

November 12, 1979

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of )  
 )  
LOUISIANA POWER & LIGHT COMPANY ) Docket 50-382  
 )  
(Waterford Steam Electric Station, )  
Unit 3) )



APPLICANT'S FIRST INTERROGATORIES  
TO JOINT INTERVENORS

Under the terms of the September 25, 1979 Stipulation on Discovery Schedule, approved by the Licensing Board on September 28, 1979, it was agreed that first round discovery requests with respect to the contentions initially allowed by the Licensing Board would be made within 60 days of the Licensing Board's Order on contentions, dated September 12, 1979. Applicant hereby files its first interrogatories pursuant to the approved Stipulation.

Under 10 C.F.R. Section 2.740b, these interrogatories are to be answered separately and fully in writing and under oath or affirmation. Answers must be served on all parties and the Licensing Board. As agreed in the Stipulation, Intervenor has forty-five (45) days to respond to this initial request, and fifteen (15) days to file objections to any interrogatory herein.

Interrogatories on Contention 8/9

8/9-1 Specify, in detail, all publications, investigations, consultations, analyses, or surveys

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utilized as the bases of Contention 8/9. Provide complete citations of published information, as well as copies of all unpublished or otherwise unavailable written material utilized in establishing a basis of the contention for the occurrence of a cumulative and/or synergistic relationship between low-level radiation and known or suspected carcinogens in the vicinity of Waterford 3.

- 8/9-2 Provide the identity and location of persons having knowledge of discoverable matters related to Contention 8/9, and provide the identity of each person expected to be called as an expert witness at the hearing, the subject matter on which he is expected to testify, and the substance of his testimony. Note that 10 C.F.R. Section 2.740(e) requires you to seasonably supplement your response to this question to include information acquired after the time of your initial response.

Interrogatories on Contention 21

- 21-1 Indicate whether Sections 2.4.3, 2.4.10, 3.4 and 9.2.5 of the Applicant's Final Safety Analysis Report ("FSAR") "appropriately evaluate the

effects of maximum possible flood conditions" for those structures and conditions identified in 21(a) and 21(b). If not, describe in what respects evaluations contained in the identified FSAR sections are inappropriate.

21-2 For 21(c), describe a scenario of events for a maximum possible flood which would constitute "physical isolation of essential personnel in the control room in the event of a medical emergency, resulting from closure of the primary entrance way into the containment structure," describe what you consider to be the "effects" of such physical isolation and describe how these effects would threaten or adversely affect the public health and safety.

21-3 For 21(d), describe a scenario of events for a maximum possible flood which would constitute "lack of accessibility of essential personnel in the control room in the event of an emergency requiring evacuation, resulting from closure of the primary entrance way into the containment structure," describe what you consider to be the "effects" of such lack of

accessibility and describe how these effects would threaten or adversely affect the public health and safety.

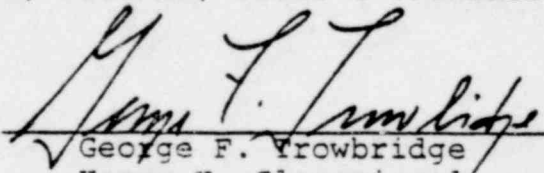
Interrogatories on Contention 23

- 23-1 Identify the specific "geologic activities" discussed in the referenced Saucier Report which are the subject of Contention 23.
- 23-2 Explain how such activities would cause external flooding of the Waterford facility.
- 23-3 Explain how such activities would threaten the structural integrity of the fuel handling building, containment structure and reactor auxiliary building.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By:

  
George F. Trowbridge  
Harry H. Glasspiegel  
Counsel for Applicants

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Dated: November 12, 1979

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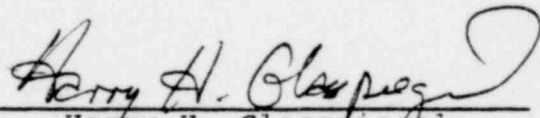
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document, entitled "Applicant's First Interrogatories to Joint Intervenor," were served by deposit in the U.S. mail, first class, postage prepaid, this 12th day of November, 1979, to those persons on the attached service list.

  
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Harry H. Glasspiegel

Dated: November 12, 1979

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