

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
PUBLIC SERVICE ELECTRIC &	)	Docket No. 50-272
GAS COMPANY	)	Proposed Issuance
	)	of Amendment to
(Salem Nuclear Generating	)	Facility Operating
Station, Unit No. 1)	)	License No. DPR-70

LICENSEE'S INTERROGATORIES TO  
MR. AND MRS. ALFRED C. COLEMAN, JR.  
(SET NO. 1)

Pursuant to 10 CFR §2.740b of the Nuclear Regulatory Commission's Rules of Practice, Licensee, Public Service Electric & Gas Company, by its attorneys, hereby propounds the following interrogatories to intervenor, Mr. and Mrs. Alfred C. Coleman, Jr., to be answered fully in writing, under oath, within fourteen (14) days after service hereof in accordance with the following definitions and instructions:

Definitions and Instructions

1. For each interrogatory identify whether answered by Mr. and Mrs. Coleman and if not answered by either, please state the full name, address, occupation, and employer of each person answering the interrogatory and designate the interrogatory, or part thereof, he or she answered.

2. The following definitions shall apply:

(a) "Intervenor" shall mean Mr. and Mrs.

Alfred C. Coleman, Jr.

- (b) "Person" shall mean an individual, person, corporation, proprietorship, partnership, or any other entity.
- (c) "Identification" or "identity," when referring to an individual, corporation, or other entity, shall mean that the intervenor shall set forth the name, present or last known address, and if a corporation or other entity, its principal place of business or if an individual his or her title or titles and by whom employed. Once an individual, corporation, or other entity has been thus identified in answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation or other entity to state merely his, her or its name.
- (d) "Description" or "describe" when referring to a document as hereinafter defined, shall mean that intervenor shall set forth the author or originator, addressee(s), date, title and subject matter, the present custodian of the original thereof and, if known, the present custodian of any copy thereof and the last known address of each such custodian. In lieu of describing the document, intervenor

may attach a copy thereof to its answers, indicating the question to which the attached document is intended to be responsive. If the information requested in this paragraph does not appear on the face of such attached document, then intervenor shall indicate that information for each document so attached.

(e) "Document" shall mean any written, printed, typed or any other graphic matter of any kind or nature, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of intervenor, or its officials, employees, or agents; it shall also mean all copies of documents by whatsoever means made.

(f) "Date" shall mean exact day, month and year if ascertainable, or, if not ascertainable, the best approximation (including relationship to other events).

3. These interrogatories request all knowledge or information in intervenor's possession and/or knowledge and information in the possession of intervenor's agents, representatives, and, unless privileged, attorneys.

4. These interrogatories apply to each of the contentions admitted as issues in controversy in this proceeding by the Atomic Safety and Licensing Board's Memo-

random and Order dated April 26, 1978. In your response to the following interrogatories, please supply the requested information, indicate which contention is being addressed and to which of the interrogatories or its subparts the response is being made.

INTERROGATORIES

1. Is the contention based on one or more calculations? If so:

(a) Describe each calculation and identify any documents setting forth such calculation.

(b) Who performed each calculation?

(c) When was each calculation performed?

(d) Describe each parameter used in such calculation and each value assigned to the parameter, and describe the source of your data.

(e) What are the results of each calculation?

(f) Explain in detail how each calculation provides a basis for the issue.

2. Is the contention based upon any type of study or analysis? If so:

(a) Describe the nature of the study or analysis and identify any documents which discuss or describe the study or analysis.

(b) Who performed the study or analysis?

(c) When and where was the study or analysis performed?

(d) Describe in detail the information that was studied or analyzed.

(e) What were the results of such study or analysis?

(f) Explain how such study or analysis provides a basis for the contention.

3. Is the contention based upon one or more documents?

If so:

(a) Identify each such document.

(b) Identify the information in each document on which the contention is based.

(c) Explain how such information provides a basis for the contention.

4. Is the contention based upon research? If so:

(a) Describe all such research and identify each document.

(b) When and where was the research conducted?

(c) By whom was the research conducted?

(d) Explain how such research provides a basis for the contention.

5. Is the contention based upon conversations, consultations, correspondence, or any other type of communications with one or more individuals? If so:

(a) Identify by name and address each such individual.

(b) State the educational and professional background of each such individual, including occupation and institutional affiliations.

(c) Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.

(d) Describe the information received from such individuals and explain how it provides a basis for the issue.

6. Please identify each and every person whom you expect to call as an expert witness at the hearing in this matter on each contention admitted by the Atomic Safety & Licensing Board as set forth in the Order Following Special Prehearing Conference dated May 24, 1978, or elsewhere, and, with respect to each person, please:

(a) State the contention or portion thereof on which he will testify;

(b) state the substance of facts and opinions to which the witness is expected to testify;

(c) give a summary of the grounds for each fact and opinion; and

(d) describe fully the witness' educational and professional background.

If no expert witnesses have been identified or you do not expect to call any expert witnesses, so indicate.

Respectfully submitted,

CONNER, MOORE & CORBER

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn". The signature is fluid and cursive, with the first name "Mark" and last name "Wetterhahn" clearly distinguishable.

Mark J. Wetterhahn  
Counsel for the Licensee

June 28, 1978