

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	Docket Nos. 50-266
)	50-301
WISCONSIN ELECTRIC POWER)	
COMPANY)	Amendment to License Nos.
)	DPR-24 and DPR-27
(Point Beach Nuclear Plant,)	(Increase Spent Fuel
Units 1 and 2))	Storage Capacity)

APPLICANTS' INTERROGATORIES TO INTERVENOR

SET NO. 1

Pursuant to Sections 2.740 and 2.740b of the Commission's Rules of Practice, Wisconsin Electric Power Company (Applicant) requests that Lakeshore Citizens for Safe Energy (Intervenor) answer separately and fully in writing, under oath or affirmation, each of the interrogatories contained herein. Applicant requests that the person or persons answering each interrogatory be identified. This set of interrogatories is addressed to specified contentions or subcontentions contained in Intervenor's Amended Contentions as revised by Order of the Atomic Safety and Licensing Board dated September 1, 1978.

LPDR

7810130225

PDR ADOCK 050-266
PDR ADOCK 050-301

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Contention 3b

1. Specify and describe the "increased worker activity" which Intervenor contends will be necessitated by compaction.
2. Explain the mechanism or mechanisms by which Intervenor contends that such increased worker activity may result in a blockage of either the entrance or discharge coolant water pipe.

Contention 3d (as revised)

1. Specify and describe the "increased worker activity at the pool" to which this contention refers.
2. Explain separately the way, including specific mechanism or mechanisms, in which Intervenor contends that such increased worker activity may increase the possibility of each of the following accidents:
 - (a) Loss of volume of coolant water in the spent fuel pool.
 - (b) Loss of volume or flow of service water through the heat exchanger.
 - (c) Loss of service water pumps.

Contention 3e (as revised)

1. Specify and describe the "increased worker activity at the pool" to which this contention, as revised, refers.
2. Explain the way, including specific mechanism or mechanisms, in which Intervenor contends that such increased worker activity may increase the possibility of damage to the pool liner.

Contention 5

1. Specify the incident or incidents which Intervenor contends could result in a pool failure.
2. State with respect to each such incident whether, and if so how, the fuel storage expansion program will contribute either to the likelihood of the incident or to the potential for pool failure as a result of the incident.

Contention 6 (as revised)

1. Specify and describe the "increased activity" which Intervenor contends could result in pool leakage.
2. Explain the mechanism or mechanisms by which Intervenor contends that such increased activity may result in pool leakage.

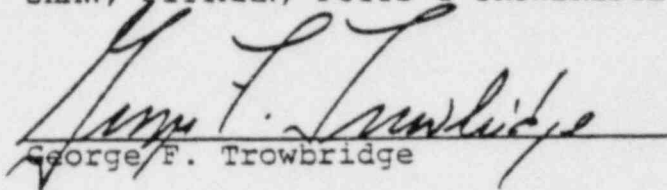
Contention 9

1. Specify each incident associated with the storage of spent fuel which Intervenor contends might create an evacuation or emergency situation for which a medical and health care plan would be necessary.
2. Explain fully any causal connections which Intervenor contends may exist between the occurrence of such incident and more dense and increased storage of spent fuel.

3. Explain in what respect Intervenor contends that the medical and health care plan contained in Applicant's emergency plan is inadequate to cope with injuries in evacuation or emergency situations due to more dense and increased storage of spent fuel. A copy of Applicant's emergency plan, as revised and updated to September 12, 1977, has previously been furnished to Intervenor.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE


George F. Trowbridge

Dated: October 2, 1978

October 2, 1978

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Interrogatories to Intervenor Set No. 1," dated October 2, 1978, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 2nd day of October, 1978.


George F. Trowbridge

Dated: October 2, 1978

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