

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

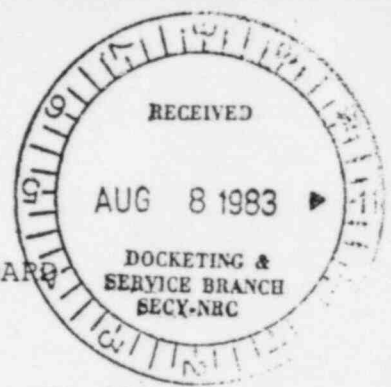
HOUSTON LIGHTING AND POWER
COMPANY, ET AL.

(South Texas Projects, Units 1
& 2)

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§

Docket Nos. 50-498
50-499

RELATED CORRESPONDENCE



STATE OF TEXAS'S FIRST SET OF
INTERROGATORIES TO APPLICANTS ON CONTENTION 4

1. Do the Applicants contend that there are no recorded
hurricanes

- a. in the Gulf of Mexico
- b. in the North Atlantic Ocean

in which the fastest mile wind speed, 30 ft. above ground has been
higher than 125 mph?

2. Please define "fastest mile wind speed" as used by the
Applicants in answering interrogatory 1.

3. If the answer to interrogatory 1 is "no,"

a. please identify hurricanes whose fastest mile wind
speed, 30 ft. above ground exceeded 125 mph and provide the speed
for each hurricane.

b. please explain the selection of 125 mph as the design
wind velocity for the fastest mile wind speed at STNP.

c. Please identify all studies or documents relied upon
in answering 3a and 3b.

4. If the answer to interrogatory 1 is "yes," please provide
Applicants' position on the fastest mile wind speed for each of the

following:

a. The hurricane on September 27 through October 6, 1949 making landfall near Freeport, Texas

b. Hurricane Carla (1961)

c. Hurricane Hilda (1964)

d. Hurricane Betsy (1965)

e. Hurricane Celia (1970)

f. Hurricane Allen (1980)

g. Hurricane Anita

5. Please identify all studies or documents relied upon in answering interrogatory 4.

6. a. What is the peak hurricane wind gust value used by Applicants in designing STNP?

b. Where is this value documented in Applicant's filings with the NRC? Please provide a copy of said filing.

c. Please identify all studies or documents relied upon in answering interrogatory 6.

7. Do the Applicants contend that there are no recorded hurricanes

a. in the Gulf of Mexico

b. In the North Atlantic Ocean

in which the peak wind gust has been higher than the value given in response to interrogatory 6a?

8. If the answer to interrogatory 7 is "no,"

a. please identify the hurricanes whose gusts exceeded the value given in answer to interrogatory 6

b. the highest gust for each hurricane identified

c. please explain Applicants' selection of the value given in answer to interrogatory 6a.

d. please identify all studies or documents relied upon in answering 8a and 8b.

9. Please produce a copy of the non-published private correspondence dated Jun 1974 referenced in the October 15, 1982 Memorandum and Order of the ASLB in this proceeding (and apparently also referenced in FSAR Section 2.3.1.2.6., at p. 2.3-6a).

10. What is the Applicants' position on the extent of the "surrounding area" required to be considered by 10 CFR Part 50, Appendix A, Criterion 2? Please explain the basis for Applicants' position.

11. Would the design of STNP differ if the Applicants had selected a fastest mile speed of 185 mph rather than 125 mph? If so, please describe generally how the design would have differed. If not, please explain why not.

12. Would the design of STNP differ if the Applicants had selected a peak gust value of 200 mph rather than the value given in response to interrogatory 6a? If so, please describe generally how the design would have differed. If not, please explain why not.

13. Please identify each witness Applicants intend to call on Contention 4 and summarize the testimony of each.

14. Is it Applicants' position that having designed parts of STNP to withstand missiles carried by tornado winds of 360 mph, these same parts of STNP are therefore designed to withstand a fastest mile wind speed of 360 mph? Please explain.

15. a. What is the heaviest rainfall Applicants have considered in the design of STNP?

b. Please identify studies or documents Applicants relied upon for their answer to interrogatory 15.

16. a. What is the highest flood crest on the Colorado River Applicants have considered in the design of STNP?

b. Please identify all studies or documents Applicants relied upon in answering interrogatory 16.

17. a. What is the highest hurricane storm surge Applicants have considered in the design of STNP?

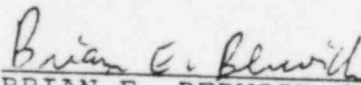
b. Please identify all studies and documents Applicants relied upon in answering interrogatory 17.

18. Please identify the witnesses Applicants intend to call on Contention 4 and summarize their testimony.

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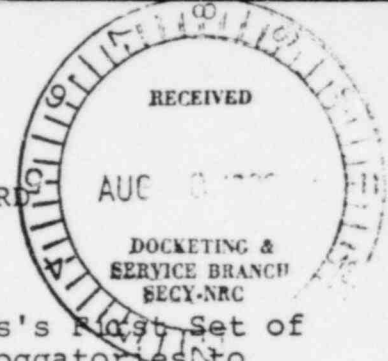
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NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

CERTIFICATE OF SERVICE



I hereby certify that copies of State of Texas's First Set of Interrogatories to Applicants on Quadrex and Interrogatories to Applicants on Contention 4, were served by deposit in the United States Mail, first class postage paid to the following individuals and entities on the 5th day of August, 1983, except that service on the single-asterisked people was by federal express and on the double asterisked people was by hand.

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