

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD 13 P3:38

In the Matter of)
)
WASHINGTON PUBLIC POWER SUPPLY SYSTEM) Docket No. 50-460CPA
et. al.)
)
(WPPSS Nuclear Project No. 1))

COALITION FOR SAFE POWER SECOND SET OF INTERROGATORIES
TO APPLICANT, JUNE 9, 1983.

INTERROGATORY 1: State the full name, address, occupation and employer of each person answering the interrogatories and designate the interrogatory or the part thereof he or she answered.

INTERROGATORY 2: Identify each and every person you are considering calling as a witness in the event a hearing is held in this proceeding and with respect to each of these witnesses:

- a. State the substance of the facts and opinions to which the witness is expected to testify;
- b. Give a summary of the grounds for each opinion; and
- c. Describe the witnesses' educational and professional background.

INTERROGATORY 3: What is the complete basis for your position that Licensee's decision in April, 1982 to 'defer' construction for two to five years, and subsequent cessation of construction at WNP-1 was not "dilatory."

INTERROGATORY 4: Please explain fully what you mean by the word "defer" .

INTERROGATORY 5: Please explain fully what you mean by the word "dilatory" .

INTERROGATORY 6: What is the basis for your response to interrogatories 4 and 5?

INTERROGATORY 7: Why do you contend that Licensee has established good cause for an extension of the WNP-1 construction permit? Explain your answer fully.

INTERROGATORY 8: What are the reasons Licensee offered to NRC in support of a showing of "good cause" as required by 10 C.F.R. 50.55(b)?

INTERROGATORY 9: Is it your position that the reasons offered by Licensee to support a showing of good cause are in fact the only reasons why Licensee had requested an extension of its construction permit?

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INTERROGATORY 10: If your response to Interrogatory 9 is no, state all other reasons.

INTERROGATORY 11 : What is the basis for your response to interrogatories 9 and 10?

INTERROGATORY 12: Please explain fully what you mean by a "reasonable period of time"

INTERROGATORY 13: What factors do you contend should be considered when determining if a requested construction permit extension is for a "reasonable period of time"?

INTERROGATORY 14: What do you contend would constitute a "reasonable period of time" in the case of WNP-1?

INTERROGATORY 15: (a) Is it your position that BPA support is necessary to the financing of WNP-1?

(b) if your answer to Interrogatory No. 15(a) is in the affirmative, identify and give full details with respect to all information upon which you base that statement.

INTERROGATORY 16: Is it your position that the financial support or lack of financial support by BPA for WNP-1 would have an effect on the financing costs of WNP-1?

INTERROGATORY 17: Is it your position that the opinion of BPA as to when WNP-1 should go into commercial operation would have an effect on the financing costs of WNP-1?

INTERROGATORY 18: (a) Is it your belief that BPA has the authority to disapprove any further financing of WNP-1 construction?

(b) If your answer to Interrogatory No. 18(a) is in the affirmative, explain fully the factual basis for that statement.

INTERROGATORY 19: Is it your position that the growth rate of electric power requirements has a business relationship as to when WNP-1 should go into commercial operation?

INTERROGATORY 20: (a) Is it your position that the January 11, 1983 letter to H. Denton, Director, NRR, NRC from G.D. Bouchy, WPPSS, supports Permittee's assertion that a deferred need for power constitutes "good cause" for deferring construction?

(b) If your answer to Interrogatory No. 20(a) is in the affirmative, set forth and explain fully the factual basis or legal authority for your position.

INTERROGATORY 21: (a) Is it your position that a lack of need for power can, as a matter of law, constitute "good cause" under 10 CFR 50.55(b)?

(b) if your answer to Interrogatory No. 21(a) is in

the affirmative, set forth and explain fully the factual basis or legal authority for this position.

INTERROGATORY 22: (a) Does the lack of need for power in the Northwest justify deferring construction of WNP-1?

(b) Explain fully your answer to Interrogatory No. 22(a).

INTERROGATORY 23: Explain the factual basis and/or legal authority which supports the position that six to nine years is a 'reasonable period of time' under 10 CFR 50.55(b).

INTERROGATORY 24: What do you believe would be a (maximum) reasonable period of time for extension of the construction completion date for WNP-1?

INTERROGATORY 25: Explain the difference, if any, between deferral, mothball and preservation.

INTERROGATORY 26: To what events is the restart of construction on WNP-1 tied. Explain fully your answer.

INTERROGATORY 27: What would be the effect of default on WNP-4 and 5 on the restart and completion of WNP 1? Provide all probability analyses, scenarios and time predictions.

INTERROGATORY 28: What is the effect of deferral of construction on WNP-3 on the restart and completion of WNP-1? Give the basis for your response.

INTERROGATORY 29: What is the effect of bond ratings on WPPSS ability to finance WNP-1. Explain fully and provide the basis for your response.

INTERROGATORY 30: If a bond rating service refused to rate WPPSS bonds would WPPSS be able to finance the construction of WNP-1? Explain your answer.

INTERROGATORY 31: Is it your position that the Atomic Safety and Licensing Board Initial Decision (LBP-75-72, 2 NRC 922) for the Construction Permit found that the Bonneville Power Administration had the power to approve or disapprove the issuance of bonds by WPPSS. If yes give the reasons in detail for approval and/or disapproval.

INTERROGATORY 32: Is it your position the ASLB Initial Decision (LBP-75-72, 2 NRC 922) found that BPA could control the construction of WNP-1? If yes, in what manner? Explain in detail the basis for your answer.

INTERROGATORY 33: Is it your position that the original finding by the ASLB in its Initial Decision (LBP-75-72, 2 NRC 922) on WPPSS financing ability remains valid? Explain the basis for your answer in detail.

INTERROGATORY 34: Is it your position that the original finding by the ASLB in its Initial Decision (LBP-75-72, 2 NRC 922) on the need for WNP-1 remains valid? Explain the basis for your answer in detail.

INTERROGATORY 35: Is it your position that the only reason the ASLB Initial Decision (LBP-75-72, 2 NRC 922) found WPPSS financially qualified is because of BPA financial backing?

(a) If yes, explain the basis in detail.

(b) If no, cite all the reasons you believe the finding of financial qualification.

INTERROGATORY 36: What constitutes "good business sense" in decisions on nuclear plant deferral?

INTERROGATORY 37: What constitutes "BPA support"?

INTERROGATORY 38: How is "BPA support" recognized in the Initial Decision (LBP-75-72, 2 NRC 922) on the Construction Permit for WNP-1?

INTERROGATORY 39: Is cost of financing an issue in this proceeding? If so, why?

INTERROGATORY 40: Is need for power an issue in this proceeding? If so, what are the issues which should be litigated with regard to need for power?

INTERROGATORY 41: What is the legal basis for your answer to Interrogatory 40?

INTERROGATORY 42: Was the construction of WNP-3 (Satsop) halted because of no need for its power?

(a) If so, how does this affect the five-year deferral of WNP-1?

(b) If not, what were the reasons and how will they affect the deferral of WNP-1?

INTERROGATORY 43: Is the ultimate cost of power from WNP-1 a factor in the need for the plant? Should it be a factor in the business decisions affecting continued construction?

INTERROGATORY 44: Does licensee now have the ability to finance any of its projects.

(a) If yes, name the projects, method of financing, and state whether or not BPA approval is necessary and whether or not approval has been granted.

(b) If no, state why, including any BPA disapproval of financing.

INTERROGATORY 45: If the answer to Interrogatory 44 states that financing is not available now for WNP-1, state:

(a) when will the circumstances identified, change (b) why will they change and (c) what assurance is there that they

will be changed five years from the deferral of WNP-1?

INTERROGATORY 46: What is the difference between BPA withholding approval for financing and BPA disapproving of financing?

INTERROGATORY 47: What level of staffing is necessary at WNP-1 to maintain the construction site and equipment without deterioration ?

INTERROGATORY 48: Is it your position that the only obstacle to financing of the WNP-1 was/is the BPA recommendation?

INTERROGATORY 49: In response to Interrogatory 4 of "Intervenor's First Set of Interrogatories" you stated that the last sale of bonds for WNP-1 was February 11, 1982:

(a) provide a copy of the prospectus that accompanied that bond sale;

(b) state what the revenues from that bond sale were to be used for;

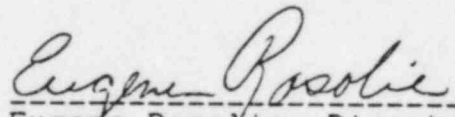
(c) what were the revenues used for if different then that in (b);

(d) at that time, when was the next bond issuance contemplated?

INTERROGATORY 50: Do you agree that the passage of Washington Initiative 395 affected the ability of WPPSS to issue bonds? Explain your answer fully giving the basis and identify all documents relied upon.

Respectfully submitted,

Dated this day, the 9th
of June, 1983.



Eugene Rosolie, Director
Coalition for Safe Power

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CERTIFICATE OF SERVICE

I hereby certify that copies of "COALITION FOR SAFE POWER SECOND SET OF INTERROGATORIES TO APPLICANT, JUNE 6, 1983" and "COALITION FOR SAFE POWER FIRST SET OF INTERROGATORIES TO NRC STAFF, JUNE 9, 1983" in the above-captioned proceeding were served upon the following by deposit in the United States mail, postage prepaid, first class this 9th day of June, 1983.

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Coalition for Safe Power