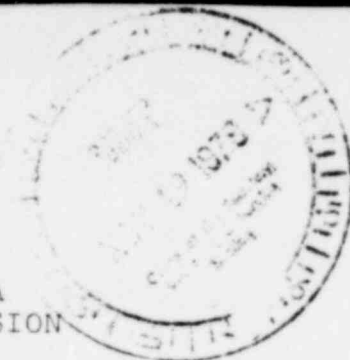


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
LOUISIANA POWER & LIGHT COMPANY) DOCKET NO. 50-382
(Waterford Steam Electric)
Station, Unit 3))

DATA REQUESTS

TO LOUISIANA POWER AND LIGHT COMPANY:

In connection with the above proceeding you are being asked to answer the interrogatories below in writing and under oath. In answering each interrogatory, state the name of the person(s) providing the information to the affiant if the information is not personally known, the location where the information can be found in the Waterford III ER or FSAR and the name of the person best qualified to testify as to the answers to the interrogatory at any hearing on this matter. All the attached interrogatories are cumulative and are to be amended when additional information becomes available to LP&L.

1. Please furnish the standards for all transmission lines serving Waterford III.
2. Will these transmission lines have a cooling system? If so, please describe in detail.
3. What is the expected operating temperatures of these transmission lines?

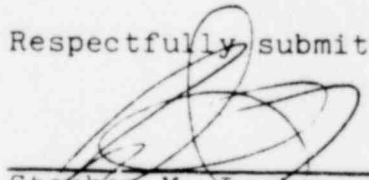
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4. What is the maximum temperature from an external source that these transmission lines can receive and reliably function?
5. Do these transmission lines undergo any change in characteristics (physical or electrical) when heated from an external source? If so, please explain.
6. Do these transmission lines have any insulation or covering which will melt or burn when exposed to heat or flame? If so, please explain including the temperatures at which these events occur.
7. At the point where these transmission lines cross the Missouri-Pacific Railroad track bed how high above the tracks will the transmission lines be? How far apart?
8. Has LP&L or any contractor thereof performed any analysis of the consequences of a railroad accident occurring under or near the transmission lines between Waterford III and the switching station which accident results in an explosion and/or fire? If so, please identify the study by title and author, if any, and state the conclusion thereof. You may comply by providing a copy of the study.
9. Has an analysis like that in number 8 above been performed for the impact of the resulting explosion and/or fire on the LP&L switching station which serves Waterford III?
10. Your response to NRC question 313.1 indicates that you own all surface rights within the exclusion area. Does LP&L own or control surface rights to that part of the Mississippi River bottom which is located in the exclusion area? If so, please explain how the ownership or control was acquired and provide a copy of any written instrument connected therewith.

11. To what extent does any existing or draft emergency plan for Waterford III prepared by LP&L, the State of Louisiana, or any other governmental body provide a means for the evacuation (used here to mean one or more designated evacuation routes and a method of transportation that can be used thereon) of persons living near Waterford III in the event of an accident?
12. What is the maximum distance from Waterford III for which a means of evacuation is provided in any existing or draft evacuation plan in number 11 above?
13. Does any evacuation plan prepared by LP&L, State of Louisiana, or any other governmental body provide a method to transport persons who are aged, infirm, or who do not own an automobile in an evacuation necessary because of an accident at Waterford III? If so, please explain.
14. Has LP&L or any contractor thereof, the State of Louisiana, or any other governmental agency evaluated the impact of a gasoline shortage on the feasibility of evacuating persons living near Waterford III? If so, please identify the study by title and author and state the results thereof. In lieu thereof, you may provide a copy of the study.

Respectfully submitted,


Stephen M. Irving
Counsel for Intervenor-
Louisiana Consumer's League,
Inc.
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Public Law Utilities Group

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Stephen M. Irving, Director
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November 13, 1979

Mr. Ernie Blake, Esq.
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Shaw, Pittman, Potts & Trowbridge
Attorneys At Law
1800 M Street, N.W.
Washington, D.C. 20036



RE: In the matter of Louisiana Power and Light Company (Waterford Steam Electric Station, Unit 3); Before the Atomic Safety & Licensing Board; Docket No. 50-382.

Dear Mr. Blake/Trowbridge:

Please find enclosed data requests in the above matter submitted by the Louisiana Consumer's League, Inc.

Sincerely,

[Signature]
Stephen M. Irving
Counsel for Intervenors-
Louisiana Consumer's League, Inc.

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Enclosure

CC: All Counsel of Record