

NRC PUBLIC DOCUMENT ~~RO~~RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
PENNSYLVANIA POWER & LIGHT COMPANY)
and)
ALLEGHENY ELECTRIC COOPERATIVE, INC.)
(Susquehanna Steam Electric Station,)
Units 1 & 2)

Docket Nos. 50-387
50-388



ENVIRONMENTAL COALITION ON NUCLEAR POWER
(ECNP) FIRST ROUND DISCOVERY REQUESTS TO
NRC STAFF, APPLICANT, AND COMMONWEALTH

Pursuant to 10 C.F.R. 2.744 and the Licensing Board's Special Prehearing Conference Order of March 7, 1979, the Environmental Coalition on Nuclear Power (ECNP), intervenors in the captioned proceeding, hereby serve upon the Executive Director for Operations, the following list of documents for production to these intervenors:

1. For ECNP Contention 1, 2, 3, 5, which refer to the cost-benefit analysis and to the various aspects of the health effects of the nuclear fuel cycle, the following documents:

ORNL-4903, Vol. 1&2
" -5315
" -TM-4154
" -TM-5251

ORNL/NUREG/TM-102

GJO-100(78) and-100(79)
GJO-11(1978)
" -1640
" -1659-1
GJT-2, -4, -6, -12, -18, -21
NUREG-0109
" -0119
" -0322
NUREG/CR-0573
NUREG/CR-0574

NUREG/CR-0311
NUREG/CR-0597
NUREG/CR-0114
NUREG/CR-0649
NUREG-0456

CONF- 720805
CONF-730907
MIT-952-5

FBDU-218-1
FBDU-224-10

USGS Professional Paper 820
" Open File Report 78-1050

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ERDA-93
BNWL-2190
NIOSH-75-117
UCRL-50163 (1968)

"Reserves and Resources of Uranium", Supplement to Mineral Resources and the Environment Nat. Acad. Sci., 1975

"President's Report on Occupational Safety and Health", 1972

Bureau of Mines Publ. RI 8254

Draft Report of Task Force on Uranium Mill Tailings, Argonne National Labs., 1976

"Monticello Mill Tailings Erosion Control Project: Monticello, Utah," Report and Supplemental Report, USAEC, 1966

USPHS Tech. Report W62-19 (1962)

Jan., 1979, Draft Report of NCRP Sci. Comm. 40

Copy of the NRC Translation of a report by Dieter Teutel of the University of Heidelberg

And also supply:

1. All assumptions, references, and calculations used in arriving at the radon-daughter air-concentration to dose to the bronchial epithelium of 0.625 mrem/pci m³ in NUREG-0511, Vol. II, p. G-44. Cite all references.
2. All calculations, assumptions, with references cited, used in cost-benefit analysis for Susq. l&2, with emphasis on compliance with 10 CFR 51.20(c).
3. All references in which particular values used in a cost-benefit are singled out for comparison with some parameter not used in the analysis, so as to create the illusion that the singled out parameter is insignificant and need not be included in the cost-benefit analysis. The comparison here refers to the comparison of radon-222 emissions to natural releases of radon-222 so as to obscure the health effects caused by the operation of Susquehanna l&2.

This should also include the references to justifications for, in detail, tampering with one side of the analysis balance and not the other.

4. Transcripts of each and every meeting of the NRC Commissioners, with all attachments and discussion papers, in which the quantity of radon-222 in Table S-3 is discussed, and all Staff position papers and recommendations pertaining to radon-222.

2. For ECNP Contention 6 on Evacuation, supply the following information:

1. All presently (as of May 25, 1979) applicable and proposed revisions of NRC detailed requirements for emergency response and evacuation plans to be met by Applicant, agencies of the Commonwealth, local governmental agencies, and federal agencies, including full specification of the legal responsibilities of all institutions (agencies) and personnel for
 - a. reporting of accidents,
 - b. recommendations for evacuation,
 - c. decisions to implement emergency and/or evacuation plans, and
 - d. the actual conduct of these plans.
2. All correspondence and requests for information, documentation and data pertaining to emergency preparedness and evacuation planning submitted by NRC to the Applicant, Commonwealth, and any other agencies of government or private organizations in consequence of and/or subsequent to the March 28, 1979, accident at Three Mile Island, Unit 2,
3. All correspondence and requests for information, data, and documentation pertaining to radiation monitoring submitted by NRC to the Applicant, Commonwealth, and any other agencies of government or private organizations in consequence of and/or subsequent to the March 28, 1979, accident at Three Mile Island, Unit 2.
4. All federal radiation monitoring data from Three Mile Island, Unit 2, in possession of the NRC, subsequent to March 28, 1979, in order to establish whether the NRC, or other involved federal agency, has monitored to a distance and extent to be able to establish radiation doses to the public with a reasonable degree of accuracy and timeliness, in the event of a serious radiological emergency at Susquehanna.

3. For Contention 7, referring to unresolved safety problems, supply copies of the following:

PTR-815
BNL-17608
PTR-738
WASH-1246
SAND 77-1371
NUREG/CR-0649
NUREG-140

Any reports on ATWS published subsequent to WASH-1270.

"Meteorology and Atomic Energy-1978", USAEC, TID-24190.

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The most recent report to Congress describing unresolved generic safety problems.

Those portions of the transcripts of the hearings in the Black Fox proceeding in which unresolved safety problems were discussed.

In addition, supply a description of each design basis accident, indicating in the resulting analysis, which engineered safeguards upon which reliance for safety is placed, have been tested under realistic accident conditions (temperature, pressure, full-scale test) and which are calculated to be effect through analytical technique.

4. For Contention 9, concerning decommissioning of nuclear power plants, supply copies of:
 - (a) the report of the Atomic Industrial Forum on decommissioning;
and
 - (b) any NRC reports on reactor decommissioning.

To Applicant

The following information and documents, data, and reports are requested from the Applicant:

1. For Intervenor's Contentions 1-18, supply all reports, calculations, revised information, and other responses to any requests from NRC, the Commonwealth of Pennsylvania, or any other agency of government arising out of, and/or subsequent to the March 28, 1979, accident at Three Mile Island, Unit 2.

2. For ECNP Contention 4, Need for Power, all data and calculations of Applicant's estimated electricity demand, use, and supply projections for the operating life of the reactor. Supply all bases for assumptions of all growth rates and all forecast parameters, as well as all assumptions in Appendix B1 and Appendix B2, Environmental Report, and all updated information subsequent to those reports.

3. For ECNP Contention 6, on Evacuation, supply:
 - a. Applicant's complete emergency preparedness and evacuation plans (which were not provided with the FSAR) and all subsequent modification of these documents by the Applicant, including any resulting from the TMI-2 accident of March 28, 1979.
 - b. Any calculations and the detailed bases of all assumptions used to prepare Applicant's emergency response and evacuation plans, including not readily available studies, and citations to readily available references, used in the development of those portions of the plans pertaining to:
 1. traffic studies in Luzerne and adjoining counties and elsewhere;
 2. evacuee destination planning;
 3. emergency fuel supply plans; and
 4. plans for special handling of the infirm and institutionalized persons - which together ensure conformity with Protective Action Guides and any other applicable governmental regulations.
 - c. Emergency preparedness and evacuation plans for Class 9 accidents, or any accident more serious than the Applicant's Design Basis accident.
 - d. All data and information on radiation monitoring in the vicinity of the plant requested or required by NRC, Commonwealth, or any other agency of government in consequence of and/or subsequent to the March 28, 1979, accident at Three Mile Island, Unit 2.

4. For ECNP Contention 7, supply following documents listed in the FSAR, Chap. 1.6:

APED-4986	NEDO-10174	NEDO-10958-A
APED-5458	NEDO-10299	NEDO-10959
APED-5460	NEDO-10320	NEDO-20231
APED-5652	NEDO-10329	NEDO-20340
APED-5750	NEDO-10349	NEDO-20360
APED-5756	NEDO-10527	NEDO-20360-IP
GEAP-13112	NEDO-10739	NEDO-20566
NEDE-10313	NEDO-10801	NEDO-20626
NEDE-21175-P	NEDO-10802	NEDO-20626-1
NEDM-10735	NEDO-10846	NEDO-20626-2
NEDO-10173	NEDO-10958	NEDO-20631

NEDO-20913
NEDO-20922
NEDO-20939
NEDO-20944
NEDE-20944-P
NEDO-20948-P
NEDO-21142
NEDO-21143
NEDO-21159
NEDO-26453 (all parts)

IDO-ITR-105
WACP-6065
WAPD-TM-283
WAPD-TM-416
BN-TOP-1, Rev. 1 (11-72)
BN-TOP-2, Rev. 2 (5-74)
BQ-TOP-1, Rev. 2 (1977)

and

The report authored by Dr. Charles Reed of General Electric, concerning the present and future status of BWRs with regard to, among other things, safety.

The bases for the assumptions in the "assessment of likelihood" of "rare" and "extremely rare" used in the Environmental Report (ER) Table 7.1-17 with specification as to whether these bases are factual, estimated, or speculative.

5. For ECNP Contention 9, on Decommissioning, supply all data, cost estimates, and worker exposure estimates now associated with decommissioning which have been developed by the Applicant since filing of the FSAR or subsequent to and/or in consequence of the TMI-2 accident of March 28, 1979.
6. For ECNP Contention 18, on Herbicides, supply a detailed description of Applicant's plans to maintain clearance of transmission line rights-of-way, including full information on:
 - a. Any chemical herbicides proposed to be used and a full environmental analysis thereof;
 - b. Physical or mechanical means of maintenance and their full environmental impacts; and
 - c. Detailed provisions and identification of any subcontracts and subcontractors and their plans for rights-of-way maintenance.

To Commonwealth of Pennsylvania

The Commonwealth is asked to provide Intervenor's with the following information, data, documents and reports:

1. For Intervenor's Contentions 1-18, provide all correspondence and requests for information, data or documents from the Commonwealth to the Applicant subsequent to and/or in consequence of the March 28, 1979 accident at Three Mile Island, Unit 2.
2. For ECNP Contention 6, on Evacuation, supply
 - a. The most recent version of the Commonwealth's emergency preparedness and evacuation plans;
 - b. All correspondence from, and to, the Bureau of Radiological Protection, the Pennsylvania Emergency Management Agency, the Commonwealth Justice Department, the Applicant, and NRC pertaining to the adequacy and any proposed changes in emergency preparedness and evacuation plans in consequence of and subsequent to the March 28, 1979, TMI-2 accident.
 - c. All records, documents, and other information detailing the legal responsibilities and obligations of employees of the Commonwealth with respect to their ability to respond fully, adequately, and timely to a radiological emergency at a nuclear power facility in order to protect the health and safety of the citizens of Pennsylvania.
 - d. All radiation monitoring data from Three Mile Island, Unit 2, in the possession of the Commonwealth Bureau of Radiological Protection subsequent to March 28, 1979, in order to establish whether the Commonwealth or any other involved institution or agency has monitored to a distance and extent to be able to establish radiation doses to the public with a reasonable degree of accuracy and timeliness in the event of a radiological emergency.
 - e. Emergency preparedness and evacuation plans of the Pennsylvania Emergency Management Agency and local agencies of government to provide adequately for the protection of the health and safety of the citizens of Pennsylvania in the event of a radiological accident worse than the Applicant's calculated "design basis accident," or a Class 9 accident.

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CERTIFICATE OF SERVICE

I hereby certify that copies of Environmental Coalition on Nuclear Power (ECNP) First Round Discovery Requests to NRC Staff, Applicant, and Commonwealth have been served on the following by deposit in the United States mail, first class, this 25 day of May, 1979:

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