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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
)
UNITED STATES DEPARTMENT OF ENERGY)
)
PROJECT MANAGEMENT CORPORATION)
)
TENNESSEE VALLEY AUTHORITY)
)
(Clinch River Breeder Reactor Plant))

Docket No. 50-537



APPLICANTS' RESPONSE TO INTERVENORS',
NATURAL RESOURCES DEFENSE COUNCIL, INC.
AND SIERRA CLUB, SIXTEENTH SET
OF INTERROGATORIES TO THE APPLICANTS

Pursuant to 10 C.F.R. § 2.740b., the United States Department of Energy and Project Management Corporation, acting for themselves and on behalf of the Tennessee Valley Authority (the Applicants), hereby respond to Intervenor's', Natural Resources Defense Council, Inc., and the Sierra Club, Sixteenth Set of Interrogatories to the Applicants, dated March 18, 1982. */

*/ This Response addresses interrogatories Contention 11 (old 8) II, 2 and 3. The Applicants' March 29, 1982 Motion for A Protective Order objected to and sought relief from these Interrogatories. The Board's April 6, 1982 ruling during the prehearing meeting of counsel denied Applicants' Motion as to these interrogatories. This completes Applicants' responses to interrogatory set sixteen.

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Answers to General Questions (a) - (f)

(a) Provide the direct answer to the question.

ANSWER: See the direct answers below under heading "ANSWER".

(b) Identify all documents and studies, and the particular parts thereof, relied upon by Applicants, now or in the past, which serve as the basis for the answer. In lieu thereof, at Applicants' option, a copy of such document and study may be attached to the answer.

ANSWER: See the direct answers below under heading "DOCUMENTS".

(c) Identify principal documents and studies, and the particular parts thereof, specifically examined but not cited in (b). In lieu thereof, at Applicants' option, a copy of each such document and study may be attached to the answer.

ANSWER: Unless otherwise indicated below in regard to the answer under the heading "DOCUMENTS"; none.

(d) Identify by name, title and affiliation the primary Applicant employee(s) or consultant(s) who provided the answer to the question.

ANSWER: See the attached affidavits.

- (e) Explain whether Applicants are presently engaged in or intend to engage in any further, ongoing research program which may affect Applicants' answer. This answer need be provided only in cases where Applicants intend to rely upon ongoing research not included in Section 1.5 of the PSAR at the LWA or construction permit hearing on the CRBR. Failure to provide such an answer means that Applicants do not intend to rely upon the existence of any such research at the LWA or construction permit hearing on the CRBR.

ANSWER: If not in Section 1.5 of the PSAR and the direct answer below; none.

- (f) Identify the expert(s) if any, which Applicants intent to have testify on the subject matter questioned, and state the qualifications of each such expert. This answer may be provided for each separate question or for a group of related questions. This answer need not be provided until Applicants have in fact identified the expert(s) in question or determined that no expert will testify, as long as such answer provides reasonable notice to Intervenor.

ANSWER: Applicants have not yet identified the expert(s) in question.

Answers to Specific Questions

II. Contention 11 (old Contention 8)

2. Identify the latest EPA position with respect to proposed occupational exposure limits.

ANSWER: The latest EPA position on the "Federal Radiation Protection Guidance for Occupational Exposures" was published in the Federal Register, Volume 46 No. 15, Friday, January 23, 1981. The Federal Register notice was a request for written comments and was supported by the document below.

DOCUMENTS: Occupational Exposure to Ionizing Radiation in the United States - EPA 520/4-80-001.

3. Identify the latest Applicant position with regard to proposed occupational exposure limits.

ANSWER: The latest DOE position is reflected in (1) the oral testimony transmitted by Barton House, Acting Assistant Secretary for Environmental Protection, Safety and Emergency Preparedness (DOE) to W. A. Mills, Director, Criteria and Standards Division (EPA), dated April 17, 1981, and (2) written DOE comments dated July 10, 1981, transmitted by S. H. Greenleigh, Acting Deputy Assistant Secretary for Environment, Safety and Health to the Director, Criteria and Standards Division (EPA).

DOCUMENTS: Copies of the foregoing documents will be made available for inspection and copying at the Office of General Counsel, United States Department of Energy. Contact Warren Bergholz (252-6975) to make arrangements for inspection and copying.

- (a) Review of National Academy of Science BEIR III Report.
- (b) Occupational Exposure to Ionizing Radiation in the United States - EPA 520/4-80-001.
- (c) NCRP Report No. 39 - "Basic Radiation Protection Criteria".
- (d) DOE/EV-0045 (Rev 2-81) "Study of Anticipated Impact on DOE Programs from Proposed Reductions to the External Occupational Radiation Exposure Limits".
- (e) ICRP Publication No. 26 - "Radiation Protection," ICRP Publication No. 30 - "Limits for Intakes of Radionuclides by Workers".

UNITED STATES OF AMERICA

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Department of Energy

PROJECT MANAGEMENT CORPORATION and.)

TENNESSEE VALLEY AUTHORITY .)

DOCKET NO. 50-537

AFFIDAVIT OF Edward Vallario, being duly sworn, deposes and
says as follows:

1. That he is employed as Manager, Health Physics Program, Office of Nuclear Safety, U.S. Department of Energy, and that he is duly authorized to answer interrogatories numbered II.2 and II.3 in the Sixteenth set.
2. That the above-mentioned and attached answers are true and correct to the best of his knowledge and belief.

Signature

SUBSCRIBED and SWORN to before me this 16 day of 4, 1982.

Rafael A. C. [illegible]
Notary Public

My Commission expires July, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
UNITED STATES DEPARTMENT OF ENERGY
PROJECT MANAGEMENT CORPORATION
TENNESSEE VALLEY AUTHORITY
(Clinch River Breeder Reactor Plant)

Docket No. 50-537

CERTIFICATE OF SERVICE

Service has been effected on this date by personal
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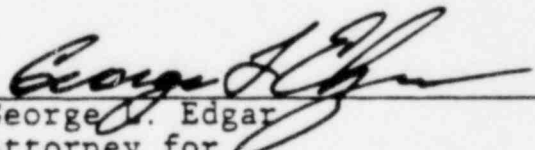
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DATED: April 20, 1982

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