

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:  
Thomas S. Moore, Chairman  
Charles N. Kelber  
Peter S. Lam

DOCKETED  
USNRC

December 13, 2002 (2:36PM)

OFFICE OF SECRETARY  
RULEMAKINGS AND  
ADJUDICATIONS STAFF

In the Matter of	)	December 6, 2002
	)	
DUKE COGEMA STONE & WEBSTER	)	Docket No. 070-03098-ML
	)	
(Savannah River Mixed Oxide Fuel	)	ASLBP No. 01-790-01-ML
Fabrication Facility)	)	

**DUKE COGEMA STONE & WEBSTER'S  
SECOND SET OF INTERROGATORIES TO  
GEORGIANS AGAINST NUCLEAR ENERGY AND  
BLUE RIDGE ENVIRONMENTAL DEFENSE LEAGUE**

Duke Cogema Stone & Webster ("DCS") hereby makes the following formal discovery requests of the Georgians Against Nuclear Energy ("GANE") and the Blue Ridge Environmental Defense League ("BREDL").

**I. General Definitions**

DCS incorporates fully by reference General Definitions 1-12 as set forth in Duke Cogema Stone & Webster's First Set of Interrogatories to Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League.

13. "DCS's First Set of Interrogatories" refers to Duke Cogema Stone & Webster's First Set of Interrogatories to Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League (May 31, 2002).

## **II. Instructions**

DCS incorporates fully by reference its Instructions as set forth in DCS's First Set of Interrogatories.

## **III. General Interrogatories**

These General Interrogatories apply to all Admitted Contentions, and are in addition to the Specific Interrogatories which follow:

GENERAL INTERROGATORY NO. 4. For each Admitted Contention, in the event that GANE or BREDL has obtained or discovered any information responsive to DCS's First Set of Interrogatories in addition to those responses identified in Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League Objection and Responses to Applicant's First Set of Interrogatories, and Request for Protective Order (June 28, 2002), please update and supplement those responses. Identify each response as "Amended Response [number]" and state whether the response is in addition to, or supercedes, the original response.

GENERAL INTERROGATORY NO. 5. For each Admitted Contention, describe the subject matter, facts, and opinions to which each of your witnesses is expected to testify at the Hearing, including a summary of the grounds for each opinion. Regardless of whether GANE or BREDL has prepared testimony on any of the Admitted Contentions, a summary of the subject matter, facts, and opinions in such testimony should be provided at this time.

GENERAL INTERROGATORY NO. 6. For each Admitted Contention, identify the documents (including cites to pertinent pages or parts thereof), data or other information which each witness has reviewed and considered, or is expected to consider or to rely on

for his or her testimony. Please identify the location where, and time when, such documents will be made available to DCS for copying.

#### IV. Specific Interrogatories

##### A. GANE Contention 1 (Consideration of Safeguards in Facility Design)

INTERROGATORY NO. 1.23 In GANE's response to INTERROGATORY NO. 1.2, it never identified whether it believes that a vulnerability assessment is required to satisfy any NRC material control and accounting ("MC&A") regulation applicable to the MOX Facility. Does GANE believe that a vulnerability assessment is required to satisfy any NRC MC&A regulation applicable to the MOX Facility? If so, identify the particular regulation and explain why GANE believes that the regulation requires a vulnerability assessment. Provide citations to any statute, regulation, guidance, standard, or caselaw upon which you rely.

INTERROGATORY NO. 1.24 Does GANE agree that design bases for the MC&A requirements for the MOX Facility are now contained in the revised CAR? If not, explain the bases for your disagreement and provide citations to any statute, regulation, guidance, standard, or caselaw upon which you rely.

INTERROGATORY NO. 1.25 Please identify the specific NRC regulation or regulations that require(s) a licensee to control or limit holdup accumulation of process materials. If any such regulation(s) exist, please identify whether they require: (a) design features to control or minimize holdup accumulation; or (b) any particular degree, percentage or quantity of holdup accumulation to be prevented, controlled or limited. Explain the bases for your position.

**B. GANE Contention 2 (Consideration of Physical Protection in Facility Design)**

INTERROGATORY NO. 2.13 Does GANE agree that design bases for the physical security system at the MOX Facility are now contained in the revised CAR? If not, explain the bases for your disagreement and provide citations to any statute, regulation, guidance, standard, or caselaw upon which you rely.

INTERROGATORY NO. 2.14 In light of the information provided by DCS in the revised CAR, identify and fully explain GANE's position regarding whether DCS has complied with each aspect of the national and international standards and recommendations listed in GANE's response to INTERROGATORY NO. 2.4.

INTERROGATORY NO. 2.15 In light of the information provided by DCS in the revised CAR, identify and fully explain each respect in which GANE claims, in the basis statement for Contention 2, that there might be "a direct conflict...between physical protection requirements...and safety requirements."

**C. GANE Contention 3 (Seismic Design)**

INTERROGATORY NO. 3.41 GANE's response to INTERROGATORY NO. 3.1 references "Christian (1988)." Please provide a complete citation and identify how this reference could be obtained by DCS.

INTERROGATORY NO. 3.42 GANE's response to INTERROGATORY NO. 3.1 says that "Following Christian (1988), one should consider an epicenter for the largest event of an adjacent seismotectonic province at the point closest to the design site."

- (a) Has Christian (1988) ever been accepted by the NRC or DOE for use in determining the seismic response spectra of a site? If yes, please identify the NRC or DOE document that so accepts Christian (1988).

- (b) Has the NRC or DOE ever accepted the proposition that the design response spectra should consider an epicenter for the largest event of an adjacent seismotectonic province at the point closest to the design site. If yes, please identify the NRC or DOE document that so accepts that proposition.
- (c) 10 CFR § 70.64(a)(2) states that “the design must provide for adequate protection against natural phenomena with consideration of the most severe documented historical events for the site.” Do you contend that the proposition discussed above is consistent with this provision in § 70.64(a)(2)? If yes, provide the regulatory, scientific, technical, legal, and any other bases for your answer.

INTERROGATORY NO. 3.43 As indicated on pages 1.3.5-27 and 28 of the revised CAR, during the summer of 2002, DCS conducted supplemental geotechnical investigations of the MOX Facility site to acquire additional subsurface information regarding the MOX Facility site, and the results of these investigations are consistent with the results of the initial site investigations. In light of these additional investigations at the MOX Facility site, is GANE still contending that a quantitative site response study for the MOX Facility site has not been done? If yes, provide the regulatory, scientific, technical, legal, and any other bases for your answer.

INTERROGATORY NO. 3.44 In response to INTERROGATORY NO. 3.7, GANE identified only two bases for its claim that “conservative design criteria” have not been established in the CAR. Please provide an exhaustive list of all the bases upon which GANE relies.

INTERROGATORY NO. 3.45 As a follow-up to GANE’s response to INTERROGATORY NO. 3.10:

- (a) Identify the “seismic source regions” that DCS should have, but did not, consider. Provide the regulatory, scientific, technical, legal, and any other bases for your contention that DCS should consider such seismic source regions.

- (b) Identify the “analysis methods” that DCS should have, but did not, use. Provide the regulatory, scientific, technical, legal, and any other bases for your contention that DCS should have used such methods.
- (c) If DCS were to use the “seismic source regions” and “analysis methods” identified in your answers above, would there be any change in the seismic response spectra for the MOX Facility site? If yes, provide the regulatory, scientific, technical, legal, and any other bases for your answer, and describe the change.

INTERROGATORY NO. 3.46 In response to INTERROGATORY NO. 3.11, GANE responded that the answer was “self-evident.” DCS does not believe the answer is self-evident. Please fully elaborate on this answer and explain why it is self-evident.

INTERROGATORY NO. 3.47 In response to INTERROGATORY NO. 3.16, GANE stated that “repeat earthquakes at the same location could well have a substantially larger magnitude.”

- (a) Provide citations to the authority for this proposition; and
- (b) Identify what range of values GANE intended to refer to when it used the word “substantially” in this context.

INTERROGATORY NO. 3.48 In response to INTERROGATORY NO. 3.22, GANE stated that the “geologic structure” is “different” over a 700 foot distance from the MOX Facility. Please specify:

- (a) how the geologic structure is “different”; and
- (b) how this different geologic structure would result in significantly different ground motion on the MOX Facility site.

INTERROGATORY NO. 3.49 GANE’s responses to INTERROGATORY NOS. 3.22 and 3.25 reference the geotechnical report (Hearing Record Document # 50) and state that of the 13 Seismic Cone Penetration Tests (“SCPT”), only one was on the proposed MOX Facility site and the remainder were to the east. Do you agree that the

geotechnical report, Figure 5-1, actually shows that there were 15 SCPTs on the MOX Facility site, including one directly beneath the proposed location of the MOX Fuel Fabrication Building? If not, please explain the bases for your disagreement.

INTERROGATORY NO. 3.50 Is GANE contending that a magnitude 7 event at Bluffton would have a greater impact on the seismic response spectra of the MOX Facility than a magnitude 7 event at Charleston, S.C.? If yes, provide the regulatory, scientific, technical, legal, and any other bases for your answer.

INTERROGATORY NO. 3.51 GANE states that it relies on the National Seismic Hazard Mapping Project. Has the National Seismic Hazard Mapping Project ever been accepted by the NRC or DOE for use in determining the seismic response spectra of a site? If yes, please identify the NRC or DOE document that so accepts the National Seismic Hazard Mapping Project.

INTERROGATORY NO. 3.52 GANE's response to INTERROGATORY NO. 3.34(c) says that the frequency of major events in the South Carolina Plain is greater than identified in the CAR, based upon the Talwani and Schaeffer paper that identifies seven events between 5,800 years ago and 1886, versus the four events identified in the CAR.

- (a) Do you agree that, of the seven events identified in Scenario 1 of Table 3 of the Talwani and Schaeffer paper, only four of those events are magnitude 7 or greater, whereas the other three are magnitude 6? If not, provide the basis for your answer.
- (b) Do you agree that the CAR accounts for each of the four events identified as magnitude 7 or greater in Scenario 1 of Table 3 of the Talwani and Schaeffer paper? If not, provide the basis for your answer.
- (c) Do you agree that, even if the CAR had accounted for the three events identified as magnitude 6 in Scenario 1 of Table 3 of the Talwani and Schaeffer paper, there would be no change in the seismic response spectra for the MOX Facility or its frequency?

**D. GANE Contention 6 (Safety Analysis)**

INTERROGATORY NO. 6.36 In GANE's response to INTERROGATORY NO.

6.4:

- (a) It never identified what HEPA filter efficiency value(s) should be used under accident conditions at the MOX Facility. Identify and fully explain what HEPA efficiency values should be used under accident conditions, in GANE's opinion.
- (b) In addition, GANE stated "DCS has not justified the use of a 99% efficiency factor, which is nonconservative according to NUREG/CR-6410." What specific statement or item in NUREG/CR-6410 does GANE refer to?

Identify the regulatory, scientific, technical, legal, and any other bases on which GANE bases its response, and provide citations to any statute, regulation, guidance, standard, or caselaw upon which you rely.

INTERROGATORY NO. 6.37 As a follow-up to INTERROGATORY NO. 6.17, identify and fully explain any bases GANE has for believing that DCS "has not looked at all credible high-consequence accidents." Identify all "credible high-consequence accidents" which GANE believes DCS has not considered. Identify the regulatory, scientific, technical, legal, any other bases on which GANE bases its response.

INTERROGATORY NO. 6.38 GANE stated in response to INTERROGATORY NO. 6.23 that it did not agree with DCS's response to the June 8, 2001 ER RAI referenced in GANE's Basis Statement for this contention. However, GANE did not identify, and is hereby requested to identify, the specific ER RAI Response referenced by GANE.

INTERROGATORY NO. 6.39 GANE stated in response to INTERROGATORY NO. 6.26 that it did not agree with DCS's response to the June 21, 2001 CAR RAI



referenced in GANE's Basis Statement for this contention. However, GANE did not identify, and is hereby requested to identify, the specific CAR RAI Response referenced by GANE.

INTERROGATORY NO. 6.40 In response to INTERROGATORY NO. 6.33, GANE states that Dr. Lyman can make the MACCS2 calculation input files available. That response does not identify, and GANE is hereby again requested to identify, the assumptions used in the calculations, and the results of the calculation.

INTERROGATORY NO. 6.41 In response to INTERROGATORY NO 6.3, GANE stated "DCS has not done what GANE called for in its contention, which is to provide a definition of the conditions for each accident sequence that the HEPA filters may experience, and a demonstration that they will retain their function."

- (a) Are the "conditions...that the HEPA filters may experience" referred to tabulated in Tables F-5 and F-6 in NUREG-6410? If not, define what "conditions" GANE is referring to.
- (b) Is the "demonstration that they will retain their function" equivalent to showing (1) the HEPA filter is not structurally damaged for the parameter values in "each accident sequence" by showing the parameter values in the accident are less than the damage threshold values in table F-5 of NUREG-6410 and by showing (2) the penetration of each filter is less than 1% (99% efficiency) from a comparison of the parameters in Table F-6 of NUREG-6410? If not, describe what constitutes a "demonstration."

INTERROGATORY NO. 6.42 In response to INTERROGATORY NO 6.5, GANE stated "GANE does not have sufficient information with which to respond to this interrogatory."

- (a) Are the specific values of the parameters listed in Table F-5 of NUREG-6410 "sufficient" to respond to that Interrogatory? If not, describe what "information" GANE needs to respond to that Interrogatory.

- (b) Does GANE agree that Table F-5 of NUREG-6410 lists the threshold values of differential pressure required to structurally damage the standard HEPA filter for the parameters listed? If not, explain why GANE disagrees.

INTERROGATORY NO. 6.43 In response to INTERROGATORY NO 6.6, GANE stated "GANE does not have sufficient information with which to respond to this interrogatory."

- (a) What is the "sufficient information" that GANE needs to answer that Interrogatory?
- (b) Does GANE agree that Table F-3 of NUREG-6410 shows that standard HEPA filters exposed to temperatures less than 200°C (392°F) will not affect the HEPA filter efficiency? If not, what does GANE believe the "0.0 percent" that corresponds to 200°C (392°F) in Table F-3 means?

INTERROGATORY NO. 6.44 In response to INTERROGATORY NO 6.7, GANE stated "GANE does not have sufficient information with which to respond to this interrogatory."

- (a) What is the "sufficient information" that GANE needs to answer that Interrogatory?
- (b) Does GANE agree that Table F-5 of NUREG-6410 shows that 10 inches of water is the lowest threshold value of differential pressure for a standard HEPA filter that will cause structural damage to the standard HEPA filter for the parameters (except chemical) listed in Table F-5? If not, explain why GANE disagrees.

INTERROGATORY NO. 6.45 In response to INTERROGATORY NO 6.8, GANE stated "GANE does not have sufficient information with which to respond to this interrogatory."

- (a) What is the "sufficient information" that GANE needs to answer that Interrogatory?
- (b) Does GANE agree with the following statement from NUREG-6410, Section F.2.1.3: "If a series of HEPA filters is protected by pre-filters,

sprinklers, and demisters, efficiencies of 99.9 percent for the first filter and 99.8% for all subsequent filters is recommended for accident analysis.” If not, explain why.

INTERROGATORY NO. 6.46 In response to INTERROGATORY NO 6.9, GANE stated “GANE does not have sufficient information with which to respond to this interrogatory.” What is the “sufficient information” that GANE needs to answer that Interrogatory?

INTERROGATORY NO. 6.47 In response to INTERROGATORY NO 6.10, GANE stated “GANE does not have sufficient information with which to respond to this interrogatory.” What is the “sufficient information” that GANE needs to answer that Interrogatory?

INTERROGATORY NO. 6.48 In response to INTERROGATORY NO 6.12, GANE stated “GANE does not have sufficient information with which to respond to this interrogatory.” What is the “sufficient information” that GANE needs to answer that Interrogatory?

**E. GANE Contention 9 (Cost Comparison)**

INTERROGATORY NO. 9.7 In light of the information provided by DCS in the revised ER and the information provided by the NRC Staff in the updated Hearing File, identify and fully explain all economic (monetary) costs GANE believes are still missing from the ER.

INTERROGATORY NO. 9.8 With respect to each item listed in GANE’s response to INTERROGATORY NO. 9.7, identify and fully explain why GANE believes the “rule of reason” under the National Environmental Policy Act requires inclusion of these costs.

INTERROGATORY NO. 9.9

For purposes of compliance with 10 CFR

§ 51.45(c), does GANE agree that discussions of economic (monetary) costs can be qualitative rather than quantitative? If not, identify the regulatory, scientific, technical, legal, and any other bases on which GANE bases its response.

INTERROGATORY NO. 9.10

GANE's response to INTERROGATORY NO. 9.2

states, "the National Environmental Policy Act requires the evaluation of all reasonably foreseeable environmental impacts." Does GANE believe that the economic cost associated with an impact must be evaluated regardless of the probability or likelihood of occurrence of the impact? If not, quantify the probability, or if not possible, qualitatively describe the likelihood below which GANE believes each of the impacts identified in response to INTERROGATORY NO. 9.7 need not be considered under NEPA.

F. **GANE Contention 11 & BREDL Contention 1E (Aqueous Polishing Waste Stream)**

These contentions have been consolidated into Contention 11. By letter to the ASLB and the parties dated January 18, 2002, GANE and BREDL designated GANE as the lead party on consolidated Contention 11. As a result, separate responses by both GANE and BREDL to the following interrogatories are not necessary, unless BREDL does not concur with and adopt GANE's response. In such cases, if any, BREDL should provide its own separate responses to the following interrogatories.

INTERROGATORY NO. 11.8

In INTERROGATORY NO. 11.1, DCS asked

GANE to identify and fully explain why GANE contends that the ER "understates the impacts of the waste stream from aqueous polishing to remove gallium." GANE's response was comprised of four components, the first of which was "that in the space of less than two years the liquid waste stream figures changed from 0 gallons of waste from

a dry ARIES process to 80,000 gallons from aqueous polishing...” This first component does not explain how the ER “understates the impacts of the waste stream from aqueous polishing to remove gallium.” Please identify and fully explain how GANE’s first component of its response supports the statement that the ER “understates the impacts of the waste stream from aqueous polishing to remove gallium.”

INTERROGATORY NO. 11.9      The second component of GANE’s response to INTERROGATORY NO. 11.1 was the “lack of verifiable data from the MELOX factory which is experiencing problems with a greater-than-anticipated amount of scrap to be re-processed (see attachment #9);...” This second component does not explain how the ER “understates the impacts of the waste stream from aqueous polishing to remove gallium.” especially since the MELOX plant does not employ aqueous polishing. Please identify and fully explain how GANE’s second component of its response supports the statement that the ER “understates the impacts of the waste stream from aqueous polishing to remove gallium.”

INTERROGATORY NO. 11.10      The third component of GANE’s response to INTERROGATORY NO. 11.1 was “the use of different units of measurement to describe the waste stream...” This third component does not explain how the ER “understates the impacts of the waste stream from aqueous polishing to remove gallium” because, although it is true that waste may be measured in units of radioactivity (Curies), mass (kilograms), or volume (gallons), the choice of reporting units does not demonstrate an understating of impacts. Please identify and fully explain how GANE’s third component of its response supports the statement that the ER “understates the impacts of the waste stream from aqueous polishing to remove gallium.”

INTERROGATORY NO. 11.11 The fourth component of GANE's response to INTERROGATORY NO. 11.1 was "the waste figures are likely to change dramatically, again, when DCS and DOE characterize the waste stream from the junk plutonium that has been added to the MOX program." Please identify and fully explain how GANE's fourth component of its response supports the statement that the ER "understates the impacts of the waste stream from aqueous polishing to remove gallium."

INTERROGATORY NO. 11.12 GANE's response to INTERROGATORY NO 11.1 included a statement that referred to "scrap" at the MELOX facility and referenced a paper authored by WISE-Paris, included as Attachment #9 to GANE's original contentions. Please clarify GANE's understanding of the definition(s) of "scrap" as the term is used in Contention 11, Attachment #9 to GANE's Contentions, and GANE's response to INTERROGATORY NO. 11.1. Cite to any authority.

INTERROGATORY NO. 11.13 Does GANE agree that the revised ER moots that portion of Contention 11 regarding the environmental impacts of high alpha waste storage at the SRS F-Area tank farm, since the ER outlines a plan to solidify the high alpha waste rather than place it in the SRS high-level radioactive waste tanks. If not, fully explain your answer.

INTERROGATORY NO. 11.14 In response to INTERROGATORY NO 11.2, GANE stated, "...GANE must rely on persistent allegations of egregious environmental pollution from COGEMA's European facilities, specifically La Hague which has a practice of dumping liquid waste into the North Atlantic Ocean."

- (a) Assuming that such liquid discharge is occurring, does GANE believe that the alleged environmental pollution is inherent in the design of the aqueous polishing process? If so, please provide the source of GANE's

scientific or engineering evaluation that the alleged pollution is inherent in the design of the aqueous polishing process.

- (b) Assuming that such liquid discharge is occurring, does GANE believe that the alleged environmental pollution from La Hague is allowed by regulation, permit, rule, or order? Please explain your answer.
- (c) Provide GANE's regulatory basis for believing that NRC-imposed discharge limitations would likewise result in similar "egregious environmental pollution."

Dated: December 6, 2002

DUKE COGEMA STONE & WEBSTER



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Fabrication Facility)	)	
	)	

**CERTIFICATE OF SERVICE**

I hereby certify that copies of "Duke Cogema Stone & Webster's Second Set of Interrogatories to Georgians Against Nuclear Energy and Blue Ridge Environmental Defense League" were served this day upon the persons listed below, by both e-mail and United States Postal Service, first class mail.

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