

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)
DUKE POWER COMPANY, et al.) Docket Nos. 50-413
(Catawba Nuclear Station,) 50-414
Units 1 and 2))

APPLICANTS' INTERROGATORIES AND REQUESTS
TO PRODUCE TO CAROLINA ENVIRONMENTAL STUDY GROUP
AND PALMETTO ALLIANCE REGARDING PALMETTO ALLIANCE'S
AND CAROLINA ENVIRONMENTAL STUDY GROUP'S
DES CONTENTIONS 11, 17 AND 19

Pursuant to 10 C.F.R. §§2.740b and 2.741, Duke Power Company, et al. ("Applicants") hereby serve Applicants' Interrogatories and Requests to Produce upon Intervenor Palmetto Alliance and Carolina Environmental Study Group ("CESG"). These interrogatories involve Palmetto Alliance and CESG's joint DES Contentions 11, 17 and 19.

Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to CESG/Palmetto Alliance, its officers, directors or members as well as any pertinent information known to its employees, advisors, representatives or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of CESG/Palmetto Alliance, its officers, directors or members as well as its employees, advisors, representatives or

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counsel. In answering each interrogatory and in responding to each request, recite the interrogatory or request preceding each answer or response. Also, identify the person providing each answer or response.

These interrogatories and requests shall be continuing in nature. Thus, any time CESC/Palmetto Alliance obtains information which renders any previous response incorrect or indicates that a response was incorrect when made, CESC/Palmetto Alliance should supplement its previous response to the appropriate interrogatory or request to produce. CESC/Palmetto Alliance should also supplement its responses as necessary with respect to identification of each person expected to be called at the hearing as a witness, the subject matter of his or her testimony, and the substance of that testimony. Applicants are particularly interested in the names and areas of expertise of CESC/Palmetto Alliance witnesses, if any. Identification of such witnesses is necessary if Applicants are to be afforded adequate time to depose them. The term "documents" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. We request that at a date or dates to be agreed upon, CESC/Palmetto Alliance make available for inspection and copying all documents subject to the requests set forth below.

REQUESTS FOR DOCUMENTS

Pursuant to 10 C.F.R. §2.741, Applicants request CESC and Palmetto Alliance by and through their representative or attorney to make available for inspection and copying, at a time and location to be designated, any and all documents of whatsoever description identified in the responses to the Applicants' interrogatories below; including, but not limited to:

- (1) any written record of any oral communication between or among Intervenor, their advisors, consultants, agents, attorneys, and/or any other persons, including but not limited to the NRC Staff, the Applicants, and their advisors, consultants, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letters, memoranda, notes, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to work papers, prior drafts, and notes of meetings.

If CESC or Palmetto Alliance maintains that some documents should not be made available for inspection, they should specify the documents and explain why such are not being made available. This requirement extends to any such documents, described above, in the possession of CESC or Palmetto Alliance, their advisors, consultants, representatives, or attorney.

INTERROGATORIES

Pursuant to 10 C.F.R. §2.740b, the Applicants request CESC and Palmetto Alliance by and through their representative or attorney to answer separately and fully in writ-

ing, under oath or affirmation, by persons having knowledge of the information requested, the following interrogatories.

A. General Interrogatories

The following interrogatories apply severally to each of the contentions admitted as issues in controversy in this proceeding.

1. State the full name, address, occupation and employer of each person answering the interrogatories and designate the interrogatory or the part thereof he or she answered.
2. Identify each and every person you are considering calling as a witness at the hearing in this matter on this contention, and with respect to each such person:
 - a. State the substance of the facts and opinions to which the witness is expected to testify;
 - b. Give a summary of the grounds for each opinion; and
 - c. Describe the witness's educational and professional background.
3. Is the contention based on one or more calculations? If so;
 - a. Describe each calculation and identify any documents setting forth such calculation.
 - b. Indicate who performed each calculation.
 - c. Indicate when each calculation was performed.
 - d. Describe each parameter used in such calculation and each value assigned to the parameter, and describe the source of your data.
 - e. Indicate the results of each calculation.
 - f. Explain in detail how each calculation provides a basis for the issue.

4. Is the contention based upon conversations, consultations, correspondence or any other type of communications with one or more individuals? If so:
 - a. Identify by name and address each such individual.
 - b. State the educational and professional background of each such individual, including occupation and institutional affiliations.
 - c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
 - d. Describe the information received from such individuals and explain how it provides a basis for the issue.
 - e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence, or other communication with such individual.

B. Specific Interrogatories Relating To
CESG/Palmetto Alliance DES Contention 11¹

1. What is the basis for your statement that "[a] substantial part of the population placed at risk by nuclear operations at and relating to Catawba are also placed at risk by similar operations at McGuire," and, therefore, that "[a] realistic assessment of Catawba impacts will take into consideration McGuire risks"? Explain your answer fully.
2. What do you mean by "a substantial part of the population" as that term is used in this contention?
3. What do you mean by "placed at risk" as that term is used in this contention?

¹ DES Contention 11 was admitted by the Board in its Memorandum and Order of March 24, 1983. As revised by the Board, DES Contention 11 now reads as follows:

A substantial part of the population placed at risk by nuclear operations at and relating to Catawba are also placed at risk by similar operations at McGuire. A realistic assessment of Catawba impacts will take into consideration McGuire risks.

4. Is the phrase "placed at risk" meant to refer only to the risk of severe accidents or does it refer to the risk of both design basis and severe accidents?
5. If "placed at risk" refers to risk of both design basis and severe accident can you quantify the risk associated with these accidents? If so, please provide, together with supporting documentations and calculations.
6. Please explain what are in your opinion the geographical boundaries of the population allegedly "placed at risk" by the operation of McGuire and by the operation of Catawba.
7. What do you mean by "nuclear operations at and relating to Catawba" as that term is used in this contention?
8. What do you mean by "similar operations at McGuire" as that term is used in this contention?
9. What do you mean by "Catawba impacts" as that term is used in this contention?
 - (a) Does this term include both the environmental and health effects projected to be associated with the operation of the Catawba nuclear station? Explain your answer whether your response is affirmative or negative.
10. What do you mean by the term "McGuire risks" as that term is used in this contention?
11. What are your bases for your responses to interrogatories 1 through 10? Identify any documents, calculations, testimony or oral statements and any legal requirements or guidelines on which you rely.
12. What do you mean by "realistic assessment" as that term is used in this contention?
13.
 - (a) Is the term "realistic assessment" intended to be synonymous with an adequate NEPA analysis?
 - (b) Do you contend that the DES does not "realistically" assess the environmental impacts of operating the Catawba Nuclear Station? Explain your answer.

14. Do you contend that the DES/FES's² assessment of "Catawba impacts" (i.e., the environmental impact of the Catawba Nuclear Station) completely fails to take into consideration the possible effect of "McGuire risks"? Explain your answer.
15. If your response to the preceding interrogatory is negative do you contend that the DES/FES's assessment of "Catawba impacts" fails to place sufficient emphasis upon projected "McGuire risks"? Explain your answer.
16. If your answer to interrogatories 13 and 14 is negative, do you contend that the DES/FES's assessment of the environmental impacts estimated to be associated with the operation of Catawba is otherwise inadequate or incorrect? Explain your answer.
17. If your answer to any of the three preceding interrogatories is affirmative, please identify (making reference to particular calculations or data) those aspects of the "McGuire risk" which in your opinion should have been considered in the Catawba DES/FES, and explain the type of consideration which these elements should receive in a proper calculation of the risk of operating Catawba.
18. Do you contend that the NRC Staff is required by any regulation, regulatory guide, policy statement, or other authority to consider "McGuire risks" in assessing the environmental impact projected to be associated with the operation of Catawba? If so, identify all such requirements.
19. Do you contend that NEPA requires some recognition of potential environmental risks posed by other nuclear facilities in the area in assessing the environmental "cost" of Catawba? Explain your answer.
20. What are your bases for your responses to interrogatories 12 through 19? Identify any documents, calculations, testimony or oral statements and any legal requirements or guidelines on which you rely.

² Applicants have characterized DES Contentions 11, 17 and 19 as DES/FES contentions. These interrogatories are designed to elicit your various specific concerns regardless of which of these two documents that concern may be reflected in. We believe that the DES has been superceded by the FES and that the FES is now the operative document.

21. Do you contend that the accident probabilities and projected dose releases listed in Table 5.10 of the DES/FES are incorrect because they do not take into account the possible incremental risks posed by the concurrent operation of the McGuire and Catawba plants? Explain your answer.
22. (a) If your answer to the preceding interrogatory is affirmative, please specify the statistical values which the Catawba DES/FES should reflect for incremental accident risks which result from the operation of McGuire. What is the basis for your answer?

(b) What effect do you contend the "incremental risk" from McGuire should have upon the accident probabilities and projected radiation doses in the Catawba DES/FES? In other words, specify the extent to which these probabilities and projected doses should be increased in order to accurately reflect the risk of concurrent operation of McGuire and Catawba. What is the basis for your answer?
23. Do you contend that proper consideration of "McGuire risks" in assessing the effects of operating the Catawba plant would affect the DES's conclusion that "the risk of incurring any adverse health effects as a consequence of [design-basis or severe accidents] is exceedingly small"? (DES/FES, p. 5-35). Explain the basis for your answer, making reference to any documents, as well as calculations you have to support your answer.
24. Do you contend that a "realistic assessment of Catawba impacts" entailing consideration of any incremental risks posed by the operation of McGuire would reveal such substantial risks (i.e., "costs") to public health and safety that the DES/FES's overall cost-benefit conclusion would be affected? Explain your answer.
25. If your answer to the preceding interrogatory is affirmative, do you contend that the additional environmental "cost" (i.e., risk) created by the concurrent operation of the McGuire and Catawba plants is sufficient to tip the cost-benefit balance against operation of Catawba? Please explain and provide the basis for your answer.

26. If you contend that the operation of the McGuire plant imposes an additional environmental cost upon the operation of the Catawba plant, do you agree that the concurrent operation of these two plants also creates an increased environmental benefit?
27. In an October 18, 1982 letter to the Board in this proceeding, the NRC Staff indicated in response to a Board question that the "risk of severe accidents occurring at McGuire is not considered in the Catawba Environmental Impact Statement as a matter of policy," adding that:

The analysis of severe accidents performed for purposes of the EIS is directed only to the incremental costs of beyond design basis accidents for the proposed action, in this case the licensing of Catawba. This comports with the Commission's Statement of Interim Policy, 45 Fed. Reg. 40101 (June 13, 1980) (the EIS should contain 'reasoned consideration of the environmental risks (impacts) attributable to accidents at the particular facility or facilities within the scope of each such statement'), and 10 CFR Section 51.23(c) (the DES 'will include a preliminary cost-benefit analysis which considers and balances the environmental and other effects of the facility...').

- (a) Do you agree with this statement by the NRC Staff? Explain your answer.
- (b) What is the basis for your answer?
28. What are your bases for your responses to interrogatories 21 through 27? Identify any documents, testimony or oral statements, and any legal requirements or guidelines on which you rely.

C. Specific Interrogatories Relating To
CESG/Palmetto Alliance DES Contention 19³

1. What is the basis for your assertion that the DES/FES fails "to evaluate the environmental costs of operation of Catawba as a storage facility for spent fuel from other Duke facilities"? Explain your answer.
2. (a) Do you contend that the DES and the FES fail to evaluate the possible environmental effects associated with the storage of Catawba spent fuel at Catawba? Explain your answer.

(b) Do you contend that the DES and FES fail to evaluate any incremental environmental effects which may result from the storage of spent fuel from Oconee and McGuire at Catawba? Explain your answer.
3. What do you mean by "failure to evaluate" as that phrase is used in this contention?
4. Do you contend that the DES and the FES entirely fail to "evaluate the environmental costs of operation of Catawba as a storage facility for spent fuel from other Duke facilities"? Explain your answer.
5. If your response to the preceding interrogatory is negative, do you contend that the DES and the FES have not given sufficient emphasis, or have otherwise not properly considered, the possible environmental costs

³ DES Contention 19 was admitted by the Board in its Memorandum and Order of February 25, 1983. As revised and limited by the Board, this contention now reads as follows:

Failure to evaluate the environmental costs of operation of Catawba as a storage facility for spent fuel from other Duke facilities compromises the validity of the favorable cost-benefit balance struck at the construction permit phase of this proceeding. Since the CP stage hearing, Duke Power has considerably expanded the Catawba spent fuel pool capacity and provided for denser storage of irradiated fuel. FSAR Table 1.2.2-1. Applicants intend to use Catawba for storage of irradiated fuel from the McGuire and Oconee nuclear facilities of Duke Power Company. FSAR 9.1.2.4; OL Application, pp. 11-12.

associated with the storage of spent fuel from other Duke nuclear facilities at Catawba? Explain your answer.

6. If your answer to the preceding interrogatory was affirmative please explain why you believe that the possible environmental costs associated with the storage of spent fuel from other Duke facilities at Catawba have not been properly evaluated (i.e., why the DES and the FES's present treatment of this issue is inadequate or improper).
7. What do you mean by the phrase "environmental costs of operation of Catawba as a storage facility"? Explain your answer.
8. Specify those environmental costs associated with the storage of Oconee and McGuire spent fuel at Catawba which you contend should be considered in the DES/FES.
9. Indicate which of the environmental costs discussed in the preceding interrogatory have not been considered in the DES/FES (or have not been considered properly).
10. Explain why those environmental costs discussed in the preceding interrogatory (i.e., those costs not considered in the DES/FES which you contend should have been considered) are significant.
11. Explain what you believe are the consequences of not considering those environmental costs which you contend have not been taken into account (or have not been considered adequately).
12. Do you intend that the "environmental costs" of storing spent fuel at Catawba be read to include severe accidents? Explain your answer.
13. Do you contend that a severe accident in the Catawba spent fuel pool is credible? If so, specify in detail the severe accidents(s) you consider credible.
14. What is your definition of "credible"?
15. Have you performed any analyses which demonstrate the credibility of the severe accident(s) referenced in response to Interrogatory 13? If so, provide such analyses or other supporting documentation.
16. Do you contend that the NRC Staff is required by any regulation, regulatory guide, policy statement, or other authority to consider "the environmental costs

of operation of Catawba as a storage facility for spent fuel from other Duke facilities"? If so, identify all such requirements.

17. What do you mean by the phrase "compromises the validity" of the CP-cost-benefit analysis?
18. Do you contend that a proper evaluation of the possible environmental costs associated with the storage of spent fuel from other Duke facilities at Catawba would reveal risks to public health and safety so substantial that the DES/FES's overall cost-benefit conclusion would be altered? Explain your answer.
19. The FES states at p. 5-19 that:

[t]he environmental analysis in Section 5.9 and Appendix D takes into account impacts from exposures to routine releases resulting from spent fuel from Catawba and the spent fuel at Oconee and McGuire that may be stored at Catawba.

In addition, section 5.9.2.12 of the FES discusses at p. 5-19 the effects of handling spent fuel from Oconee and McGuire within the fuel-handling facility at Catawba. Do you contend that the FES has failed to consider adequately the environmental costs of storing Oconee and McGuire spent fuel at Catawba? Explain your answer.

20. What are the bases for your responses to interrogatories 1 through 19? Identify all documents, calculations, testimony or oral statements, and all legal requirements or guidelines on which you rely.

D. Specific Interrogatories Relating To
CESG/Palmetto Alliance DES Contention 17⁴

1. What is your basis for the statement that the DES/FES averages meteorological conditions in its consideration of accidents?
2. Please explain fully why you feel that such averaging is improper or incorrect. What is the basis for your statement?
3. Please identify, making reference to particular calculations and/or data, the factors which were considered in the DES/FES and which, in your opinion, render the DES/FES inadequate.
4. What do you mean by "atmospheric inversions" as that term is used in the first paragraph of this contention? Specify the precise meteorological characteristics associated with this phenomenon.
5. What do you mean by "quiet air" as that term is used in the first paragraph of this contention? Specify the precise meteorological characteristics associated with this phenomenon.
6. Is the term "atmospheric inversion" synonymous with "the extreme condition of inversion"? Is "quiet air" synonymous with "very slow air movement"? If not, explain how these various atmospheric conditions differ.

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- 4 17. The DES is concerned with environmental impacts. Presumably these are best represented as the entire range from trivial to serious, in conjunction with the estimates of likelihood. The DES averages meteorological conditions in its consideration of accidents, 5.9.4.5. Because atmospheric inversions and quiet air are a very common feature in this region, accident consequences should be calculated for the extreme condition of inversion and very slow air movement.

In the matter of assessing serious accidents, the environmental assumptions are complex and again do not appear to consider extreme weather, p. 5-37. The DES, which differs from the CP FES in considering severe accidents, is at fault in not considering the full range of radiological impacts by not considering extreme, but frequently encountered, weather conditions.

7. Are the terms "extreme weather" and "extreme, but frequently encountered, weather conditions" as used in the second paragraph of this contention meant to refer to meteorological conditions different from those mentioned in Interrogatories 4 and 5? If so, explain how the various types of atmospheric conditions differ.
8. Do the terms discussed in interrogatories 4-7, above, correlate to established descriptions or types of atmospheric conditions, i.e., "Pasquill type 6"? If so, indicate such classification and explain why these atmospheric conditions fit the classification.
9. Is the term "a very common feature" meant to be synonymous with the term "frequently encountered"? If not, please distinguish the frequency of occurrence represented by each of these 2 terms. Please provide all supporting meteorological data (or other information) upon which you rely.
10. What is your basis for stating that atmospheric inversions and quiet air "are a very common feature"?
11. Explain fully the applicable geographical boundaries associated with the term "in this region."
12. What are your bases for your responses to Interrogatories 1 through 11? Identify any documents, calculations, testimony or oral statements and any legal requirements or guidelines on which you rely in your responses.
13. The estimated radiological consequences of design-basis accidents set forth in Table 5.9 of the DES/FES are based upon "meteorological dispersion conditions that are an average value determined by actual site measurements." (FES, p. 5-35). Do you contend that the "environmental assumptions" used to calculate these radiation doses entirely fail to take into account the possible effects of "inversion and very slow air movement"? If so, please explain.
14. If your response to the preceding interrogatory is negative, do you contend that the "environmental assumptions" used in the DES/FES fail to place sufficient emphasis upon the possible effects of "inversion and very slow air movement"? If not, please explain.

15. If your answer to the preceding interrogatory is affirmative, explain why you believe that the effects of "inversion and very slow air movement" upon design-basis accident radiation doses have not been properly considered, and why the DES/FES's present treatment of these meteorological factors is inadequate.
16. What additional consideration do you contend should be given to "inversion and very slow air movement" in calculating design-basis accident radiation doses? Explain the basis for your answer.
17. Do you contend that the NRC Staff is required by any regulation, regulatory guide, policy statement, or other authority to consider "the extreme condition of inversion and very slow air movement" in calculating the radioactive doses associated with design-basis accidents? If so, identify all such requirements.
18. In addition to the "realistic" doses shown in Table 5.9, the NRC Staff is also conducting a safety evaluation of design-basis accidents to estimate the potential upper limits of individual exposure in the event of the initiating events listed in Table 5.9. These calculations assume "very poor meteorological dispersion conditions" (DES/FES, p. 5-35), and result in estimated doses at the Exclusion Area Boundary which "would not be exceeded more than 5% of the time because of other meteorological conditions at the site." (FES, p. 9-12). Do you contend that the "environmental assumptions" used to calculate these radiation doses entirely fail to take into account the possible effects of "inversion and very slow air movement"? If so, please explain.
19. If your response to the preceding interrogatory is negative, do you contend that this analysis in the DES/FES fails to place sufficient emphasis upon the possible effects of "inversion and very slow air movement"? If not, please explain.
20. If your answer to the preceding interrogatory is affirmative, explain why you believe that the effects of "inversion and very slow air movement" upon these projected radiation doses have not been properly considered, and why the DES's present treatment of these meteorological factors is inadequate.
21. In calculating the potential radiological consequences associated with severe accidents, the DES/FES takes into account site-specific environmental parameters

which include "meteorological data for the site representing a full year of consecutive hourly measurements and seasonal variations." (DES/FES, p. 5-37). Do you contend that the methodology used to calculate these doses entirely fails to take into account the possible effects of "extreme, but frequently encountered, weather conditions"? If so, please explain.

22. If your answer to the preceding interrogatory is negative, do you contend that this analysis in the DES/FES fails to place sufficient emphasis upon the possible effects of "extreme, but frequently encountered, weather conditions"? If not, please explain.
23. If your answer to the preceding interrogatory is affirmative, explain the reason for your belief that the effects of "extreme, but frequently encountered, weather conditions" upon severe accident radiation doses have not been properly considered, and why the DES/FES's treatment of these meteorological factors is inadequate.
24. What additional consideration do you contend should be given to "extreme, but frequently encountered, weather conditions" in calculating severe accident radiation doses? Explain the reason for your answer.
25. Do you contend that the NRC Staff is required by any regulation, regulatory guide, policy statement or other authority to consider "extreme, but frequently encountered, weather conditions" in calculating the radiation doses associated with serious accidents? If so, identify all such requirements.
26. What are the bases for your responses to interrogatories 13 through 25? Identify all documents, calculations, testimony, or oral statements, and all legal requirements or guidelines, on which you rely in support of your responses.
27. Do you contend that the meteorological considerations of the DES/FES should reflect only the "extreme condition of inversion and very slow air movement" in calculating the potential radiological doses associated with design-basis and severe accidents? Explain the reasons for your answer.
28. Do you contend that the DES/FES's projected radiation doses associated with design-basis and serious accidents are currently incorrect because the possible effects of inversion and very slow air movement have

not been adequately considered? If so, what meteorological assumptions do you contend should be made in the calculation of design-basis and severe accidents?

29. Do you contend that additional consideration of the possible effects of "inversion and very slow air movement" upon radiological doses from design-basis and severe accidents at Catawba Nuclear Station would alter the DES/FES's conclusion that "the risk of incurring any adverse health effects as a consequence of [design-basis or severe accidents] is exceedingly small"? (FES, p. 5-35). Explain the basis for your answer, making reference to any calculations or documents you have to support your answer.
30. Do you contend that additional consideration of the effects of these meteorological factors upon radiological consequences would reveal risks to public health and safety so substantial that the DES/FES's overall cost-benefit conclusion would be affected? Explain your answer.
31. Do you dispute the validity of the following statement, which appears at p. 4-12 of the FES:

The meteorological data sets used for dose consequence assessments for accidental or routine releases contained in the FES adequately reflect expected occurrences of stable atmospheric conditions accompanied by low wind speed in the vicinity of the Catawba site." Explain your answer.

32. What are the bases for your responses to interrogatories 27 through 31? Identify all documents, calculations, testimony or oral statements, and all legal requirements or guidelines, on which you rely in support of your responses.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Interrogatories And Requests To Produce To Carolina Environmental Study Group And Palmetto Alliance Regarding Palmetto Alliance's And Carolina Environmental Study Group's DES Contentions 11, 17 And 19" in the above captioned matter have been served upon the following by deposit in the United States mail this 18th day of April, 1983.

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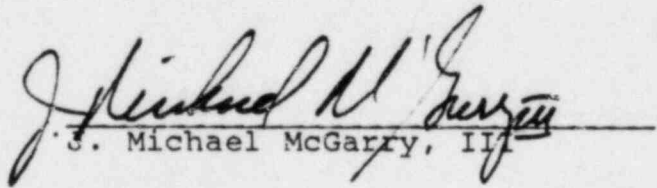
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