

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD



In the Matter of)

PUGET SOUND POWER & LIGHT)
COMPANY, et al.,)

DOCKET NOS. STN 50-522
50-523

(Skagit Nuclear Power Project,)
Units 1 and 2))
-----)

INTERVENOR SCANP'S INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO PACIFIC POWER AND LIGHT COMPANY DATED
MAY 30, 1979

In accordance with 10 CFR, §2.740B and 10 CFR §2.741,
please answer the following Interrogatories and respond to
the accompanying Requests for Production.

Documents to be produced should be presented at the
offices of undersigned counsel at 9:00 a.m. June 21, 1979,
or at such other time and place as may be agreed upon.

INTERROGATORY NO. 1. With respect to the form 10-K
filed by you for the year ended December 31, 1978, please
describe all documents containing the information set forth
on page 12 pertaining to the minimum capacity of facilities
for storage of spent fuel at the Skagit site.

ANSWER:

360 031

ANSWER:

INTERROGATORY NO. 2. Has Puget retained an independent financial consultant to furnish assistance or advice in connection with financing Puget's construction program? If so, give the name, address and job title of each such consultant, and describe specifically all notes, correspondence, memoranda, studies, reports, or other documents which have been prepared by such consultant, or which have passed between Puget and such consultant. Also state whether Puget has asked such consultant to examine Puget's financial condition, and to express an opinion as to whether or not Puget can finance its construction program, in view of all pertinent factors? Also describe all documents which embody such an opinion.

ANSWER:

360 032

INTERROGATORY NO. 3. Do Puget or its consultants possess any information, not set forth or referred to in the PSAR, relating to actual or potential environmental affects of the Skagit project, including specifically the following subjects:

- a) Aquatic impacts
- b) Meteorology
- c) Geology
- d) Evacuation plan
- e) Possibilities of and consequences of accidents during operation.

If so, please describe such information, give the title and date of all documents reflecting such information, and the name and address and job title of all persons with knowledge of such information.

ANSWER:

INTERROGATORY NO. 4. Has Puget Power now or at any time in the past employed or authorized any person to engage in any of the following activities?

a) Investigation of activities, funding, or background of the individual or organizational intervenors in this proceeding.

b) Clandestine observation of the activities of the intervenors in this proceeding.

c) Payment of funds to former representative Robert Perry in connection with his services to assist in dealing with environmental groups, or any other purpose?

If so, please give full particulars, and identify all documents which reflect or resulted from such activities.

ANSWER:

INTERROGATORY NO. 5. With respect to your form 10-K for the year ending December 31, 1978, please state:

a) What are the "uncertainties in predicting the rate of load growth" referred to on Page 2? Please quantify such uncertainties, if possible, and describe all documents which describe or quantify such uncertainties.

b) With respect to what period of time does the following statement, which appears on Page 2, apply?

"The Company has sufficient firm resources to be able to meet its firm load under minimum expected water conditions."

c) How much firm power did the company sell to other utilities during each of the last five years, and how much does it anticipate selling during each of the coming five years?

d) How much non-firm power has the company sold to other utilities during each of the preceding five years, and how much does it anticipate selling to other utilities during each of the coming five years?

e) Which are the "higher-cost thermal generating plants" referred to at the top of Page 3?

f) As to what period of time is the following statement valid and applicable:

"If average water conditions prevail for a given year, the Company would annually have approximately two billion KWH of non-firm power available to displace its own thermal generation and to sell to other utilities."

g) Please account for the difference in estimated construction cost in dollars per KW reflected in the table on page 7 of your 10-K, and that value for the Skagit units set forth in the 10-K forms of Pacific Power and Light and Portland General Electric.

h) As to the \$88 million which you report spending to date on the Skagit project, please break down such expenditures by category and year. Please do the same for the Pebble Springs project.

i) Please explain in detail the amount and nature of the "substantial additional costs, including cancellation charges" that the company would incur if the 1) Skagit, and 2) Pebble Springs plants were cancelled effective June 1, 1979.

j) Please identify all documents which reflect the "joint ownership arrangements for the Pebble Springs and Skagit projects" referred to at Note (e) on page 7.

k) Please identify the "ownership agreement" referred to on page 9.

l) In view of the discussion on pages 10 and 11, please state whether you have held any discussions with the Bonneville Power Administration, concerning the possibility of the purchase by the Bonneville Power Administration, under regional power legislation, of the output of the Skagit Plants? If you have held such discussions, please state when, where and with whom such discussions

were held, and identify all documents which reflect the fact of, or content of, such discussions.

m) Please explain in detail the proposed source of the funds to be spent for the Company's construction program for the years 1979 through 1989, showing, in view of your best available information and estimates, the source of such funds as between, among other sources, the following: cash on hand, bank lines of credit, commercial paper, corporate notes sold to the public, sale of preferred stock, sale of common stock, and sale of mortgage bonds. Also set forth the schedule of anticipated "rate relief", showing projected dates, and dollar amounts, through 1989, which you believe are required "to maintain necessary earnings coverages".

n) When does the company project that it may be in a position to issue additional shares of preferred stock?

o) What are the "possible additional sources of uranium concentrate for the Skaqit and Pebble Springs Project" which are being investigated at present? Also describe all documents which reflect the fact of or results of such investigations.

p) Please state the range of the "substantially higher prices" which are referred to on Page 13.

q) Please state the basis upon which the company is proceeding with planning for retention of spent fuel on site in connection with the Skagit project, including the number of years of spent fuel which the site is being planned to accommodate, and the quantity of such material which the site is being planned to accommodate.

r) Please describe all correspondence, memoranda, studies, reports, or other documents, not previously identified in responses to discovery, which pertain to the dispute between Puget and General Electric Company over renegotiating the terms of the uranium supply contract for the Skagit plants, and the dispute between Puget and the General Electric Company pertaining to the cost of the nuclear steam supply system for the Skagit plants.

s) Please list the 17 banks referred to on page 38, Note 7. Also describe all documents which reflect the fact of or terms of the "domestic credit line" referred to at that page. State when such credit line will or might terminate.

ANSWER:

REQUEST FOR PRODUCTION NO. 1. Please produce for inspection and copying all documents and other items identified in your answers to the foregoing interrogatories.

DATED this 30th day of May, 1979.



ROGER M. LEED