

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
Philadelphia Electric Company)	Docket Nos. 50-352
)	50-353
(Limerick Generating Station,)	
Units 1 and 2))	

APPLICANT'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF
DOCUMENTS TO MARVIN I. LEWIS

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740b, and the Atomic Safety and Licensing Board's Memorandum and Order Confirming Schedules Established During Prehearing Conference (May 16, 1983), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatories to Marvin I. Lewis to be answered fully in writing, under oath, in accordance with the definitions and instructions below.

Additionally, pursuant to 10 C.F.R. §2.741, Applicant requests that intervenors produce for inspection and copying (or provide copies of) those documents designated by intervenors in their respective answers below.

Definitions and Instructions

1. For each interrogatory, please state the full name, work address, and title or position of each person providing information for the answer to the interrogatory.

2. The following definitions shall apply:

- a. "Intervenor" shall refer to Marvin I. Lewis or any officer, member, employee or consultant thereof.
- b. "Document" shall mean any written, printed, typed or other graphic matter of any kind or nature, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of intervenor, or its officials, employees, or agents; it shall also mean all copies or drafts of documents by whatsoever means made.
- c. "Date" shall mean the exact day, month and year, if ascertainable, or, if not ascertainable, the best approximation (including the event's relationship to other events in the relevant context of the interrogatory).
- d. "NRC" or "Commission" shall mean either the Atomic Energy Commission or the Nuclear Regulatory Commission, as appropriate, including its regulatory staff and adjudicatory boards, as indicated by the context of the interrogatory.
- e. "Specify", when referring to a proceeding before the Nuclear Regulatory Commission, means that the answer shall set forth the proceeding, applicant, docket number,

relevant date, and any other descriptive information appropriate to the request.

- f. "Specify" or "identify", when referring to an individual, corporation, or other entity, means that the answer shall set forth the name, present or last known work address, and, if a corporation or other entity, its principle place of business or, if an individual, his or her title or titles and employer. Once an individual corporation or other entity has been thus identified in answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation or other entity to state merely his, her or its name.

3. These interrogatories request all knowledge and information in intervenor's possession and/or knowledge and information in the possession of intervenor's agents, representatives, consultants, and, unless privileged, attorneys.

Interrogatories

1. State whether you intend to present any expert witnesses on the subject matter at issue in Contention I-62. If so, identify each such expert witness and further state (a) his professional qualifications; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is

expected to testify; (d) the grounds for each opinion. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this (these) subject(s).

2. Identify by title, author, publisher and date of issuance or publication, all documents that you rely upon as a basis for your contention or that you intend to use (by way of reference or evidentiary proffer) in presenting your direct case on Contentions I-62 and all documents to which you intend to refer in conducting cross-examination of other witnesses who may testify in connection with any such contention(s).

3. To the extent that your answer to any interrogatory is based upon one or more documents, (a) identify each such document on which your answer is based; (b) identify the specific information in such document upon which you rely; (c) explain how such information provides a basis for your answer.

4. To the extent that your answer is based upon any study, calculation, research or analysis, (a) describe the nature of the study, calculation, research or analysis and identify any documents which discuss or describe the study, calculation, research or analysis; (b) identify the person(s) or entity(ies) who performed the study, calculation, research or analysis; (c) describe in detail the information which was the subject of the study, calculation, research or analysis; (d) describe the results of such study,

calculation, research or analysis; (e) explain how such study, calculation, research or analysis provides a basis for your answer.

5. To the extent that your answer is based upon conversations, consultations, correspondence or other communications with one or more individuals or entities, (a) identify each such individual or entity; (b) state the educational and professional background of each such individual, including occupation and institutional affiliations; (c) describe the nature of each communication, including time and context, and describe the information received from each such individual or entity; (e) explain how such information provides a basis for your answer.

Contention I-62

6. Specify all applicable NRC regulations, General Design Criteria or other regulatory requirements or guidance, or portions thereof, pertaining to pressurized thermal shock which intervenor asserts are applicable to Limerick.

7. Specify each section of the Limerick Final Safety Analysis Report ("FSAR"), including Applicant's response to Staff questions, which intervenor asserts may be relevant to the consideration of pressurized thermal shock and specify, to the extent applicable, any failure to meet the regulatory requirements set forth in response to Interrogatory 6 above.

8. Define the term pressurized thermal shock as used in Contention I-62.

9. Describe in detail the basis for intervenor's assertion, if so, that pressurized thermal shock is a concern for a boiling water reactor ("BWR") in general, and Limerick in particular. In particular, specify the operational mode or modes for Limerick and the exact sequence of events which intervenor asserts would produce pressurized thermal shock including the exact conditions of high pressure, the source, quantity and duration of cold water which is alleged to be introduced into the reactor vessel as well as the amount of radiation embrittlement of the vessel wall which is required to be present.

10. Aside from the reactor pressure vessel, describe all systems components or structures which intervenor alleges may be directly affected by pressurized thermal shock at the Limerick facility.

11. Describe the neutron flux which intervenor asserts would have to exist in the Limerick reactor vessel in order for the vessel to be substantially affected by radiation embrittlement.

12. Describe the calculational techniques and assumptions used, including core geometry, fuel fluence and locations of the most critically affected areas, identifying such locations as base or weld metal.

13. Describe in detail any incidents known to intervenor of pressurized thermal shock at BWR's, including any documentary sources within the NRC or nuclear industry

identifying pressurized thermal shock as a problem for BWR's.

14. To the extent not already addressed in response to previous interrogatories, state in detail all facts upon which intervenor relies in support of this contention.

Request for Production of Documents

Please attach to your answer(s) to the interrogatories listed above a copy of all documents applicable to such answer(s), or upon which you otherwise intend to rely in the presentation of your direct case or in the cross-examination of other witnesses. Alternatively, state that all such documents will be produced at a reasonable time and place to be agreed upon by the Applicant for inspection and copying.

CONNER & WETTERHAHN, P.C.



Troy B. Conner, Jr.
Mark J. Wetterhahn
Robert M. Rader

Counsel for the Applicant

June 3, 1983

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's First Set of Interrogatories and Request for Production of Documents to Air and Water Pollution Patrol," "Applicant's First Set of Interrogatories and Request for Production of Documents to Friends of the Earth," and "Applicant's First Set of Interrogatories and Request for Production of Documents to Marvin I. Lewis," dated June 3, 1983, in the captioned matter have been served upon the following by deposit in the United States mail this 3rd day of June, 1983:

Judge Lawrence Brenner (2)	Docketing and Service Section
Atomic Safety and Licensing	Office of the Secretary
Board	U.S. Nuclear Regulatory
U.S. Nuclear Regulatory	Commission
Commission	Washington, D.C. 20555
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Commission	Legal Director
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	Commission
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Atomic Safety and Licensing	Board Panel
Board	U.S. Nuclear Regulatory
U.S. Nuclear Regulatory	Commission
Commission	Washington, D.C. 20555
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Atomic Safety and Licensing	Philadelphia Electric Company
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* By Federal Express

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