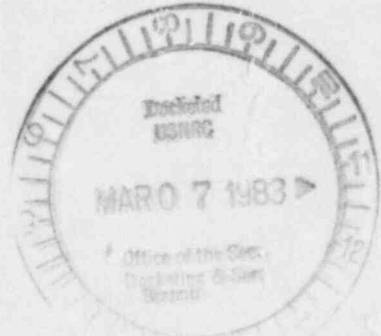


UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD



\_\_\_\_\_  
In the Matter of )  
 )  
 )  
PUBLIC SERVICE COMPANY OF NEW )  
HAMPSHIRE, et al. )  
 )  
(Seabrook Station, Units 1 & 2) )  
\_\_\_\_\_ )

Docket Nos. 50-443 OL  
50-444 OL

APPLICANTS' ANSWERS TO "NECNP MOTION  
TO COMPEL ANSWERS BY APPLICANTS TO  
NECNP THIRD SET OF INTERROGATORIES ON  
CONTENTIONS I.A.2, I.B.1, I.B.2 AND I.C"

Pursuant to 10 CFR §§ 2.730(c) and 2.740(f), the  
Applicants' hereby answer the "NECNP Motion to Compel  
Answers by Applicants to NECNP Third Set of  
Interrogatories on Contentions I.A.2, I.B.1, I.B.2 and  
I.C" served upon them by NECNP on February 16, 1983.

Interrogatory No. 7

By this interrogatory, NECNP asked the Applicants  
to describe a certain process "in detail." The process

DS03

referred to, however, is an ongoing, evolutionary process the commencement of which long antedated the drafting of word one on the Seabrook construction permit application: namely, the decision making process by which determinations have been made as to which equipment is "safety related" and which is not. Bearing in mind that the term safety-related means being necessary to the performance of certain functions (see 10 CFR Part 100, Appendix A), to a certain extent the question of what equipment and systems in any nuclear power reactor are safety-related is generic. Likewise, the question of what systems and equipment in a particular manufacturer's PWR are safety-related is also to a certain extent generic to that manufacturer. These generic propositions necessarily serve as starting points; they may, as well, survive as ultimate conclusions, at least as to some systems. Finally, when the process begins of designing a particular reactor, the question of whether certain equipment and systems are safety-related is obvious; one needs, for example, no detailed analysis or study to conclude that the reactor pressure vessel meets this test.

As the design process progresses, the engineers have before them both the emerging design and whether particular pieces have theretofore been considered safety-related. Should someone feel an item not so considered should be, or that an item considered safety-related is not, then the question is reconsidered -- and potentially it is considered and reconsidered each time an engineer contemplates each component of the plant. There is no way this process can be described "in detail" beyond noting that at each point (or, perhaps more accurately, continuously) the thought process involves a comparison of the function of the equipment or system in question and the definition of what constitutes safety-related as provided by the regulations.

As a result of the nature of the process that NECNP wanted described, therefore, an answer in more "detail" was not possible -- nor, indeed, could answer such "detailed" answer be meaningful. No doubt the engineers could describe -- in as much detail as might be desired -- why some particular item is or is not considered safety related, if a more precise question were posed. The Applicants would be happy to explain

why any particular itm is or is not considered safety-related, if NECNP will specify what it has in mind; and the Applicants did answer the only specific aspect contained in the interrogatory, namely, whether a probabilistic risk assessment was used as a part of the safety-related decisionmaking syllogism.

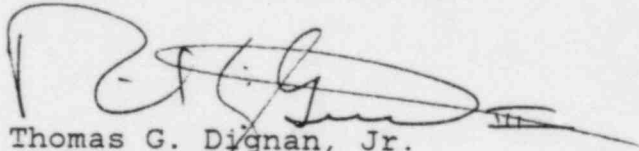
Beyond this, however, no further "detail" to this question, as framed, was or is possible; the difficulty, we submit, lies with the question and not with the answer.

Interrogatory No. 17

There is a condition precedent that must be met by one who insists on a "yes" or "no" answer to a question: he must propound a question susceptible of a simple "yes" or "no" answer. This interrogatory asked a question about inspection and maintenance durations of a long list of items, framed, however, in terms that implied -- contrary to fact -- that a single such duration applied to all the items on the list. The fact of the matter, as the Applicants' answer reflects, is that different durations apply, depending on the different recommendations of the different manufacturers of the different items.

An interpretational problem does, however, now seem obvious with respect to this interrogatory. The Applicants interpreted "yearly" to equate with "periodic," in which case no answer to sub-part (a) beyond that given was called for. NECNP, however, appears to have meant "yearly" to mean precisely "calling for a period equal to or less than 365.25 days." Given this interpretation, a further answer to sub-part (a) is called for, which the Applicants will supply as quickly as possible.

Respectfully submitted,



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Dated: February 28, 1983

CERTIFICATE OF SERVICE

I, Robert K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on February 28, 1983, I made service of the within "Applicants' Answers to 'NECNP Motion to Compel Answers by Applicants to NECNP Third Set of Interrogatories on Contentions I.A.2, I.B.1, I.B.2 and I.C'" by mailing copies thereof, postage prepaid, to:

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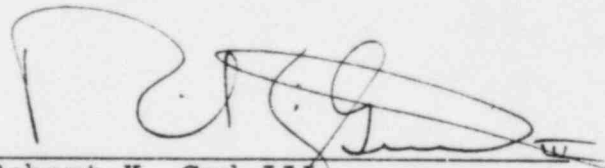
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