

RELATED CORRESPONDENCE

June 17, 1982

JUN 22 1982  
257

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD

Before Administrative Judges:  
Marshall E. Miller, Chairman  
Gustave A. Linenberger, Jr.  
Dr. Cadet H. Hand, Jr.

In the Matter of )  
)  
)

UNITED STATES DEPARTMENT OF ENERGY )  
PROJECT MANAGEMENT CORPORATION )  
TENNESSEE VALLEY AUTHORITY )

(Clinch River Breeder Reactor Plant) )  
)

Docket No. 50-537

RESPONSE OF INTERVENOR  
CITY OF OAK RIDGE  
TO NRC STAFF THIRD SET OF  
INTERROGATORIES  
TO THE CITY OF OAK RIDGE

Pursuant to 10 CFR §2.740b, and in accordance with the Board's  
February 11, 1982, Order, the City of Oak Ridge hereby responds to the  
Third Set of Interrogatories to the City of Oak Ridge dated June 3,  
1982.

INTERROGATORY

25. Describe the City of Oak Ridge's Zoning Ordinance. In lieu of  
answering this interrogatory, provide two copies of the City's  
Zoning Ordinance.

RESPONSE

25. Two copies of the Oak Ridge, Tennessee, Zoning Ordinance are herewith

DS 03

provided. The ordinance is currently undergoing a comprehensive review and revision. Revised copies will be forwarded as appropriate following final adoption.

INTERROGATORY

26. What are the City of Oak Ridge's ordinances or regulations regarding the use of mobile homes as residences? In lieu of answering this interrogatory, you may provide two copies of the City's ordinances or regulations regarding the use of mobile homes as residences.

RESPONSE

26. The City's Zoning Ordinance includes Section 6-112, Definitions Pertaining to Mobile Homes and Travel Trailers, and Section 6-721, MH-1 Mobile Home Park District. See copies of the complete Zoning Ordinance, Response to Interrogatory 25.

INTERROGATORY

27. Describe all road improvements referred to in the City's response to Interrogatory 19. In particular, identify the road being improved, the nature of the improvement, the location of the improvement, expected completion date, total road miles affected by each improvement project, and any estimates of road capacity increases due to the improvements. Identify the location of each road improvement on a map of the City.

RESPONSE

27. Road improvements in the area in which CRBR is to be located include the major improvement at the intersection of State Routes 58 and 95, the Oak Ridge Turnpike and Whitewing Road. This "T" intersection is being improved by adding an overhead ramp to eliminate at-grade crossing movements. Some 0.83 miles on State Route 58 and 1.52

miles on State Route 95 are affected. The Tennessee Department of Transportation reports that average daily traffic via this improvement is expected to increase from 7,800 in 1981 to a projected 14,000 in 2001, or a 79.5% increase in vehicles per day. This project will only affect the traffic flow north and east of the CRBR site. A map showing the project's location is attached.

#### INTERROGATORY

28. According to the City's May 26, 1982, Answer to the Staff's Interrogatory 24, 292.78 acres out of a total 813.73 acres zoned for industrial use are actually occupied by industrial uses. In light of the substantial under-utilization of industrial-zoned land, explain why the City believes there will be a tax revenue "loss" resulting from the commitment of the Clinch River site to the CRBR project.

#### RESPONSE

28. The City does not necessarily agree with the Staff's conclusion of "substantial under-utilization of industrial-zoned land" in Oak Ridge. It is necessary to have a variety of vacant, properly zoned sites of various sizes, provided with necessary utilities, when a city is actively searching for additional industry. The time necessary to rezone land and extend utilities to an improperly zoned and under-served site is so long as to discourage most industrial prospects. It is true that certain industrially zoned lands in Oak Ridge, for example, one parcel of 158.21 acres, may be too steep and rocky for practical industrial use. This particular site, for example, overlooks a warehouse area and sewage treatment plant. It appears both unattractive and expensive for residential

development; but also it is poorly located for commercial use. Another site, 94.2 acres, is being held by a large high-technology corporation for possible expansion in the next few years. Other sites in the city are now vacant, but zoned for industry and awaiting the accumulation of resources to provide water, sewer, and improved access. A single industry with need for a large site could reduce the City's inventory of allegedly "under-utilized" industrially zoned land at any time by making a single corporate decision. This is in fact one of the City's major economic development objectives.

As noted in the City's Response No. 8, the distribution of property tax burden between the residential and the industrial/commercial sectors is already skewed severely relative to over 100 other Tennessee cities. Resources to finance local governments are severely limited. Any industrial/commercial development that is exempt from local property taxes thus represents a loss, when compared to the same development or even a lesser development if it were taxable.

## RESPONSES TO REQUESTS FOR ADMISSIONS

The following responses relate to the Staff's request for admissions which immediately follow these interrogatories.

Pursuant to 10 CFR §2.742, the City of Oak Ridge hereby responds to Request for Admissions by the City of Oak Ridge:

### REQUEST

1. The NRC Staff has adequately analyzed the environmental and socio-economic impacts associated with the CRBR in its Final Environmental Statement ("FES"), dated February 1977, up to the date of publication of the FES.

### RESPONSE

1. The City denies that NRC Staff's analysis of the environmental and socio-economic impacts associated with the CRBR is "adequate." The analysis is generally accurate as far as it goes, but omits a major component, which is the recognition of inequities in the support of local governments due to avoidance of property tax and other tax payments by one owner of very substantial local properties, the U. S. Government. Other utilities and businesses with local property investments make such payments, and the system available to finance local government in Tennessee relies upon such taxing power. To the extent that such revenues are not available to local governments, local fiscal structures are distorted, and local governments are less able to compete for additional private investments that would tend to improve the locality's situation. To the extent that such

revenues become available through each new institution moving into the jurisdiction, local inequities are lightened, the investment climate brightens for other industries and businesses, and the future of the locality is better assured.

The analysis of inequity to localities resulting from property tax immunity, and the benefits of strengthened local government when payments are made equivalent to such taxes, are well set forth in "Payments in Lieu of Taxes on Federal Real Property," Advisory Commission on Intergovernmental Relations, Washington, D. C., September 1981, A-90.

#### REQUEST

2. The proposed CRBR site consists of 1364 acres owned by the U. S. Government, and is presently in the custody of the Tennessee Valley Authority ("TVA").

#### RESPONSE

2. Admitted.

#### REQUEST

3. The CRBR site is located in Roane County, Tennessee, about 22 miles west of the city of Knoxville. Nearby cities are Kingston, 7 miles west of the CRBR site; Harriman, 10 miles west-northwest; and Oak Ridge, 9 miles northeast.

#### RESPONSE

3. Denied. The City of Oak Ridge is not 9 miles away northeast. The CRBR site is within the City and is as much inside the City of Oak Ridge as it is inside Roane County, Tennessee. The residential portions of Oak Ridge are located to the northeast of the site.

There is privately owned industrial land immediately adjacent to the CRBR site. There is privately owned land zoned for residences within 3.6 miles of the site, measured "property corner to property corner," in a northeast direction. The geographic "center of population" of Oak Ridge (based on the 1970 Census) is located 11.0 miles northeast of the CRBR building.

This information is readily available from U. S. Geological Survey 1:24,000 maps; from the 1:24,000 map entitled "Oak Ridge Area," S-16A (1974) available from the Tennessee Valley Authority; from City of Oak Ridge Zoning and Property maps; and from the 1970 U. S. Census block statistics.

REQUEST

4. The CRBR site is zoned Industrial 2 by the City of Oak Ridge, and is located in the southwestern corner of the City of Oak Ridge.

RESPONSE

4. Admitted.

REQUEST

5. The Clinch River Consolidated Industrial Park, consisting of approximately 112 acres, is adjacent to the north boundary of the CRBR plant site.

RESPONSE

5. Admitted.

REQUEST

6. Within a 50 mile radius of CRBR, Knoxville and Oak Ridge are the largest cities, with 1980 populations of 183,139 and 27,662 respectively.

RESPONSE

6. Admitted.

REQUEST

7. The 1980 resident populations within a 10 and 50 mile radius of the CRBR are 52,040 and 830,840 respectively. The 2030 resident populations are estimated to be 67,580 and 933,280 respectively.

RESPONSE

7. Neither admitted nor denied. The City is not in a position to perform regional population analyses beyond its borders for areas for which census figures are not collected. The City has not estimated its population beyond 1990, other than to say that the estimate for 1995 and 2000 would be the same as for 1990. The City would place low reliance on any figure more than 15-20 years beyond the present, particularly for a small area.

REQUEST

8. The 1980 resident equivalent population within 10 miles of the CRBR, which is defined by the Staff as the sum of the 1980 resident population and the transient, visitor, and commuter population travelling into the area, is 19,640. The 2030 resident equivalent population is estimated to be 30,738.

RESPONSE

8. Neither admitted nor denied on the same basis as response to Request 7.

REQUEST

9. Anderson, Knox, Loudon and Roane counties, which are expected to experience the bulk of the impact due to construction and operation of CRBR, have a combined 1980 population of 464,018. The 2030 population for these four counties is estimated to be 523,252.



RESPONSE

9. Neither admitted nor denied on the same basis as response to Request 7. The 1980 combined populations of Knox, Loudon, Roane, and Anderson counties is admitted as totalling 464,018.

REQUEST

10. The City of Oak Ridge represents about 50 percent of the population of Anderson County.

RESPONSE

10. Denied. The Anderson County portion of Oak Ridge in 1980 included 37.6% of the total Anderson County population. The Roane County portion of Oak Ridge in 1980 included 4.9% of Roane County's people. City residents are found in both counties.

REQUEST

11. Per capita income averages of Anderson and Knox counties are above those of Loudon and Roane counties, as well as for the State of Tennessee.

RESPONSE

11. Neither admitted nor denied. The City staff has not yet received income data from the 1980 Census that would address this supposition.

REQUEST

12. Existing residents of the four counties of Anderson, Knox, Loudon and Roane would supply most of the demand for construction workers for CRBR, through release of workers from other construction projects, movement of workers as they are bid away from other industries, and a decline in unemployment.

RESPONSE

12. Admitted.

REQUEST

13. The Applicants have analyzed socio-economic impacts based upon 26 percent, and 40 percent immovement of construction labor. These figures are based on TVA experience in nuclear power station construction.

RESPONSE

13. Admitted.

REQUEST

14. Applicants adopted an employment multiplier value of 1.6, which reflects the temporary nature of impacts associated with the construction of CRBR. This employment multiplier is appropriate for estimating the secondary employment generated by CRBR construction.

RESPONSE

14. Neither admitted nor denied. The City has no comment on the appropriateness of a 1.6 employment multiplier. Use of a range, as with the uncertainty between 26% and 40% immovement of construction labor, would give a better indication that this is an assumption, and would clarify the extent of uncertainty of the number.

REQUEST

15. Applicants assumed that additional indirect employment generated by CRBR construction would not result in the in-migration of workers. Therefore, total levels of immovement would not be affected by the number of indirect jobs created.

RESPONSE

15. Admitted, as to the assumption of the applicants.

REQUEST

16. At an in-movement level of 26 percent, up to 1300 direct employees may move into the four-county impact area during the peak year of construction. At an in-movement level of 40 percent, that figure would be 1600.

RESPONSE

16. Admitted, as to the effect of the applicants' assumptions.

REQUEST

17. TVA studies indicate that 70 percent of the employees moving into an area are accompanied by their families, which contain 3.2 persons on average. It is reasonable to believe that these estimates would apply to workers for the CRBR.

RESPONSE

17. Admitted. Again, use of a range would clarify the size of the uncertainty that exists concerning a single assumption (70% and 3.2 persons per family).

REQUEST

18. Assuming the factors described in Admissions 13 through 18, the total number of in-movers would be 3200, assuming a 26 percent in-movement level. At a 40 percent in-movement level, the total number of in-movers would be 5040.

RESPONSE

18. Admitted, as to conclusions following from the applicants' assumptions.

REQUEST

19. Table 8.3-3 of the Applicants' Environmental Report ("ER") accurately summarizes the estimated number and location of relocating CRBR employees, and children of school age at the peak of construction

activity.

RESPONSE

19. Neither admitted nor denied. The City staff would have to repeat the estimating procedure to determine its accuracy. The City is prepared to admit that the estimates represent a reasonable order of magnitude.

REQUEST

20. Table 8.3-4 and Appendix Table 2.1-8 of the CRBR ER accurately summarizes the estimated types and location of residence of relocating CRBR employees.

RESPONSE

20. Neither admitted nor denied as to accuracy, as with Request 19. The City is prepared to admit that the estimates are reasonable.

REQUEST

21. Knox County would experience the greatest demand for housing, and Roane County would experience the greatest demand for mobile home sites, should the CRBR be constructed.

RESPONSE

21. Neither admitted nor denied. This appears to be another reasonable estimate, but actual experience will depend on circumstances affecting the various localities during the construction period. Such as cost of transportation and/or entrepreneurial activity.

REQUEST

22. Construction workers who do not relocate in order to be employed at the CRBR project would not cause any social impacts, except for possible traffic problems, since they would use the same public and private sector services and resources they have always used.

RESPONSE

22. Admitted.

REQUEST

23. Only the communities of Kingston, Lenoir City, and Oak Ridge would experience housing pressures under both 26 and 40 percent worker in-movement levels.

RESPONSE

23. Neither admitted or denied. This conclusion would hold true under the assumptions, both stated and unstated, of the applicants' study; but under other possible circumstances, such as a decrease in existing employment causing dislocation, their conclusion might not be borne out.

REQUEST

24. The Applicants' analysis of housing impacts in the ER is conservative, since the ER does not consider the following mitigating factors:

- a. in-moving workers unaccompanied by families;
- b. single workers, which typically constitute 30 percent of the total workforce;
- c. use of hotels and motels as transient housing;
- d. doubling-up of single workers in hotels and motels, or other housing.

RESPONSE

24. Admitted.

REQUEST

25. Table 8.1-15 of the CRBR ER accurately presents area school capacity and enrollment figures for counties and school systems for the 1980-81 school year.

RESPONSE

25. Admitted as to Oak Ridge school jurisdiction.

REQUEST

26. The Oak Ridge school system presently has approximately an 18.7 percent excess capacity.

RESPONSE

26. Admitted.

REQUEST

27. Table 8.3-5 and Appendix Table 2.2-8 of the CRBR ER accurately presents area school capacity, enrollment and excess capacity figures for the peak year of CRBR plant construction.

RESPONSE

27. Neither admitted nor denied. The Oak Ridge Schools plans to close one elementary school and make other adjustments at the end of the 1983-84 school year. This will reduce the system's capacity considerably. The peak year of CRBR plant construction is subject to change. Capacity standards in future years are also subject to change, and cannot be determined accurately at this time.

REQUEST

28. During the peak year of CRBR plant construction, the City of Oak Ridge school system will probably experience excess capacity.

RESPONSE

28. It is admitted that the Oak Ridge Schools will have a reduced capacity after 1984, but that the system would still be able to absorb 100 extra pupils.

REQUEST

29. The Applicants' analysis of school system impacts in the CRBR ER, including the data presented in the ER tables, did not consider private schools as a potential resource, which would reduce the impact of CRBR workers' children on the area school systems.

RESPONSE

29. Admitted.

REQUEST

30. The State of Tennessee Department of Public Health has issued age-specific projections of populations which indicate an overall 6 percent decline in school-age children in the four county areas between 1980 and 1985. The State's projections are in conflict with the four county area school authorities, who predict increasing school enrollment.

RESPONSE

30. Neither admitted nor denied. The Oak Ridge Schools have not made a study of projected enrollment in the four-county area. The Oak Ridge Schools are currently projecting a decline in public school enrollment within the Oak Ridge jurisdiction of about 2 percent per year.

REQUEST

31. Table 8.1-18 of the CRBR ER accurately presents the number and location of hospital beds, physicians and dentists in the four county impact area.

RESPONSE

31. Admitted with qualification. While Table 8.1-18 lists a total of 285 licensed hospital beds in Anderson County with 76.0% occupancy

in 1981, the calendar 1981 occupancy for the Oak Ridge Hospital's 265 beds (in Anderson County) was 81.5%, according to records in the hospital administrator's office.

REQUEST

32. Hospitals in the four county area are at most 76 percent occupied.

RESPONSE

32. Denied. See Response to Request No. 31, that the 1981 Oak Ridge Hospital's occupancy was 81.5%.

REQUEST

33. There would be a minimal impact to health care in the four county area attributable to increased needs for health care services by CRBR workers and their families.

RESPONSE

33. Neither admitted nor denied. Local governments are cutting back on health care services and reorganizing them due to cut-backs in available resources, due to inflation and budgetary constraints. In the event of a very tight health care situation due to minimal funding, the projected increase in service need might have a more than "minimal" impact on local health care.

REQUEST

34. Table 8.1-16 of the CRBR ER accurately presents water sources, treatment capacities, and consumption rates for major water supply systems in the CRBR area.

RESPONSE

34. Admitted as to Oak Ridge water supply system.



REQUEST

35. The City of Oak Ridge derives its water from the Clinch River, and its water supply system is operating at about 60% of capacity.

RESPONSE

35. Admitted in part and denied in part. Water distributed by the City of Oak Ridge to its municipal customers is derived from the Clinch River. However, the City does not own its water treatment plant. Rather, the City purchases treated water from a treatment plant owned and operated by the U.S. Government's Department of Energy. The City has no responsibility or authority over the treatment plant's capacity or the requirements of the Government-owned facilities with which it shares the plant's output.

REQUEST

36. One half of the current excess capacity in the four county area water supply systems could supply 150,000 people at a 15 gpd consumption rate. This additional population exceeds by a considerable margin the expected residential population growth from 1980 to the 1985 predicted peak year of construction, plus a 40 percent worker in-movement assumption.

RESPONSE

36. Neither admitted nor denied. The City staff has not made a study of the four-county area's water supply systems. The Department of Energy (DOE)'s water supply and treatment facilities serving the City of Oak Ridge have excess capacity, but the requirements of other DOE facilities in Oak Ridge are beyond the City's jurisdiction.

REQUEST

37. Table 8.1-17 accurately presents wastewater treatment capacities and verage daily flows for major waste water treatment systems in the four-county area.

RESPONSE

37. Denied. The City of Oak Ridge has under construction a new 6 mgd advanced secondary treatment plant, not a 12 mgd plant. The rating refers to sustained treatment capacity, not to short-term peak flows.

REQUEST

38. The City of Oak Ridge's wastewater treatment is operating at about 60% of capacity.

RESPONSE

38. It is admitted that the City of Oak Ridge's new wastewater treatment plant is projected to operate at about 60% of capacity when it goes on line in the Fall of 1982.

REQUEST

39. One half of the existing excess capacity in the four-county area wastewater treatment systems could serve the needs of the anticipated resident of 40 percent construction worker in-mover populations, assuming a 100 gpd per capita service need.

RESPONSE

39. Neither affirmed nor denied. The City staff has made no study of the wastewater treatment capacity in the four-county area.

REQUEST

40. Approximately 528 tons of solid waste area collected and disposed of by the four counties in the CRBR area.

#### RESPONSE

40. Denied. The figures used locally are reported in tons per day or tons per week. No time period is given in Request 40. Figures reporting tons per day under-report the actual collection effort, which is typically spread over a 5-1/2-day or 6-day "week." In 1982 the Waste Management, Inc. landfill in Anderson County, which serves primarily for waste disposal from Knoxville and Knox County, was reported to be typically handling 850 tons per day from Knox County sources (including Knoxville) on the basis of 282 working landfill days per year, according to Waste Management, Inc. sources at the landfill site. Habits of household disposal are subject to change over time and between regions.

#### REQUEST

41. Approximately 10 tons of solid waste or 1 percent of the total solid waste collected in the four-county area, will be generated by the in-movement population, assuming a 40 percent in-movement level. This is an insignificant incremental addition to the solid waste needs of the four-county area.

#### RESPONSE

41. Neither admitted nor denied. The City staff has not studied solid waste collection in the four-county area. It is admitted that additional solid wastes from an estimated 190 new families in the City of Oak Ridge would represent a minor addition to the present solid waste collection workload.

REQUEST

42. Table 8.1-19 accurately presents the number and distribution of law enforcement officers and firemen in the four-county area.

RESPONSE

42. Denied. The City of Oak Ridge employs 42 law enforcement officers, as noted, but its firemen include 40 full-time firemen and 26 "fire specialists," paid on call, instead of the "42 and 0" shown in Table 8.1-19.

REQUEST

43. Expansion of safety services will not be required to accommodate the temporary influx of CRBR workers.

RESPONSE

43. Admitted.

REQUEST

44. The direct project construction payroll is estimated to be \$446.2 million throughout the construction period, in 1981 dollars.

RESPONSE

44. Admitted as an estimate of the applicants, and subject to change.

REQUEST

45. The indirect (induced) employment payroll is estimated to be \$2.5 million throughout the construction period, in 1981 dollars.

RESPONSE

45. Admitted as an estimate of the applicants, subject to change.

REQUEST

46. \$179 million would flow to the private sector, assuming a local expenditure rate of 40 percent.

RESPONSE

46. Admitted as an assumption of the applicants, subject to change.

REQUEST

47. The City of Oak Ridge's general fund revenues attributable to CRBR during the peak year of construction, which includes property, sales, beverage, and miscellaneous tax revenues, is equal to \$8.080 million.

RESPONSE

47. Neither admitted nor denied. The City staff cannot attest to this amount being correct, for a peak year in the future subject to change.

REQUEST

48. The City of Oak Ridge's incremental school fund revenues attributable to CRBR during the peak year of construction, which includes property and sales tax, and State equalization funds, is equal to \$10.180 million, assuming a 26% worker in-movement level.

RESPONSE

48. Neither admitted nor denied. The City staff cannot attest to this amount being correct, for a peak year in the future subject to change.

REQUEST

49. The total incremental revenue collected by the City of Oak Ridge which are attributable to CRBR is equal to \$18.260 million.

RESPONSE

49. Neither admitted nor denied. The City staff cannot attest to the accuracy of such a figure.

REQUEST

50. During the peak year of construction, the City of Oak Ridge will incur approximately \$3.980 million in educational costs, assuming a 26 percent worker in-movement level. The educational costs incurred is \$7.960 million, assuming a 40 percent worker in-movement level.

RESPONSE

50. Neither admitted nor denied. Same basis as response to Request No. 47.

REQUEST

51. During the peak year of construction, the revenue-cost balance for the City of Oak Ridge is \$6,200 million, assuming a 26 percent construction worker in-movement level. The revenue-cost balance is \$7.760 million, assuming a 40 percent worker in-movement level.

RESPONSE

51. Neither admitted nor denied. Same basis as response to Request No. 47.

REQUEST

52. The level of service for all road segments in the CRBR area is the same or higher than the rated service at rush hours when CRBR traffic is on the road.

RESPONSE

52. Admitted.

REQUEST

53. The most noticeable traffic impact during the CRBR construction period will be an extension of peak from 1 to 2 consecutive hours during the peak of construction.

RESPONSE

53. Admitted that this will be the most probable noticeable impact.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF  
U. S. DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

AFFIDAVIT OF WILLIAM DAVID MORRIS

I, William David Morris, being duly sworn, state as follows:

1. I am employed by the City of Oak Ridge as Finance Director.
2. I am duly authorized to participate in answering the June 3, 1982, Request for Admissions, numbers 47 through 51.

Wm. David Morris  
SIGNATURE

Subscribed and sworn to before me this 17th day of June 1982.

Hattie B. Rush  
NOTARY PUBLIC

My Commission Expires:

April 24, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF  
U. S. DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

AFFIDAVIT OF LUCIEN FAUST

I, Lucien Faust, being duly sworn, state as follows:

1. I am employed by the City of Oak Ridge as Director of Planning.
2. I am duly authorized to participate in answering the June 3, 1982, Third Set of Interrogatories, numbers 25 through 28, and Request for Admissions, numbers 2 through 24 and 42 through 53.

Lucien Faust  
SIGNATURE

Subscribed and sworn to before me this 17th day of June 1982.

Jacquelyn J. Bernard  
NOTARY PUBLIC

My Commission Expires:

Oct. 19, 1982



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF  
U. S. DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

AFFIDAVIT OF JAMES D. HARLESS

I, James D. Harless, being duly sworn, state as follows:

1. I am employed by the City of Oak Ridge as Environmental Health Supervisor.
2. I am duly authorized to participate in answering the June 3, 1982, Request for Admissions, numbers 31 through 33 and numbers 40 and 41.

*James D. Harless*

SIGNATURE

Subscribed and sworn to before me this 17<sup>th</sup> day of June 1982.

*Jaquelyn J. Bernard*  
NOTARY PUBLIC

My Commission Expires:

Oct. 19, 1982



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

U. S. DEPARTMENT OF ENERGY

PROJECT MANAGEMENT CORPORATION

Docket No. 50-537

TENNESSEE VALLEY AUTHORITY

AFFIDAVIT OF OLIN RIPLEY

Olin Ripley, being duly sworn, deposes and says as follows:

1. I am employed by the Oak Ridge Board of Education as Attendance and Data Processing Supervisor.
2. I am duly authorized to participate in answering the June 3, 1982, Request for Admissions, numbers 25 through 30.

Olin B. Ripley  
SIGNATURE

Subscribed and sworn to before me this 17th day of June 1982.

My commission expires:

Joquelyn J. Bernard  
NOTARY PUBLIC

Oct. 19, 1982



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF  
U. S. DEPARTMENT OF ENERGY  
PROJECT MANAGEMENT CORPORATION  
TENNESSEE VALLEY AUTHORITY

Docket No. 50-537

AFFIDAVIT OF LOWELL C. STRUNK

I, Lowell C. Strunk, being duly sworn, state as follows:

1. I am employed by the City of Oak Ridge as Director of Public Works.
2. I am duly authorized to participate in answering the June 3, 1982, Request for Admissions, numbers 34 through 39.

Lowell C. Strunk  
SIGNATURE

Subscribed and sworn to before me this 17th day of June 1982.

Hattie B. Ruck  
NOTARY PUBLIC

My Commission Expires:

April 24, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'82 JUN 22 10:23

*WET*

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

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DOCKET NO. 50-537

CERTIFICATE OF SERVICE

Service has been effected by deposit in the United States Mail,  
first class, on this date, the 17th day of June 1982, to the following:

Marshall E. Miller, Esquire  
Chairman  
Atomic Safety & Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20545

Dr. Cadet H. Hand, Jr.  
Director  
Bodega Marine Laboratory  
University of California  
P. O. Box 247  
Bodega Bay, California 94923

Mr. Gustave A. Linenberger  
Atomic Safety & Licensing Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20545

Daniel Swanson, Esquire  
Stuart Treby, Esquire  
Office of Executive Legal Director  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20545

Atomic Safety & Licensing Appeal Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20545

Atomic Safety & Licensing Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20545

Docketing & Service Section  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20545

The Honorable William M. Leech, Jr., Attorney General  
The Honorable William B. Hubbard, Chief Deputy  
Attorney General  
The Honorable Lee Breckenridge, Assistant Attorney General  
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Office of the Attorney General  
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Nashville, Tennessee 37219

Oak Ridge Public Library  
Civic Center  
Oak Ridge, Tennessee 37830

Herbert S. Sanger, Jr., Esquire  
Lewis E. Wallace, Esquire  
W. Walter LaRoche, Esquire  
James F. Burger, Esquire  
Edward J. Viglucci, Esquire  
Office of the General Counsel  
Tennessee Valley Authority  
400 Commerce Avenue  
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Dr. Thomas Cochran  
Ms. Barbara A. Finamore  
Natural Resources Defense Council  
1725 Eye Street, N.W., Suite 600  
Washington, D. C. 20006

Mr. Joe H. Walker  
401 Roane Street  
Harriman, Tennessee 37748

Ms. Ellyn R. Weiss  
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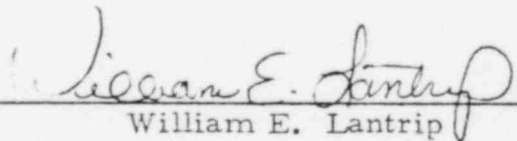
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