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April 17, 1999

Office of the Secretary  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

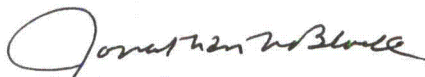
RE: Yankee Atomic Electric Company  
License Termination Plan  
Docket no. 50-029-LA-R  
(ASLBP No. 99-754-01-LA-R)

Dear Sir:

Enclosed for filing in the above referenced matter, please find an original and two conformed copies of New England Coalition on Nuclear Pollution's First Set of Interrogatories and Requests to Produce, and a certificate of service for same.

Thank you for your kind assistance in this matter.

Sincerely,



Jonathan M. Block  
Attorney for New England Coalition on Nuclear Pollution

JMB:jmb  
Enclosures

cc: Service List

SECY-035

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April 17, 1999

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Thomas G. Dignan, Jr., Esq.  
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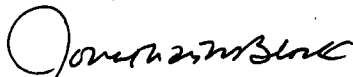
RE: Yankee Atomic Electric Company  
License Termination Plan  
Docket no. 50-029-LA-R  
(ASLBP No. 99-754-01-LA-R)

Dear Tom and Bob:

Enclosed are New England Coalition on Nuclear Pollution's First Set of Interrogatories and Requests to and a certificate of service in the above referenced matter.

We look forward to your cooperation in getting through the discovery process.

Sincerely,



Jonathan M. Block

Attorney for New England Coalition on Nuclear Pollution

JMB:jmb

Enclosures  
cc: Service List

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
Before the  
ATOMIC SAFETY AND LICENSING BOARD

Administrative Judges:  
Charles Bechhoefer, Chairman  
Dr. Thomas S. Elleman  
Thomas D. Murphy

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USMRC

'99 APR 23 A11:00

OFFICE OF THE  
FEDERAL  
ADJUDICATOR GENERAL

In the Matter of

YANKEE ATOMIC ELECTRIC COMPANY  
(Yankee Nuclear Power Station)

License Termination Plan

Docket No. 50-029-LA-R

ASLBP No. 99-754-01-LA-R

**NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S FIRST SET OF  
INTERROGATORIES AND REQUESTS TO PRODUCE  
SERVED UPON YANKEE ATOMIC ELECTRIC COMPANY**

Please apply the General Instructions below to all of the New England Coalition on Nuclear Pollution's ("NECNP's") interrogatories and requests to produce in this proceeding. At each round of discovery, please provide a set of answers and documents to each of the following persons:

Jonathan M. Block, Attorney at Law  
94 Main Street  
P.O. Box 566  
Putney, VT 05346  
(802) 387-2646

Dr. Marvin Resnikoff  
Radioactive Waste Mgt. Associates  
526 W. 26th Street Room 517  
New York, NY 10010  
(212) 620-0526

**I. GENERAL INSTRUCTIONS**

**A. DEFINITIONS**

For purposes of these interrogatories and requests to produce, the following definitions apply:

U.S. NUCLEAR REGULATORY COMMISSION  
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1. “YAEC” or “Company” means the Yankee Atomic Electric Company and its parent companies and subsidiaries (both fully and partially owned), operating companies and affiliates, and the present and former employees (including officers and directors), present and former agents, present and former contractors, present and former consultants, and other representatives of the named companies, or any other person who has in the past or is now acting or purporting to act on their behalf.

2. “Affiliate” of a specified company means (a) any person that directly or indirectly owns, controls or holds with power to vote five percent or more of the outstanding voting securities of each specified company, and (b) any company five percent or more of whose outstanding voting securities are owned, controlled, or held with power to vote, directly or indirectly by such specified company. “Affiliate” also means a legal entity that is associated with another legal entity by common ownership, either directly or indirectly, in whole or in part.

3. “NRC” or “Staff” or the “Commission” means the U.S. Nuclear Regulatory Commission, or its predecessor (the Atomic Energy Commission), or any panel, body, employee, contractor or subcontractor of such Commission.

4. “LTP” means the License Termination Plan at issue in this proceeding, any and all versions of that plan, all of which are considered to include under the use of “LTP” every portion of the plan, including the Final Site Survey Plan.

5. “Person” refers to, without limiting the generality of its meaning,

every natural person, corporation, partnership, association (whether formally organized or *ad hoc*), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency, or any other group or other organization.

6. The term “document” shall include, without limitation, all writings and records of every type in the Company's possession, control, or custody, whether or not the original is within the Company's control, custody or possession, including but not limited to the following items, whether printed or reproduced by any process, or written or produced by hand, and whether or not claimed to be privileged or otherwise excludable from discovery: notes; letters; correspondence; communications; telegrams, “faxes” and telecopy communications; memoranda; summaries and records of telephonic and telegraphic communications; summaries and records of personal conversations; diaries; appointment books; reports (including any and all draft, preliminary, intermediate, and final reports); surveys; studies (including, but not limited to, load flow, engineering, general economic, and market studies); comparisons; tabulations; budgets, work papers; charts; plans; maps; drawings; engineering and other diagrams (including “one-line” diagrams); photographs; film; microfilm; microfiche; tape and other mechanical and electrical audio and video recordings; computer programs, data files, tapes, inputs, outputs, and printouts; data compilations; “e-mail” communications; log sheets; ledgers; vouchers; accounting statements; books; pamphlets; bulletins; minutes and records of corporate and other meetings; transcripts; stenographic records; testimony and exhibits,



including work papers; copies, reports, and summaries of interviews and speeches; reports and summaries of investigations; opinions and reports of negotiations; press releases; newspaper clippings; drafts and revisions of drafts of documents; and any and all other records, written, electrical, mechanical, and otherwise.

“Document” also means every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the originals or any other copy, and all attachments or appendices to any documents; and all written, typed or printed material of any kind, and material in any other medium used for preservation, duplication, or recording written or spoken words, or data or information.

7. “Relating to,” “regarding,” “concerning,” and similar terms and phrases, when used with reference to a specified event or subject, shall mean to consist of; refer to, reflect, allude to, respond to, describe, explain, criticize, support, undermine, refute, contradict, record, report, comprise, discuss, underlie, comment upon, form the basis for, analyze, mention, or to be logically or casually connected with that event or subject. Requests concerning a subject or item should be understood to include possible or contemplated actions as to such subject or item. For example, a request for documents relating to interconnection plans would include documents relating to interconnection arrangements that have been considered but rejected.

8. “Provide the basis” means provide all information relied upon by the author(s) of any and all answers (or the witness) in support of the position, conclusion,



*etc.*, and provide all documents which support, tend to support, refute or tend to refute the proposition.

9. The term “communications” includes all verbal and written communications of every kind, including but not limited to telephone calls, e-mail, conferences, and correspondence, and all memoranda concerning the requested communications. Where a communication that is requested is not in writing, provide copies of all memoranda and documents made relating to the requested communication and identify (*see* Definition 10 below) the communication to the extent that it is not identified in the memoranda and documents provided.

10. “Identification,” “identify,” and “identity” mean:

- When used with respect to a document, stating the nature of the document (*e.g.*, letter, memorandum, corporate minutes); the date, if any, appearing thereon; the title of the document; the general subject matter of the document; the identity of the person(s) who authored the document; the identity of each person to whom the document was addressed or distributed; and (if a copy of the document has not been produced) the location of the document. Identification of a document includes identifying all documents known or believed to exist regardless of the person who has, or is believed to have possession of; custody of; or control over a document.
- When used with respect to a person, stating his or her full name; his or her most recent known business address; his or her present title and position; and his or her present and prior connections or associations with the Company.
- When used with respect to a communication, (a) stating the date, place, and circumstances of the communication; (b) identifying each party to the communication and each person who was present when it was made; (c) and stating the substance of the communication in detail.

11. "Please provide copies..." also means to provide identification (*see* Definition No. 10) for each document produced to the extent that the requested identification is not shown on the face of the document.

12. "Work paper" includes any document, as defined above, which was used, reviewed or relied upon by the witness in preparing his testimony and exhibits.

13. Common sense, accepted English language usage and established trade usage are to govern the interpretation of these requests. All dates are to be understood as though they were preceded by the phrase "on or about." The terms "and" and "or" shall be construed both disjunctively and conjunctively, the singular shall be deemed to include the plural and *vice versa*, and the use of a verb in any tense shall be construed as the use of that verb in all other tenses, all as necessary to bring within the scope of these requests all matters which might otherwise be construed to be outside their scope.

**B. INSTRUCTIONS FOR RESPONDING**

1. All answers to these interrogatories and requests to produce should be submitted separately and fully in writing under oath by the preparer or person under whose direct supervision the response was prepared. Each answer to a particular interrogatory and request to produce should identify the preparer or person under whose direct supervision the response was prepared.

2. Where an interrogatory or request to produce has a number of

separate subparts or related parts or portions, a complete response is required to each subpart or portion. In producing documents responsive to these requests, identify by part or sub-part the request to which each produced document is responsive. If a document is responsive to more than one request, each request to which it is responsive should be identified.

3. If an interrogatory plainly seeks a narrative answer in response rather than the production of documents, an answer is required (supplemented, if need be, by the production of documents). The production of documents alone in response to such a request will not suffice.

4. In producing documents responsive to these requests, identify the person(s) capable of providing testimony relating to the subject matter, preparation, purpose, and/or contents of each document and/or any notations on the document.

5. Supply written or documentary responses as they become available and do not wait to complete all responses before shipping.

6. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the interrogatory or document request.

7. Documents not otherwise responsive to this request should be produced if such documents mention, discuss, or refer to, or explain the documents which are called for by this request or if such documents are attached to documents called for by

this request and constitute routing slips, transmittal memoranda or letters, comments, evaluations, or similar materials.

8. Each response should be furnished on a separate page headed by the individual data request being answered. Individual responses of more than one page should be stapled or bound and each page consecutively numbered. Documents attached to each other should not be separated.

9. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the period designated in the request or which relate to such designated period, whether prepared before, during or after that period.

10. If an interrogatory or document request seeks information by year or years, indicate whether the information is provided on a calendar-year or fiscal-year basis. If provided on a fiscal-year basis, state the dates on which the fiscal year begins and ends.

11. Document(s) produced from files that have names, labels or other identification shall be produced by file and in the order in which the originals are found in the files, together with a cover sheet or other marking sufficient for the recipient to know the name, label and any other identification of the file from which the document(s) are produced. Document(s) produced from sources other than files shall be identified as to source and subject matter and shall be produced as kept in the ordinary course of

business. Documents should be produced in such fashion as to identify the department, branch, or office of the Company in whose possession each document was located, and, where applicable, the natural person in whose possession it was found, and the business address of each document custodian(s).

12. For each computer-generated document produced or identified in a response, state separately (a) what types of data, files, or tapes are included in the input and the source thereof; (b) the form of the data which constitutes machine input (*e.g.*, disks, punch cards, tapes), (c) a description of the recordation system employed (including program description, flow charts, *etc.*), and (d) the identity of the person(s) in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.

13. In responding to all document requests in which voluminous computer-generated data is requested, please provide the data in hard copy and in computer-readable form (preferred format: 3.5" diskette, PC compatible, ASCII).

14. Where written responses to interrogatories and document requests are created using an electronic format, such as on diskette or computer hard drive using word processing software, please provide the written response in electronic format (*e.g.*, on diskette; preferred format Word 6.0 --or higher-- for Windows) as well as hard copy.

15. If an interrogatory or document request can be answered in whole or in part by reference to the response to another interrogatory or document request served

in this proceeding, it is sufficient to so indicate by specifying the other interrogatory or document request by participant and number, by specifying the parts of the other response which are responsive to the instant interrogatory or document request, and by specifying whether the response is a full or partial response to the instant interrogatory or document request. If it constitutes a partial response, the balance of the instant interrogatory or document request must be answered.

16. If YAEC cannot answer an interrogatory or document request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the interrogatory or document request in full, and state what information or knowledge the Company has concerning the unanswered portions.

17. If no document is responsive to a data request which calls for a document, then so state. In each such instance the data request should be treated as an interrogatory.

18. If, in answering any of these requests, you consider that any request or definition or instruction applicable thereto is ambiguous, set forth the language you consider ambiguous and the interpretation you are using in responding to the request.

19. If YAEC or any person preparing an answer to a particular interrogatory or document request on the Company's behalf knows from present recollection, or discovers during the course of preparing any response, that there exists a

document which was once in the custody or control of YAEC and is relevant to this request, but is no longer in the Company's possession, custody or control, the document should be described in as much detail as possible. This request is understood to require the identification of documents obviously missing when the search is conducted. In addition to any other information deemed necessary by YAEC to fully identify the missing document, YAEC shall state whether the document at issue is:

- a. missing or lost,
- b. destroyed,
- c. transferred voluntarily to others, or
- d. otherwise disposed of.

In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing same, and the date(s) of such direction or authorization. Identify each such document by listing its author and addressee, type (*e.g.*, letter, memorandum, telegram, chart, photographs, *etc.*), date, subject matter, present location(s) and custodian(s) and their relationship, contractual or otherwise, with YAEC and state whether the document (or a copy) is still in existence.

### **C. DUTY TO SUPPLEMENT**

1. These data requests are continuing in nature consistent with the Commission's Rules of Practice and Procedure. Updated responses are required as to information or documents not now in the possession, custody or control of YAEC which



are responsive to these interrogatories and document requests, if and when such information and documents come within the Company's possession, custody or control.

2. All responses to an interrogatory or document request must be amended when YAEC, or any person answering the particular data request on YAEC's behalf, obtains information upon the basis of which (a) YAEC or the person knows that the response was incorrect when made, or (b) YAEC or the person knows that the response, though correct when made, is no longer true or is misleading.

**D. PROCEDURE IN CASE OF OBJECTION**

In the event that YAEC objects to any data request contained herein, YAEC is instructed to provide in writing, within five (5) business days of YAEC's receipt of the data requests, a statement of the basis for YAEC's objection, in sufficient detail to permit NECNP, the Presiding Administrative Law Judge, and the Commission to determine the merits of YAEC's objection. To the extent that the objection is only to a portion of a data request, YAEC should clearly state the portion to which it objects, and respond to the remaining unobjectionable portion of the data request pursuant to the instructions contained herein.

**E. PRIVILEGED DOCUMENTS**

For each document that is responsive to a data request but is withheld on a claim of privilege, provide the following information:

1. The name of each author;
2. The name of each recipient;
3. The name of each person who has seen or had access to the document;
4. For each person identified above, his or her title or position with YAEC at the time or times he or she authored, received, saw or had access to the document;
5. For each person identified above who was not a YAEC employee during the relevant time period, the name of his or her employer, and his or her relationship to YAEC at the time or times that he or she authored, received, saw or had access to the document;
6. The type of document (*e.g.*, letter, memorandum, report);
7. The date of the document;
8. A brief description of the subject matter; and
9. A list of each and every privilege claimed.

NECNP does not desire to impose an unreasonable burden on YAEC and if our requests would require the production of voluminous documents which, in your view, are not relevant or material to this case, please contact us so that we can discuss the matter and resolve it in a mutually acceptable fashion. Furthermore, if any interrogatory or request to produce, definition, or instruction appears to be unclear or ambiguous, please contact the undersigned to obtain an explanation or clarification.

**II. NECNP'S FIRST SET OF INTERROGATORIES.**

**NECNP1-I-1** In terms of the methodologies you have developed to account for subsoil contamination, please describe how you have accounted for: (a) the total volumes of contaminated soil, sludge, slag, or on-site burials present, (b) estimated total curie counts for each source of contamination, (c) radionuclide inventory of each source of contamination. Please identify any and all documents and communications concerning this accounting and provide the basis for such accounting. Please identify any and all persons involved in making such documents and communications, and a summary of their opinions and conclusions and the bases for same.

**NECNP1-I-2** Please identify all persons who participated in preparing and reviewing the LTP (in original and successive revisions) prior to filing (and after receiving comments from) the NRC, including any and all YAEC employees, contractors, subcontractors, managers, Board members, agents, attorneys, or others. Please identify what portion or portions of the LTP each person prepared or reviewed, summarize any opinion or comments each person provided in documents and communications, provide the basis for any conclusions they reached, and list (by in-house identifying numbers or codes and titles) any documents and communications such persons may have made or caused to be made as a result of their work preparing and/or reviewing the LTP. Also, identify any and all NRC employees, contractors or subcontractors, federal, state, or local agencies and their employees, contractors or subcontractors, or

public officials who reviewed and/or participated in any way, directly or indirectly, in the preparation of the LTP by comment, communication, consultation, document, or in any other way. Please describe how such persons participated, directly or indirectly, in the preparation and/or reviewing process, what each contributed, a summary of any conclusions or opinions such persons arrived at, and, so far as it is known to you, the basis for such opinions and conclusions, and identify any documents or communication such persons created.

**NECNP1-I-3**

Please identify all forms of regulatory relief (from the NRC or any other agency of federal, state, or local government), including (but not limited to) exemptions from regulatory requirements, YAEC anticipates will follow upon approval of the LTP, and any and all documents and communication concerning this anticipated relief, and the basis for anticipating that such relief will be forthcoming.

**NECNP1-I-4**

Please identify any and all persons known to you to have knowledge of the hydrogeology of the Yankee Nuclear Power Station site and surrounding area, including YAEC employees (past and present), as well as contractors, subcontractors, consultants, and other persons. For each person identified, please list any and all documents and communications on the hydrogeology of the Yankee Nuclear Power Station site and surrounding area such person produced, the dates the document and communication was made, the title of the document, and any in-house identifying number or codes. If the findings contained in such documents and communications were utilized in

preparing the LTP (or any related documents and communications) and developing methodologies for dealing with the actual or potential flow of subsurface contamination, please identify which findings were used at which places in the LTP and how such findings were incorporated into any estimations or calculations contained in the LTP, and the basis for any opinions and conclusions drawn from such findings and calculations. If YAEC rejected, changed, substituted, or otherwise rationalized not utilizing findings in any such studies, please explain the circumstances and reasons for rejecting, changing, substituting any such findings with others, identify the scientific basis for the choices made, and identifying the documents in which will be found any rejections, changes, substitutions, and rationalization of such findings.

**NECNP1-I-5**

Please identify any and all persons who YAEC has interviewed or consulted with on a so-called "exit interview" basis, including but not limited to past and present employees (contractors, subcontractors) of YAEC (or any other persons such as, but not limited to, those charged with health physics duties, radio-assays, radioactive materials handling, packaging or disposal of radioactive waste, and those persons charged with inventorying said materials), to determine where on-site land burials, spills, contaminations, and/or off-site removal, relocation, or migration of radioactive waste (at any level of radioactivity at all) may have taken place (exclusive of those materials shipped to site specifically and primarily licensed for the disposal of radioactive materials). Please also identify any and all documents and communications concerned with such

interviews or consultations, and summarize the opinions or conclusions drawn from such interviews and the documents containing such opinions and conclusions, as well as providing the basis of such opinions and conclusions.

**NECNP1-I-6**

Please identify any and all guidance documents and communications utilized or prepared in connection with the preparation and review of the LTP, including identification of any and all such persons concerned with the preparation of such documents and communications. In particular, please identify any and all such documents and communications concerned with groundwater pathways, subsurface contamination, distinguishing background radiation from radiation added to the site by operational (and decommissioning) activities, detection of alpha-emitters on site, and the selection of an appropriate scenario for the critical group likely to utilize the site after final release. Also, please identify the basis for any opinions or conclusions reached in such documents and communications.

**NECNP1-I-7**

Please identify all internal documents and communications relating to land burial of radioactive waste as authorized under former 10 C.F.R. §§ 20.201, 20.302, 20.304, and 20.401. Please summarize

the contents of such documents and communications, and provide the basis for any opinions or conclusions contained therein.

**NECNP1-I-8**

Please identify any documents and communications YAEC has produced concerning the differentiation of background radiation from radiation contributed by operation (and decommissioning) of the Yankee Nuclear Power Station. In particular, please identify any and all documents and communications concerning the development of methodologies for differentiating between these two contributors to any measurable radioactivity on site. Please summarize the contents of the documents and communications, and provide basis for opinions or conclusions contained therein.

**NECNP1-I-9**

Please identify any documents and communications YAEC has produced concerning the detection of alpha-emitting radioactive sources on site. In particular, please identify any and all documents and communications concerning the development of methodologies for detecting alpha-emitters, the places which will be sampled, the kind of equipment to be utilized, and all forms of independent verification YAEC plans to obtain. Please summarize the contents of such documents and communications and provide the basis for any opinions or conclusions contained therein.



**NECNP1-I-10** Please identify any documents and communications YAEC produced concerning detection of subsurface contamination and the sources of such contamination. In particular, please identify any and all documents and communications concerning the development of methodologies for detecting, measuring, and documenting subsurface contamination and the flow of such contamination, the places which will be sampled, the kind of equipment to be utilized, and any and all forms of independent verification of the results YAEC plans to obtain. Please summarize any opinions and conclusions contained in the documents and communications, and provide the basis for any opinions and conclusions contained therein.

**NECNP1-I-11** Please identify any and all Radiation Incident Reports (so called "RIRs"), and any other documents and communications which concern leaks, spills, and other contamination incidents which may have contributed to surface contamination, subsurface contamination, and the presence of alpha-emitters on site. Please also identify any documents and communications which develop methodologies to account for such contributions to surface and subsurface contamination, and the presence of alpha-emitters. Please summarize the contents of each document and

communication, and provide the basis for any opinions and conclusions expressed therein.

**NECNP1-I-12** Please identify any and all Unusual Occurrence Reports (so-called "UORs"), communications and documents which concern leaks, spills, and other contamination incidents which may have contributed to surface contamination, subsurface contamination, and the presence of alpha-emitters on site. Please also identify any documents and communications which develop methodologies to account for such contributions to subsurface contamination and alpha-emitters. Please summarize the contents of each documents and communications, and provide the basis for any opinions and conclusions expressed therein.

**NECNP1-I-13** Please identify any and all "primary" or "in-house" "radio-environmental" and/or "radio-ecological" documents and communications (including interdepartmental documents and communications, and those between staff and management and/or management and staff), and identify the persons producing such documents and communications. Please summarize the contents of such documents and communications, and provide the basis for any opinions and conclusions contained therein.

**NECNP1-I-14** Please identify any documents and communications concerning samples or studies YAEC has conducted of below ground radioactivity. Please identify the persons conducting such studies, how they were conducted, when they were conducted, where they were conducted, what kind of equipment was utilized, what results were obtained, what calculations were made, what conclusions and opinions were reached and the basis for such opinions and conclusions. Please also identify the role such studies played in developing methodologies to deal with subsurface contamination, particularly in relation to hydrogeological flow patterns, and whether such studies looked for alpha emitters, the presence (and concentration) of any alpha-emitters detected, the identification of the emitting isotopes and the method of identification, and the approximate amount and intensity of such radioisotopes (if detected). Please summarize the contents of the above described documents and communications, and provide the basis for any opinions and conclusions contained therein.

**NECNP 1-I-15** Identify any documents concerned with YAEC's studies using Subsurface Interface Radar equipment (SIR systems). Please also identify any and all documents and communications concerned with

such studies, provide a summary of such documents and communications, and describe the basis for any opinions or conclusions contained therein. Where any of the above identified documents or communications provided to hydrogeologists used by YAEC (or any other consulting experts or in-house personnel) whose bases, findings, opinions, and conclusions may have informed, supplemented or enhanced the LTP?

**NECNP1-I-16**

Please identify any documents and communications which, allowing for half-lives, authenticate isotopic field reports (which have informed the LTP or may be used to implement the LTP) in relation to effluent reports compiled and issued during reactor operation and decommissioning operations, and/or any documents authenticating isotopic field reports by comparing the resulting isotopic ratios to the ratios of such isotopes in effluent reports. Please provide a summary of such documents and communications, and provide the basis for any opinions or conclusions contained therein.

**NECNP1-I-17**

According to YAEC's methodology, certain alpha emitters are calculated to be present in proportion to measured and detected gamma-emissions and/or other gamma-emitting isotopes. With

respect to such calculations based on anticipated isotopic proportions, please identify all YAEC documents in which consideration is given to isotopic separation due to the mechanical action of environmental forces (for example, but not limited to, the action of water, sedimentation, stratification, transport, *etc.*). Please identify all documents and communications concerned with such issues. Please summarize such documents and communication, and provide the basis for opinions and conclusions expressed therein.

**NECNP1-I-18**

Please identify any documents or communications in which YAEC management personnel, Board members, or other non-engineers, non-scientists, or non-technicians reviewed the LTP. Please identify any documentation or communication concerning the methods such persons used to evaluate the LTP and the work being done in connection with it. Please identify any such management personnel, Board members, or others, the documents and communications they made, and the sections of the LTP they reviewed and/or evaluated and/or contributed to. Please provide a summary of the contents of their documents and communications in this regard as well as the basis for any of their opinions or conclusions expressed in the LTP.

**NECNP1-I-19**

Please identify any and all documents and communications concerning the so-called non-affected areas of the Yankee Nuclear Power Station site. Please also identify any documents and communications concerning so-called non-affected areas of the site in relation to calculating the background radiation contribution to total radioactivity on site, and the background radiation contribution to surface and subsurface contamination. Please summarize these documents and communications, and provide the basis for any opinions and conclusions contained therein. Given that studies of the site have described its general downward slope toward the reservoir and the river, and given that preliminary site characterization results revealed anomalous high levels of radioactivity with boring depth in a significant number of samples, as well as positive concentrations of  $^3\text{H}$  in Sherman Pond (WG-12), please identify any and all documents and communications concerning follow-up studies accounting for such anomalies. Please summarize the documents and communications containing such follow-up studies as well as providing the basis for any opinions and conclusions contained therein.

**NECNP1-I-20** How was the LTP informed by YAEC's site characterization studies? Please identify the persons contributing to this process and any documents and communications they produced. Please provide a summary of such documents and communications as well as the basis for any opinions and conclusions contained therein. Please identify any remaining site characterization issues and explain why the information they might yield is not necessary to the LTP.

**III. NECNP'S FIRST SET OF REQUESTS TO PRODUCE DOCUMENTS.**

**NECNP1-R-1** Produce any and all documents and communications identified (or requested to be identified) in NECNP's First Set of Interrogatories.

**NECNP1-R-2** Please produce any and all documents and communications YAEC created since 1995 to supplement and/or complete and/or replace the preliminary site characterizations it had done up to that time, including, but not limited to, environmental studies, evaluations, reports, site plans, and any and all material preparatory to anticipated changes to the site prior to license termination.

**NECNP1-R-3** Please produce a complete set of the so-called "UOR" and "RIR" documents and communications for the Yankee Nuclear Power Station which relate to issues of actual or potential surface and



subsurface contamination, and the presence and location of alpha-emitters on site. Please also produce any documents and communications YAEC has created concerning information related to spills, contamination incidents, on-site radioactive waste burial (at any level of activity), off-site migration of radioactive waste, off-site burial, disposal, and storage of radioactive waste (at any level of activity) within 200 miles of the site, and any examples of unplanned and/or uncontrolled releases of radioactivity, the results of same, and/or land burials of radioactive waste on or off-site as previously authorized under 10 C.F.R. §§ 20.201, 20.302, 20.304, and 20.401.

**NECNP1-R-4** Please produce any documents and communications "Robert G. Gerber, Inc." and/or "Gerber-Jacques-Whitford Consulting Engineers, Geologists, and Environmental Scientists" prepared for YAEC.

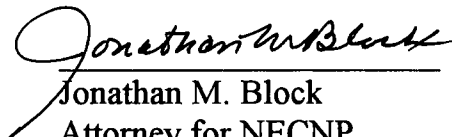
**NECNP1-R-5** Please produce any documents and communications identifying non-fuel Greater Than Class C (GTCC) radioactive waste on site including, but not limited to, debris in the fuel pool, fuel pool water, residually radioactive structures, components, and filtering or trapping systems or ion-exchange systems used to maintain the pool (to the extent it is used to hold GTCC waste, as opposed to irradiated

fuel), and any other radioactive materials (other than fuel) requiring disposal or special handling. Please also provide any documents and communications concerning plans for disposal of such waste (in contradistinction to fuel storage or removal plans) and the decontamination and clean-up of the facilities holding such waste (in contradistinction to any facilities which may be built to hold irradiated fuel on a long-term basis).

**NECNP1-R-6**

Please produce any documents and communications concerning the identification and measurement at the Yankee Nuclear Power Station site (and neighboring areas) of isotopic MCLs in groundwater samples. Please also produce any and all documents and communications concerning the translation of such measured MCLs into estimated groundwater doses (and/or TEDEs from groundwater). When providing these documents, please also identify the persons involved in preparing them.

Respectfully submitted:

  
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cc: Service List