared them and footnoted to the sources upon which they are based.

The interrogatories attached are to be considered LPCC's continuing obligation. Accordingly, if, after LPCC has answered these interrogatories,

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additional information comes to its attention with respect to any of the answers, the answers should be amended to provide such additional information.

The NRC further requests that LPCC, pursuant to 10 CFR §2.741, provide copies of, or make available for Staff inspection and copying, any documents not previously provided to the Staff which are designated by LPCC in response to the accompanying interrogatories.

I. Market and Sales

- M1. What is Lehigh's approximate share of the Northeast cement market for each of the last three years?
- M2. What percentage of Lehigh's national cement sales does its Northeast sales comprise for each of the last three years?
- M3. What percentage of Lehigh's national cement earnings does its Northeast earnings comprise for each of the past three years?
- M4. What relationship does Lehigh's Northeast market performance have to Lehigh's overall market viability?

II. Considerations of the Lehigh Board of Directors

- L1. 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?
- L2. 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?
- L3. 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?
- L4. 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?
- L5. 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?
- L6. 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?

- L7. If such discussions have occurred, what candidates for such purchase have been identified, and where are they located?
- L8. 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?
- L9. 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?
- L10. 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?
- L11. 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?

III. Considerations of the Heidelberg Management Board

- H1. Has the Heidelberg management board 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?
- H2. In the event that the GCNP is built on Lehigh property at Cementon, has the Heidelberg management board determined either formally or informally that its production facilities at Cementon must be closed permanently?
- H3. 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 Heidelberg management board given consideration either formally or informally to what alternatives the company should take in response to this closing of its facilities?
- H4. In the event of such a loss of the Cementon facilities, has the Heidelberg management board either formally or informally determined that it is not feasible to construct an entirely new facility at a virgin or "greenfield" site?
- H5. Has the Heidelberg management board 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?

- H6. In the event of a loss of the Cementon facilities, has the Heidelberg management board either formally or informally discussed the feasibility of purchasing the existing (operating or non-operating) facilities of another cement manufacturer?
- H7. If such discussions have occurred, what candidates for such purchase have been identified, and where are they located?
- H8. In the event of a loss of the Cementon facilities, has the Heidelberg management board either formally or informally discussed the feasibility of purchasing the adjoining properties of the Alpha and/or Marquette companies?
- H9. In the event of such discussions, has the Heidelberg board initiated or caused to be initiated any analysis of the feasibility of a purchase of either the adjoining Alpha or Marquette properties?
- H10. Has the Heidelberg management board 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?
- H11. In the event of the above described loss of Lehigh's production facilities at Cementon, has the Heidelberg management board 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?

IV. Considerations of Other Groups

01. Has any Lehigh or Heidelberg working group given any consideration either in formal or informal proceedings to the loss of the facilities at Cementon as a result of the construction of the Greene County Nuclear Plant (GCNP) at the Cementon site?
02. In the event that the GCNP is built on Lehigh property at Cementon, has any Lehigh or Heidelberg working group determined either formally or informally that the production facilities at Cementon must be closed permanently?
03. In the event that the GCNP is built on the Lehigh property, and that such a development causes the closing of the facility, has any Lehigh or Heidelberg working group given consideration either formally or informally to what alternatives the company should take in response to this closing of its facilities?
04. In the event of such a loss of the Cementon facilities, has any Lehigh or Heidelberg working group either formally or informally determined that it is not feasible to construct an entirely new facility at a virgin or "greenfield" site?

05. Has any Lehigh or Heidelberg working group 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?
06. In the event of a loss of the Cementon facilities, has any Lehigh or Heidelberg working group either formally or informally discussed the feasibility of purchasing the existing (operating or non-operating) facilities of another cement manufacturer?
07. If such discussions have occurred, what candidates for such purchase have been identified, and where are they located?
08. In the event of a loss of the Cementon facilities, has any Lehigh or Heidelberg working group either formally or informally discussed the feasibility of purchasing the adjoining properties of the Alpha and/or Marquette companies?
09. In the event of such discussions, has any Lehigh or Heidelberg working group initiated or caused to be initiated any analysis of the feasibility of a purchase of either the adjoining Alpha or Marquette properties?
010. Has any Lehigh or Heidelberg working group 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?
011. In the event of the above described loss of Lehigh's production facilities at Cementon, has any Lehigh or Heidelberg working group 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?

V. Documentation

- D1. Submit any documentation which provides a basis for the answers given to the interrogatories listed above.

Respectfully submitted,

Vicki R. Harding

Vicki R. Harding
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 22nd of September, 1978