

of the interrogatories, and shall state when Intervenors expect to be able to answer any unanswered portions.

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

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

A. State whether Intervenors intend 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.

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

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

D. Identify all documents, books, reports, papers, studies, analyses and calculations that Intervenors intend to employ or rely upon in conducting cross examination of the NRC

Staff and/or Licensee witnesses testifying in connection with each contention.

E. Identify any and all documents, books, reports, papers, studies, analyses, calculations, or expert opinions which Intervenors claim provide support for each contention.

F. Identify the relevant documents, books, reports, papers, studies, analyses or calculations prepared by the Licensee or NRC Staff which Intervenors contend are deficient, and identify any particular portions thereof Intervenors regard as deficient; explain the manner in which they are deficient; and identify all documents, books, reports, papers, studies, analyses, calculations or expert opinions relied upon by Intervenors that provide support for Intervenors' claim that a deficiency exists.

II. SPECIFIC INTERROGATORIES AND DOCUMENT REQUESTS:

A. Admitted Contention 2:

1. Identify the basis for Intervenors' assertion (as interpreted by the Licensing Board, Memorandum and Order (June 8, 1989), p. 17) that the Licensee's conduct of the integrated surveillance test program at Turkey Point fails to meet the requirements of the program itself.

2. Identify the specific portions of 10 CFR Part 50 Appendices G and H which support Intervenors' claim that the Licensee's conduct of the integrated surveillance test program is improper.

3. Identify the basis for Intervenor's assertion (as interpreted by the Licensing Board, Memorandum and Order (June 8, 1989), pp. 17-18) that the operating history of Turkey Point Units 3 and 4 are significantly different for purposes of the integrated surveillance test program.

4. Identify the basis for Intervenor's assertion (as interpreted by the Licensing Board Memorandum and Order (June 8, 1989), pp. 17-18) that the Unit 3 capsule material has been irradiated for a significantly shorter period of time than the capsule material in Unit 4.

5. Do you agree that the design and operating features of the Turkey Point Units 3 and 4 reactors are, and have been, similar? If not, please provide the basis for your answer.

6. Are you contending that Turkey Point Unit 3 and/or Turkey Point Unit 4 have experienced periods of operation at reduced power levels and/or extended outages of sufficient extent since April 22, 1985, to affect the validity of the integrated surveillance test program for these units. If yes, please specifically identify each such period (by unit, dates, and cause of outage or reduced power operation) and the bases for your contention that an outage or reduced power operation of either unit affected the validity of the integrated surveillance test program.

7. Identify the basis for the statement in the Bases for Contention 2 that FPL "chose only to use capsule V test data" from Turkey Point Unit 3 in predicting RT_{NDT} and revising the heat-up and cooldown limits. Do you agree that FPL used test data from both Turkey Point Unit 3 and Unit 4 in predicting RT_{NDT} and revising these curves? If not, identify the basis for your disagreement.

8. Identify the basis for your statement (Transcript pages 64-65) that FPL "must, according to their own regulations, use the most limiting RT_{NDT} ." Identify specifically the "regulations" to which you referred.

9. Identify the basis for the statement in Contention 2 that using surveillance capsules from Turkey Point Unit 3 to help predict the RT_{NDT} for Unit 4 "is not scientific, not valid." Furthermore, identify all documents, books, reports, papers, studies, analyses, calculations, or other scientific data which Intervenors intend to rely on in support of this assertion.

10. Identify the basis for the statement in Contention 2 that the Turkey Point integrated surveillance program does not meet the criteria in 10 CFR Part 50 Appendices G and H.

11. Please provide a copy of the Southwest Research Institute report on the Reactor Vessel Material Surveillance

Program for Turkey Point Units 3 and 4, dated May 1979, referenced in the bases for Contention 2.

12. Please provide copies of the following documents referenced by Intervenors at the March 21, 1989, pre-hearing conference in connection with Contention 2.

(a) Southwest Research Institute Report, August 1986. (Transcript, page 30)

(b) "Analysis of Capsule T from FPL Turkey Point Number 3 Reactor Vessel Surveillance Program, December, 1985," Westinghouse Electric Corp. (Transcript, pages 69-70)

(c) "Reactor Vessel Material Surveillance Program for Turkey Point Unit Number 4, Analysis of Capsule T, June 14, 1976" by Southwest Research Institute. (Transcript, page 70)

B. Admitted Contention 3:

1. Identify the basis for the statement in Contention 3 that the copper content used in predicting the RT_{NDT} in the weld materials for the Turkey Point reactor vessels was "unrealistically low."

2. Identify the basis for the statement in Contention 3 contention that P/T limits are required by 10 CFR Part 50 Appendices G and H to be "based on the most limiting value of RT_{NDT} ." Identify the specific subsections

of Appendices G and H which allegedly contain such a requirement.

3. What value of copper content do Intervenors contend should have been used in calculating the RT_{NDT} for Turkey Point Units 3 and 4? Please provide the basis for your answer.

4. Do you agree that 0.26% represents the mean value of the copper content of the weld material for the Turkey Point reactor vessels? If not, please provide the basis for your answer.

5. Identify the basis for the statement in Contention 3 that FPL's specification of the copper content of the reactor vessel welds is "non-conservative." Furthermore, identify the relevant sections of any document which supports this assertion.

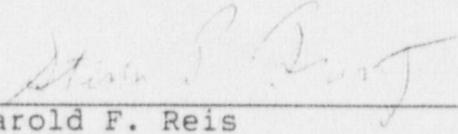
6. Please provide copies of the following documents referenced by Intervenors at the March 21, 1989 pre-hearing conference in connection with Contention 3 .

(a) Babcock and Wilcox document discussing the pressure vessels. (Transcript, page 72)

(b) Babcock and Wilcox 1556. (Transcript, page 84)

(c) Babcock and Wilcox 10144-A. (Transcript,
pages 84-85).

Respectfully submitted,



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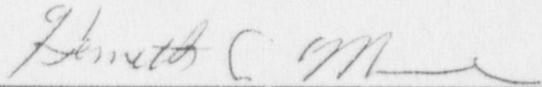
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Dated this 21st day of June 1989.


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