

6-7-75

RELATED CORRESPONDENCE

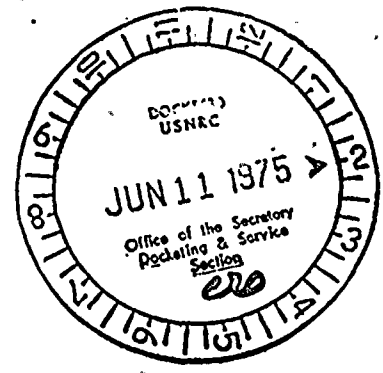
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
ARIZONA PUBLIC SERVICE)	Docket Nos. STN 50-528
COMPANY, et al.)	50-529
)	50-530
(Palo Verde Nuclear Generating)	
Station, Units 1, 2 and 3))	<u>INTERROGATORIES</u>
)	

TO: Applicant, ARIZONA PUBLIC SERVICE COMPANY, and its
attorneys, SNELL & WILMER, Arthur Gehr and Bruce Norton.

Under authority of 19 CFR § 2.750, 10 CFR 2, App. A
and the Federal Rules of Civil Procedure, Intervenor
ARIZONA CLEAN ENERGY COALITION, hereby demand that Applicant
Arizona Public Service Company (hereinafter APS) or their
attorney answer in writing and under oath and within thirty
(30) days from receipt hereof, the following interrogatories:



1. The first part of the report is a general
description of the project and its objectives.
2. The second part is a detailed description of the
methodology used in the study.
3. The third part is a description of the results
of the study.

4. The fourth part is a discussion of the
results and their implications.
5. The fifth part is a conclusion and
recommendations for future research.
6. The sixth part is a list of references.
7. The seventh part is an appendix containing
additional data and figures.

(1) List all officers and/or employees of all applicants who have duties concerning PVNGS along with a description of their PVNGS related duties, date first employed by applicant(s), date that they started PVNGS related duties, their professional and educational background, and any additional information showing their suitability for their PVNGS activities.

(2) a. List all members and/or major employees of SNELL & WILMER, or other legal representative of applicant(s), having PVNGS related duties, legal or otherwise. Answer as to interrogatory number one (1).

b. List any and all attorneys and employees of SNELL & WILMER who have any financial interest in PVNGS through stock or otherwise and list the value of that interest.

(3) Provide to ACEC for all applicants annual reports from 1968 through the latest along with the latest prospectus for all applicants having offerings for which a prospectus may have been produced. Also include for the same years a financial and statistical review.

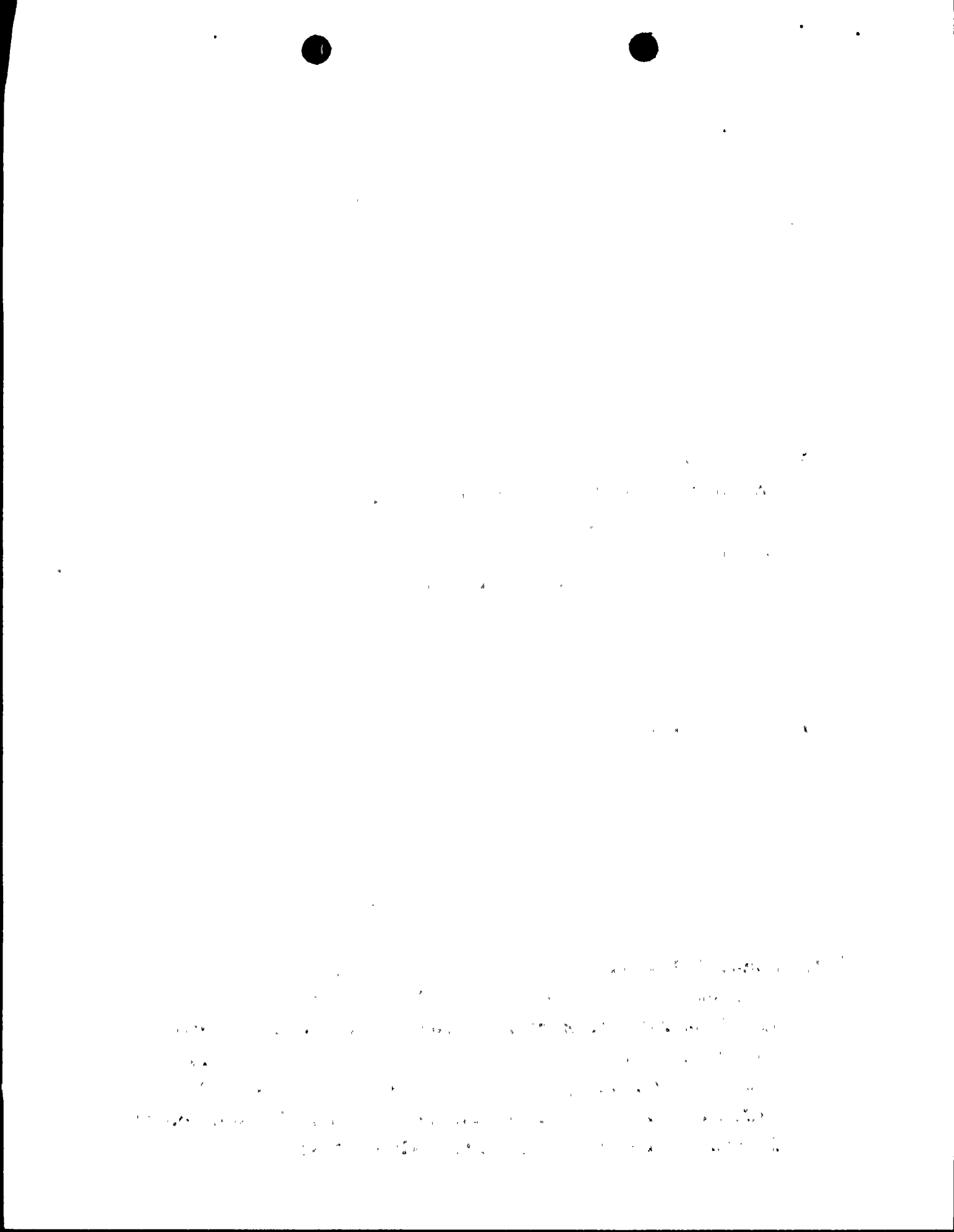
[illegible]

(4) State fully and in detail for all applicants

- (a) The total generating capacity, load factor, and peak loads
- (b) Name, type, size (design and rated capacity), fuel source, and initial start-up date for each generating station
- (c) Capacity factor and availability factor on a yearly average for 1968 through 1974 and monthly average for Jan. 1974 through March 1975 for each generating station along with the net electrical power produced by each station for each period.
- (d) All users using more than 1% of the net generating capacity for the applicant serving that user along with the size of the usage (in actual terms and percent of the service utility's capacity), rate category and whether or not the service is interruptable.
- (e) The reserve margin history from 1968 to present and the projected reserve margins for each applicant thru 1985 if each user consuming more than (i) 1.0%, and (ii) 0.5% of the net generating capacity of that applicant were placed on interruptable load service and those users loads were used as part of the reserve margin in addition to

the existing (or projected) margins with and without PVNGS. State in detail how this information was determined.

- (5) State fully and in detail, any special qualifications required by the NRC, applicants or others for work on the construction of nuclear plants.
- (6) State fully and in detail, the number of workers of each type of construction (eg. electricians, masons, welders), how many can be supplied by the state labor market and how many will have to be imported from out of state.
- (7) Discuss fully and in detail, any predicted problems that may be encountered in obtaining construction workers if all proposed nuclear plants around the country are built as planned.
- (8) State fully and in detail, all plans contracts and assurances; with the basis and details of these plans, contracts and assurances; to provide (i) fuel, (ii) used fuel disposal and the transportation of each from the supplier to PVNGS for the site of the plant.



- (9) State fully and in detail the number, type, and duration of flight of all aircraft (military and private) in the geographic airspaces within (a) 5 miles, (b) 10 miles, and (c) 25 miles of the PVNGS site on a (i) per day and (ii) per year basis and state in detail and fully how this information was determined and the basis for this information.
- (10) State fully and in detail any plans, projections, or considerations by any of the applicants or by any group in conjunction with any of the applicants for the construction of any additional nuclear generating stations in Arizona.
- (11) Please state fully and in detail what power projects the requested CAP water of 590,000 acre feet (the APS and SRP requests) will go to or are intended to go to and which projects will use what amounts.
- (12) State fully and in detail, the present and predicted groundwater recharge due to effluent discharges from the 91st AVE and 23rd AVE plants. Include the recharge in river and canal channels, and on farmland. Also include the present and predicted amount of effluent for 1975, 1980 and 1985. List all sources of information used in answering this question.

1. The purpose of this document is to provide information regarding the activities of the [redacted] and the [redacted] in the [redacted] area. This information is being provided for your information and is not to be distributed outside of your office.

2. The [redacted] and the [redacted] have been identified as being involved in the [redacted] activities. The [redacted] has been identified as being involved in the [redacted] activities.

3. The [redacted] and the [redacted] have been identified as being involved in the [redacted] activities. The [redacted] has been identified as being involved in the [redacted] activities.

4. The [redacted] and the [redacted] have been identified as being involved in the [redacted] activities. The [redacted] has been identified as being involved in the [redacted] activities. (U)

- (13) Discuss in detail, the possible impact of the possible lack of CAP water on the City of Phoenix, agricultural production on Maricopa County, and ANPP. Bear in mind the fact that ANPP would cause an additional load on an area with few or no additional water resources.
- (14) Discuss in detail the possible effects on the Applicant's ability to fund the proposed project of the lack of CAP water. Bear in mind existing APS and SRP letters of intent for approximately 600,000 acre/ft/year and the intended reliance on CAP water for proposed power projects.
- (15) State fully and in detail all facts and calculations used to conclude that there is only "an extremely remote possibility" (PSAR 2.2.3.6) of an aircraft impact.
- (16) State fully and in detail with calculations the cost of PVNGS if the design criteria were to include aircraft impact.
- (17) State fully and in detail the site selection criteria used to select the proposed plant site. List all other areas having similar characteristics. Indicate for each criteria the rating or score achieved by the proposed plant site.

1. The first part of the document is a list of names and addresses of the members of the committee.

2. The second part of the document is a list of names and addresses of the members of the committee.

3. The third part of the document is a list of names and addresses of the members of the committee.

4. The fourth part of the document is a list of names and addresses of the members of the committee.

5. The fifth part of the document is a list of names and addresses of the members of the committee.

6. The sixth part of the document is a list of names and addresses of the members of the committee.

7. The seventh part of the document is a list of names and addresses of the members of the committee.

8. The eighth part of the document is a list of names and addresses of the members of the committee.

9. The ninth part of the document is a list of names and addresses of the members of the committee.

10. The tenth part of the document is a list of names and addresses of the members of the committee.

(18) State fully and in detail the reasons for preparing each site criteria as being reasonable and sufficient to judge the site on. Give documentation in literature for each selection.

(19) As respects to the application and to your answers to interrogatories nos. 4 through 14, please state:

(a) The name, occupation, address, and telephone number of each person who will be called as a witness to testify as to the facts set forth in the application and those answers, identifying which facts each person will be testifying to.

(b) The field or science in which each such person is sufficiently schooled to enable them to express opinion evidence in this matter, if any.

(c) Whether such witness will base his opinion:
(1) in whole or in part upon facts acquired personally by that person in the course of an investigation or examination as to the facts;
or

CONFIDENTIAL - SECURITY INFORMATION (S)

1. The purpose of this document is to provide information regarding the activities of the [redacted] and the [redacted] in the [redacted] area. This information is being provided to you for your information only and should not be used for any other purpose.

2. The information contained in this document is classified as CONFIDENTIAL - SECURITY INFORMATION (S) and should be handled accordingly. It is not to be released to the public or any other person without the express written permission of the [redacted].

(ii) solely upon information provided that person by others.

(d) The qualifications of each such person that would render that person, if possible, as an expert witness.

(e) If any such witness has made a personal investigation or examination relating to any of the facts or cases set forth in the application or the answers to interrogatories nos. 4 through 14, state the date(s) and nature of each such investigation or examination.

(f) Each and every fact, and each and every document, photograph, report, item, or other tangible object supplied or made available to each such person.

(g) Whether each such person has rendered written reports, regarding facts, bases, or opinions as respects your contentions referred to in the application or interrogatories nos. 4 through 14. _____ If so, state:

(i) the date(s) of each such report;

(ii) The name and address of the custodian of each such report.

(20) List each expert witness you will call to testify in this matter.

(a) If not previously given in answers to these interrogatories, give the occupation, address, telephone number, educational background and experience (as it may relate to each person's field of expertise, if any) of each expert witness.

(b) State the subject matter on which each such expert is expected to testify.

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(2) The second source is being off

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(4) The second source is being off

(c) State the facts to which each such expert is expected to testify-

(d) State each opinion, if any, which each such expert is expected to express in testimony.

(e) Give a detailed summary of the grounds for each opinion expressed by each such expert.

(21) Is any part of the application or any of the facts and/or opinions set forth in answers to the preceding interrogatories based solely or partially on secondary sources such as articles, books, pamphlets, publications, or the like? _____ If so, please identify:

(a) which parts are based solely on such secondary sources;

(i) The secondary sources each is based on;

(11) if other than the entire secondary source, is being relied upon, identify the part or parts which are being relied upon.

(b) Which parts are based partially on such secondary sources;

(1) The secondary sources each is partially based upon;

(11) if other than the entire secondary source is being relied upon, identify the part or parts which are being relied upon.

(c) Which facts are based solely on such secondary sources;

(1) The secondary sources each such fact is based on;

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(11) if other than the entire secondary source is being relied upon, identify the part or parts which are being relied upon.

(d) Which facts are based partially on such secondary sources;

(i) The secondary sources each such fact is partially based on;

(11) if other than the entire secondary source is being relied upon, identify the part or parts which are being relied upon.

(e) Which opinions are based solely on such secondary sources;

[illegible][illegible]

(f) Which opinions are based partially on such secondary sources;

(1) The secondary sources each such opinion is partially based upon;

(11) if other than the entire secondary source is being relied upon, identify the part or parts which are being relied upon.

(22) Identify, with specificity, each and every exhibit you intend to use in this matter.

(a) As to each such exhibit, state which facts, opinions, or contentions the exhibit supports, if any.

(23) With reference to the exhibits listed in the preceding interrogatory, state the source and nature of the exhibit, i.e., whether said exhibit is documentary, a picture, or whatever; who prepared each exhibit; its date of preparation; and, who has custody of each exhibit..



THE UNITED STATES OF AMERICA

DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

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OFFICE OF THE ASSISTANT SECRETARY
FOR LAND MANAGEMENT

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NOTICE OF SERVICE OF INTERROGATORIES

Intervenor hereby give notice that non-uniform
interrogatories nos. 1-23 have been served on Applicant
APS this 7th day of June, 1975.

ARIZONA PUBLIC LAW ADVOCATES

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Attorney for Intervenor

COPY Of the foregoing
mailed this 6th day of
June, 1975, to:

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Office of the Secretary
U.S. Nuclear Regulatory Commission

