

June 23, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
UNION ELECTRIC COMPANY) Docket No. STN 50-483 OL
)
(Callaway Plant, Unit 1))

APPLICANT'S OBJECTIONS TO JOINT
INTERVENORS' FIRST SET OF
INTERROGATORIES TO UNION ELECTRIC

Joint Intervenors Coalition for the Environment,
St. Louis Region, Missourians for Safe Energy and Crawdad
Alliance have filed a First Set of Interrogatories to Union
Electric. Applicant submits the following objections to
those interrogatories.

INTERROGATORY 8: With respect to the preceding interrogatory
and separately with respect to each subpart thereof, please
describe fully:

- (c) Any repairs, replacements, or other remedial
or precautionary measures that were taken with
respect to embeds, including an enumeration
of the following:
- (i) the number of manually welded embeds
repaired on site;
 - (ii) the number of manually welded embeds
returned to the fabricator for repair
or replacement;
 - (iii) the number of mechanically welded embeds
repaired on site;
 - (iv) the number of mechanically welded embeds
returned to the fabricator for repair or
replacement.

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- (d) The identity and location of any documents relating to any of the measures specified in answer to this interrogatory.

OBJECTION: Applicant objects to this Interrogatory (subparts (c) and (d)) on the grounds (1) that it is overly broad, burdensome and oppressive in that it would require a search for, collation and review of over 6,000 documents in order to extract, compile and provide the information requested; and (2) that it seeks information not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY 140: Referring to the parameters and assumptions listed under Table 12.2-11 (SNUPPS, FSAR, Vol. 9), state whether Union Electric believes longer fuel storage and compacting of fuel assemblies in the spent fuel pool will change the estimated rate of evaporation and airborne radioactive concentrations.

OBJECTION: Applicant objects to this interrogatory because it seeks information which is irrelevant to the issues in this operating license proceeding. Applicant would not be able to compact fuel assemblies under the terms of the operating license which is under consideration here. In order to compact spent fuel, it would be necessary for Applicant to apply for an amendment to the operating license. The information sought by this interrogatory might be relevant to a licensing proceeding initiated by the Commission if such an application is ever filed.

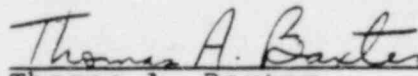
INTERROGATORY 145: State the time periods that Union Electric estimates spent fuel rods can be stored in spent fuel pools before degradation of cladding and structural parts and increased compacting provide an increased risk of a criticality incident.

OBJECTION: Applicant objects to the second part of this interrogatory, which is concerned with the increased risk of

a criticality incident from increased compacting of spent fuel rods. As previously stated, Licensee cannot compact spent fuel under the terms of the operating license application which is the subject of this proceeding.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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Dated: June 23, 1981

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicant's Objections to Joint Intervenors' First Set of Interrogatories to Union Electric" were served this 23rd day of June, 1981 by deposit in the U.S. mail, first class, postage prepaid, to the parties identified on the attached Service List.

Thomas A. Baxter
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