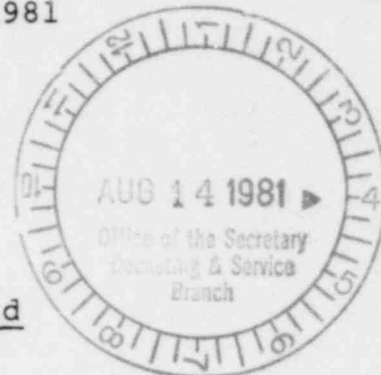


August 13, 1981

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



Before the Atomic Safety and Licensing Board

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

Docket No. 50-382



APPLICANT'S INTERROGATORIES TO  
JOINT INTERVENORS (THIRD SET)

Pursuant to 10 C.F.R. § 2.740b, Louisiana Power & Light Company ("Applicant") submits the following interrogatories to be answered separately and fully in writing, under oath or affirmation, by Save Our Wetlands, Inc. and Oyster Shell Alliance, Inc. ("Joint Intervenors"). In accordance with paragraph 3 of the September 25, 1979 Discovery Stipulation, these interrogatories relate to new information in the NRC Staff's Safety Evaluation Report ("SER") Related to the Operation of Waterford Steam Electric Station, Unit No. 3, bearing on allowed contentions. Pursuant to paragraph 5 of the Discovery Stipulation, these interrogatories must be answered within 30 days, and any objections to the interrogatories must

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be made within 15 days. Answers and objections must be served on all parties and the Licensing Board.

INTERROGATORIES ON CONTENTION 2

2-1. Table 20.1 of the SER states that the Waterford 3 capacity factor is estimated to be as follows:

1983 (partial year)	-	41%
1984	-	65%
1985	-	70%
1986	-	75%
1987	-	75%
1988	-	75%

State whether Joint Intervenors contend that these estimates are inaccurate.

2-2. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that these estimates are inaccurate.

2-3. If the answer to Interrogatory No. 2-1 is affirmative, identify by date, title and author all documents that support Joint Intervenors' contention that these estimates are inaccurate.

2-4. If the answer to Interrogatory No. 2-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of these estimates.

2-5. If the answer to Interrogatory No. 2-1 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the capacity of Waterford 3 for its first full five years of operation;

(b) The method by which Joint Intervenors calculated their estimates of the capacity factors;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the capacity factors; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the capacity factors.

2-6. Table 20.1 of the SER states that the annual cost of operation, including all costs associated with the capital investment and operation and maintenance, including nuclear fuel, of Waterford 3 is estimated to be as follows (in millions):

1983 (partial year)	-	\$296.3
1984	-	\$398.7
1985	-	\$389.4
1986	-	\$388.1
1987	-	\$384.8
1988	-	\$379.1

State whether Joint Intervenors contend that these cost estimates are materially inaccurate.

2-7. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the estimates are inaccurate.

2-8. If the answer to Interrogatory No. 2-6 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the cost estimates are inaccurate.

2-9. If the answer to Interrogatory No. 2-6 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the cost estimates.

2-10. If the answer to Interrogatory No. 2-6 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the first full five years' operating costs for Waterford 3;

(b) The method by which Joint Intervenors calculated their estimate of operating costs;

(c) The date, title and author of each documents upon which Joint Intervenors relied in making their estimate of operating costs; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of operating costs.

2-11. State separately for each answer to the preceding interrogatories on Contention 2 the name, address,

employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying information upon which the answer was based.

#### INTERROGATORIES ON CONTENTION 12

12-1. The SER (§ 11.2.3.3) states that "[t]he packaging and shipping of all wastes will be in accordance with the applicable requirements of 10 C.F.R. Parts 20 and 71, and 49 C.F.R. Parts 170 through 178." State whether Joint Intervenors disagree with this Staff finding.

12-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenors' contention that Licensee will not comply with the referenced regulations.

12-3. If the answer to Interrogatory No. 12-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that Licensee will not comply with the regulations referenced in § 11.2.3.3 of the SER.

12-4. If the answer to Interrogatory No. 12-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that Licensee will not comply with the regulations referenced in § 11.2.3.3 of the SER.

12-5. State separately for each answer to the preceeding interrogatories on Contention 12 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer was based.

INTERROGATORIES ON CONTENTION 17

17-1. The SER (§ 13.3.2.10) states that the Waterford 3 Emergency Plan contains provisions for recommending offsite protective measures, including evacuation, depending on projected dose to the environs and includes maps and information regarding evacuation routes, areas, shelters and area population distribution. Do Joint Intervenors contend that these recommendations make inadequate provision for the evacuation of individuals located within the emergency planning zone?

17-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenors' contention that inadequate provision has been made for the evacuation of individuals within the emergency planning zone.

17-3. If the answer to Interrogatory No. 17-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that inadequate provision has been made for the evacuation of individuals located within the emergency planning zone.

17-4. If the answer to Interrogatory No. 17-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that inadequate provision has been made for the evacuation of individuals located within the emergency planning zone.

17-5. State separately for each answer to the preceding interrogatories on Contention 17 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer is based.

#### INTERROGATORIES ON CONTENTION 19

19-1. Section 4.2.2.4 of the SER describes three hardware modifications undertaken by Applicant to alleviate degradation of fuel element assembly guide tubes (i.e., flow channel extension, flow bypass inserts and sleeve inserts); the Staff concludes that these modifications are potentially effective methods of mitigating guide tube wear. State whether Joint Intervenors contend that the modifications described in Section 4.2.2.4 of the SER are inadequate to provide a "workable solution" to the problem of fuel element assembly guide tube wear.

19-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenors' contention that these modifications are inadequate



to provide a workable solution to the problem of fuel element assembly guide tube wear.

19-3. If the answer to Interrogatory No. 19-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenor rely in contending that these modifications are inadequate to provide a workable solution to the problem of fuel element assembly guide tube wear.

19-4. If the answer to Interrogatory No. 19-1 is affirmative, identify all persons whom Joint Intervenor expect to testify on their behalf concerning their contention that Applicant has not provided a workable solution to the problem of fuel element assembly guide tube wear.

19-5. State separately for each answer to the preceding interrogatories on Contention 19 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer was based.

#### INTERROGATORIES ON CONTENTION 21

21-1. The SER (§§ 2.4.1 and 2.4.2.1) states that the Nuclear Plant Island Structure ("NPIS"), which contains all safety-related components, is flood protected to an elevation of 30.0 feet MSL and that the external flood levels estimated for the three design basis flooding scenarios would be below



this elevation. State whether Joint Intervenors contend that these estimates are materially inaccurate.

21-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenors' contention that the maximum flood level estimates are inaccurate.

21-3. If the answer to Interrogatory No. 21-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that the maximum flood level estimates are inaccurate.

21-4. If the answer to Interrogatory No. 21-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that the maximum flood level estimates are inaccurate.

21-5. If the answer to Interrogatory No. 21-1 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the maximum flood level;

(b) The method by which Joint Intervenors calculated their estimate of the maximum flood level;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the maximum flood level; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenor's estimate of the maximum flood level.

21-6. The SER (§§ 2.4.3 and 2.4.5) states that a system of dry and wet cooling towers, which is not dependent on Mississippi River water for its safety function and which contains an adequate supply of water to provide sufficient cooling in order to permit safe shutdown and cooldown of the plant, will be used for heat removal during normal and emergency conditions. State whether Joint Intervenor's contend that additional backup cooling systems, which are dependent upon Mississippi River water, or modifications to the existing system which is independent of the Mississippi River, are required for heat removal in order to permit safe shutdown and cooldown of the plant.

21-7. If the answer to the preceding interrogatory is affirmative, describe in detail all the facts that support Joint Intervenor's contention that modifications to or systems other than the dry and wet cooling towers are required for heat removal in order to permit safe shutdown and cooldown of the plant.

21-8. If the answer to Interrogatory No. 21-6 is affirmative, identify by author, title and date all documents

upon which Joint Intervenor rely in contending that modifications to or systems other than the dry and wet cooling towers are required for heat removal in order to permit safe shutdown and cooldown of the plant.

21-9. If the answer to Interrogatory No. 21-6 is affirmative, identify all persons whom Joint Intervenor expect to testify on their behalf concerning their contention that modifications to or systems other than the dry and wet cooling towers are required for heat removal in order to permit safe shutdown and cooldown of the plant.

21-10. State separately for each answer to the preceding interrogatories on Contention 21 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer was based.

#### INTERROGATORIES ON CONTENTION 23

23-1. Do Joint Intervenor contend that the SER (§ 2.5.5) is incorrect in finding that the stability of the levee is not at issue, in that the ultimate heat sink is contained entirely within the NPIS and, further, that there are no slopes in the vicinity of Waterford 3 whose failures could adversely affect the plant?

23-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint

Intervenors' contention that failure of the levee and/or other slopes within the vicinity of Waterford 3 could adversely affect the plant.

23-3. If the answer to Interrogatory No. 23-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that failure of the levee and/or other slopes within the vicinity of Waterford 3 could adversely affect the plant.

23-4. If the answer to Interrogatory No. 23-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that failure of the levee and/or other slopes within the vicinity of Waterford 3 could adversely affect the plant.

23-5. If the answer to Interrogatory No. 23-1 is affirmative, state in detail:

(a) The specific slope failures that Joint Intervenors contend could adversely affect the plant;

(b) The method by which Joint Intervenors identified those specific slope failures which they contend could adversely affect the plant;

(c) The author, title and date of each document upon which Joint Intervenors relied in identifying those specific slope failures which Joint Intervenors contend could adversely affect the plant; and

(d) The name, address, employer, position and qualifications of each person who assisted or contributed in identifying those specific slope failures which Joint Intervenors contend could adversely affect the plant.

23-6. The SER (§ 2.5.1) states that "[n]o capable faults are known to exist within the plant area." State whether Joint Intervenors contend that this statement is materially inaccurate.

23-7. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenors' contention that capable faults exist within the plant area.

23-8. If the answer to Interrogatory No. 23-6 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that capable faults exist within the plant area.

23-9. If the answer to Interrogatory No. 23-6 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that capable faults exist within the plant area.

23-10. If the answer to Interrogatory No. 23-6 is affirmative, state in detail:

(a) The identity of each capable fault which Joint Intervenors contend exists in the plant area;

(b) The method by which Joint Intervenors identified capable faults which Joint Intervenors contend exist in the plant area;

(c) The author, title and date of each document upon which Joint Intervenors relied in identifying those capable faults which Joint Intervenors contend exist in the plant area; and

(d) The name, address, employer, position and qualifications of each person who assisted or contributed in making Joint Intervenors' identification of those capable faults which Joint Intervenors contend exist in the plant area.

20-11. The SER (§ 2.5.2.4) states that Applicant's proposed safe shutdown earthquake ("SSE") acceleration level of 0.10 g is a conservative representation of the SSE and, further, that ground motion would not exceed the SSE response spectrum. Do Joint Intervenors contend that these statements are materially inaccurate?

23-12. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that these statements are inaccurate.



23-13. If the answer to Interrogatory No. 23-11 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the Staff findings in § 2.5.2.4 of the SER are inaccurate.

23-14. If the answer to Interrogatory No. 23-11 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that the Staff findings in § 2.5.2.4 are inaccurate.

23-15. If the answer to Interrogatory No. 23-11 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the SSE acceleration level;

(b) The method by which Joint Intervenors calculated their estimate of the SSE acceleration level;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the SSE acceleration level; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the SSE acceleration level.



23-16. The SER (§ 2.5.2.5) states that the Applicant's proposed acceleration level of 0.05 g for the operating basis earthquake ("OBE") acceleration level is adequately conservative for the Waterford 3 site. State whether Joint Intervenors contend that the proposed OBE acceleration level is materially inaccurate.

23-17. If the answer to the preceding interrogatory is affirmative, state in detail all the facts that support Joint Intervenors' contention that the OBE acceleration level is inaccurate.

23-18. If the answer to Interrogatory No. 23-16 is affirmative, identify by date, author and title all documents that support Joint Intervenors' contention that the OBE acceleration level is inaccurate.

23-19. If the answer to Interrogatory No. 23-16 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning the accuracy of the OBE acceleration level.

23-20. If the answer to Interrogatory No. 23-16 is affirmative, state in detail:

(a) Joint Intervenors' estimate of the OBE acceleration level;

(b) The method by which Joint Intervenors calculated their estimate of the OBE acceleration level;

(c) The date, title and author of each document upon which Joint Intervenors relied in making their estimate of the OBE acceleration level; and

(d) The name, address, employer, position and qualifications of each person who assisted in making Joint Intervenors' estimate of the OBE acceleration level.

23-21. State separately for each answer to the preceding interrogatories on Contention 23 the name, address, employer, position and qualifications of the person or persons drafting the answer, and, if different, of the person or persons supplying the information on which the answer was based.

INTERROGATORIES ON CONTENTIONS 24 and 25

24/25-1. The SER (§ 22.2 at 22-57, 58) states that Applicant will install two in-containment radiation level monitors which meet the specifications of Item II.F.1-3 of NUREG-0737. State whether Joint Intervenors contend that these in-containment radiation monitors are inadequate to measure the radiation levels inside the Waterford 3 containment.

24/25-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenors' contention that the radiation monitors

described at pages 22-57 and 22-58 of the SER are inadequate to measure the radiation level inside the Waterford 3 containment.

24/25-3. If the answer to Interrogatory 24/25-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenor's rely in contending that the radiation monitors described at pages 22-57 and 22-58 of the SER are inadequate to measure the radiation level inside the Waterford 3 containment.

24/25-4. If the answer to Interrogatory No. 24/25-1 is affirmative, state in detail:

(a) The additional instrumentation, and specific parameters to be indicated, which Joint Intervenor's contended are necessary in order to detect radiation levels inside containment;

(b) The author, title and date of each document upon which Joint Intervenor's relied in determining the additional instrumentation contended to be necessary in order to detect radiation levels inside containment; and

(c) The name, address, employer, position and qualifications of each person who assisted or contributed in making Joint Intervenor's determination of additional instrumentation contended to be

necessary in order to detect radiation levels inside containment.

24/25-5. If the answer to Interrogatory No. 24/25-1 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that the radiation monitors described at pages 22-57 and 22-58 of the SER are inadequate to measure the radiation level inside the Waterford 3 containment.

24/25-6. The SER (§ 5.2.5) states that pressurizer safety valve leakage to the quench tank is monitored in the main control room by temperature indicators and alarms on the pressurizer safety valve discharge line and the level and temperature indicator on the quench tank. Further, the SER concludes that the overall reactor coolant pressure boundary leakage detection systems provide reasonable assurance that primary system leakage will be detected and meet the requirements of General Design Criterion 30 and Regulatory Guide 1.45 and are, therefore, acceptable. State whether Joint Intervenors contend that the measurement of the parameters described in SER § 5.2.5, is inadequate to indicate the existence of fluid flow and high temperature in the discharge pipes of the safety relief valves.

24/25-7. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support

Joint Intervenors' contention that Applicant has not provided adequate instrumentation to indicate the existence of fluid flow and high temperature in the discharge pipes of the safety relief valves.

24/25-8. If the answer to Interrogatory No. 24/25-6 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that Applicant has provided inadequate instrumentation to indicate the existence of fluid flow and high temperature in the discharge pipes of the safety relief valves.

24/25-9. If the answer to Interrogatory No. 24/25-6 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that Applicant has provided inadequate instrumentation to indicate the existence of fluid flow and high temperature in the discharge pipes of the safety relief valves.

24/25-10. If the answer to Interrogatory No. 24/25-6 is affirmative, state in detail:

(a) The additional instrumentation, and specific parameters to be indicated, which Joint Intervenors contend are necessary in order to detect fluid flow and high temperatures in the discharge pipes of the safety relief valves;

(b) The author, title and date of each document upon which Joint Intervenors relied in determining the additional instrumentation contended to be necessary in order to detect fluid flow and high temperatures in the discharge pipes of the safety relief valves; and

(c) The name, address, employer, position and qualifications of each person who assisted or contributed in making Joint Intervenors' determination of additional instrumentation contended to be necessary in order to detect fluid flow and high temperatures in the discharge pipes of the safety relief valves.

24/25-11. The SER (§ 22.2 at 22-61, 62) describes the hydrogen analyzer system portion of the Waterford 3 combustible gas control system and concludes that the hydrogen analyzer system is in full compliance with the requirements of Item II.F.1-6 of NUREG-0737. State whether Joint Intervenors contend that the hydrogen analyzer system will not provide sufficient information for the control room operators to infer that there may be a hydrogen burn or explosion in the containment.

24/25-12. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support

Joint Intervenors' contention that the hydrogen analyzer system will not provide sufficient information for the control room operators to infer that there may be a hydrogen burn or explosion in the containment.

24/25-13. If the answer to Interrogatory No. 24/25-11 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that the hydrogen analyzer system will not provide sufficient information for the control room operators to infer that there may be a hydrogen burn or explosion in the containment.

24/25-14. If the answer to Interrogatory No. 24/25-11 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that the hydrogen analyzer system will not provide sufficient information for the control room operators to infer that there may be a hydrogen burn or explosion in the containment.

24/25-15. If the answer to Interrogatory No. 24/25-11 is affirmative, state in detail:

(a) The additional instrumentation, and specific parameters to be indicated, which Joint Intervenors contend are necessary in order for the control room operators to infer that there may be a hydrogen burn or explosion in the containment;



(b) The author, title and date of each document upon which Joint Intervenors relied in determining the additional instrumentation contended to be necessary in order for the control room operators to infer that there may be a hydrogen burn or explosion in the containment; and

(c) The name, address, employer, position and qualifications of each person who assisted or contributed in making Joint Intervenors' determination of additional instrumentation contended to be necessary in order for the control room operators to infer that there may be a hydrogen burn or explosion in the containment.

24/25-16. The SER (§ 22.2 at 22-36, 37) describes Applicant's program to ensure that all operating personnel are trained in the use of installed plant systems to control or mitigate an accident in which the core is severely damaged. State whether Joint Intervenors contend that the training program described will not provide sufficient information for the control room operators to be aware of and remedy fuel rod cladding failures and/or melting.

24/25-17. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenors' contention that the training program

described at pages 22-36, 37 of the SER will not provide sufficient information for control room operators to be aware of and remedy fuel rod cladding failures and/or melting.

24/25-18. If the answer to Interrogatory No. 24/25-16 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that the training program described at pages 22-36, 37 of the SER will not provide sufficient information for control room operators to be aware of and remedy fuel rod cladding failures and/or melting.

24/25-19. If the answer to Interrogatory No. 24/25-16 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that the training program described at pages 22-36, 37 of the SER will not provide sufficient information for control room operators to be aware of and remedy fuel rod cladding failures and/or melting.

24/25-20. If the answer to Interrogatory No. 24/25-16 is affirmative, state in detail:

(a) The additional training or instrumentation, and specific parameters to be indicated, which Joint Intervenors contend are necessary in order for control room operators to be aware of and remedy fuel rod cladding failures and/or melting;

(b) The author, title and date of each document upon which Joint Intervenors relied in determining the additional training or instrumentation contended to be necessary in order for control room operators to be aware of and remedy fuel rod cladding failures and/or melting; and

(c) The name, address, employer, position and qualifications of each person who assisted or contributed in making Joint Intervenors' determination of additional training or instrumentation contended to be necessary in order for control room operators to be aware of and remedy fuel rod cladding failures and/or melting.

24/25-21. State separately for each answer to the preceding interrogatories on Contentions 24 and 25 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer was based.

#### INTERROGATORIES ON CONTENTION 26

26-1. The SER (§ 13.3.2.1) describes the functions and responsibilities of each state and local organization, as well as the functions and responsibilities of Applicant, in response to emergency conditions at Waterford

3. State whether Joint Intervenor's contend that the allocation of decision-making capability as described in Section 13.3.2.1 of the SER is inadequate.

26-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenor's contention that the allocation of decision-making capability during an emergency condition at Waterford 3 is inadequate.

26-3. If the answer to Interrogatory No. 26-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenor's rely in contending that the allocation of decision-making capability during an emergency condition at Waterford 3 is inadequate.

26-4. If the answer to Interrogatory No. 26-1 is affirmative, identify all persons whom Joint Intervenor's expect to testify on their behalf concerning their contention that the allocation of decision-making capability during an emergency condition at Waterford 3 is inadequate.

26-5. State whether Joint Intervenor's disagree with the statement in the SER (§ 13.3.2.5) that the Waterford 3 Emergency Plan and associated procedures establish and describe a notification and verification system which is consistent with Appendix 1 to NUREG-0654.

26-6. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenor's contention that the Waterford 3 Emergency Plan does not provide for an adequate notification and verification system.

26-7. If the answer to Interrogatory No. 26-5 is affirmative, identify by author, title and date all documents upon which Joint Intervenor's rely in contending that the Waterford 3 Emergency Plan does not provide for an adequate notification and verification system.

26-8. If the answer to Interrogatory No. 26-5 is affirmative, identify all persons whom Joint Intervenor's expect to testify on their behalf concerning their contention that the Waterford 3 Emergency Plan does not provide for an adequate notification and verification system.

26-9. The SER (§ 13.3.2.6) states that Applicant has provided primary and back-up communication links which include provisions for 24-hour-a-day notification of Federal, State, and local emergency response organizations within the ten-mile emergency planning zone. State whether Joint Intervenor's contend that this communications system will not provide adequate communications between Applicant, State and local authorities and the NRC.

26-10. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint

Intervenors' contention that Applicant's communications system will not provide adequate communication between Applicant, State and local authorities and the NRC during emergency conditions at Waterford 3.

26-11. If the answer to Interrogatory No. 26-9 is affirmative, identify by author, title and date all documents upon which Joint Intervenors rely in contending that Applicant's communications system will not provide adequate communication between Applicant, State and local authorities and the NRC during emergency conditions at Waterford 3.

26-12. If the answer to Interrogatory No. 26-9 is affirmative, identify all persons whom Joint Intervenors expect to testify on their behalf concerning their contention that Applicant's communications system will not provide adequate communication between Applicant, State and local authorities and the NRC during emergency conditions at Waterford 3.

26-13. State separately for each answer to the preceding interrogatories on Contention 26 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, of the person or persons supplying the information upon which the answer was based.

#### INTERROGATORIES ON CONTENTION 27

27-1. State whether Joint Intervenors disagree with the statement in the SER (§ 13.3.2.9) that the Waterford 3



Emergency Plan "describes the offsite monitoring program which includes, but is not limited to, capability and resources for field monitoring within the plume EPZ. The Plan also describes activation, notification means, field team composition, transportation, communication, monitoring equipment, deployment time, and capability to detect and measure radioiodine in the plume EPZ as low as  $10^{-7}$  uCi/cc under field conditions."

27-2. If the answer to the preceding interrogatory is affirmative, state in detail all facts that support Joint Intervenor's contention that Applicant has not presently indicated how it plans to provide for adequate radiation monitoring in the area surrounding the facility.

27-3 If the answer to Interrogatory No. 27-1 is affirmative, identify by author, title and date all documents upon which Joint Intervenor's rely in contending that Applicant has not presently indicated how it plans to provide for adequate radiation monitoring in the area surrounding the facility.

27-4. If the answer to Interrogatory No. 27-1 is affirmative, identify all persons whom Joint Intervenor's expect to testify on their behalf concerning their contention that Applicant has not presently indicated how it plans to provide for adequate radiation monitoring in the area surrounding the facility.



27-5. State separately for each answer to the preceding interrogatories on Contention 27 the name, address, employer, position and qualifications of the person or persons drafting the answer and, if different, the person or persons supplying the information upon which the answer was based.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE  
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(202) 822-1000

BY: Ernest L. Blake, Jr.  
Ernest L. Blake, Jr.  
James B. Hamlin

Counsel for Applicant  
Louisiana Power & Light Company

DATED: August 13, 1981.

August 13, 1981

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)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicant's Interrogatories To Joint Intervenors (Third Set), dated August 13, 1981, were served upon those persons on the attached Service List, by deposit in the United States mail, postage prepaid, this 13th day of August, 1981.

Ernest L. Blake, Jr.  
Ernest L. Blake, Jr.

DATED: August 13, 1981.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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(Waterford Steam Electric )  
Station, Unit 3) )

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