

April 21, 1983

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE
ATOMIC SAFETY AND LICENSING BOARD

RELATED CORRESPONDENCE

In the Matter of)
)
UNITED STATES DEPARTMENT OF ENERGY)
)
PROJECT MANAGEMENT CORPORATION) Docket No. 50-537
)
TENNESSEE VALLEY AUTHORITY)
)
(Clinch River Breeder Reactor Plant))
)

APPLICANTS' TENTH SET OF INTERROGATORIES
AND REQUEST FOR ADMISSIONS
TO NATURAL RESOURCES DEFENSE COUNCIL
AND THE SIERRA CLUB

Pursuant to 10 C.F.R. § 2.740b, the United States Department of Energy and Project Management Corporation, for themselves and on behalf of the Tennessee Valley Authority (the Applicants), submit the following interrogatories to Intervenors, Natural Resources Defense Council and the Sierra Club. These interrogatories must be answered fully, within 14 days in writing and under oath, by one or more representatives of NRDC or the Sierra Club who have personal knowledge of the matters herein.

In addition to providing the direct answer to each interrogatory, where applicable, please provide the following:

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

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

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

(d) Identify the expert(s), if any, which Intervenors intend 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 Intervenors 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 Applicants.

INTERROGATORIES

1. Describe in detail the basis for Intervenors' belief that a protective action guide for bone exposure is necessary for CRBRP.

a. Identify all documents which support Intervenors' response to this interrogatory.

2. Describe in detail the basis for Intervenors' belief that there is a "potentially high dosage associated with groundshine from fallout" of strong gamma emitters during cloud passage. See Intervenors' response to interrogatory 21, Applicants' Eighth Set of Interrogatories.

a. Quantify the phrase "high dosage" as used in Intervenors' response to interrogatory 21.

b. List all strong gamma emitters which Intervenors believe will cause high groundshine doses from fallout during cloud passage.

c. Identify and describe in detail all analyses, studies, experimental data, or any other data, which support Intervenors' belief that fallout of strong gamma emitters during cloud passage will result in high groundshine doses.

d. Identify all documents which support Intervenors' response to this interrogatory.

3. Describe in detail the methodology which Intervenors believe should be used in establishing the plume exposure EPZ.

a. Identify all documents which support Intervenors' methodology.

4. Identify the distance to the boundary of the plume exposure pathway EPZ which Intervenors believe should be established for CRBRP.

a. Describe in detail the basis for Intervenors' plume exposure pathway EPZ.

b. Identify all analyses or studies performed by Intervenors which support their plume exposure pathway EPZ.

c. Identify all documents which support Intervenors' response to this interrogatory.

5. Describe in detail the basis for Intervenors' belief that ground contamination levels should be taken into account in establishing the boundary of the plume exposure pathway EPZ.

a. Describe the methodology which Intervenors believe should be used in determining ground contamination levels.

b. Describe any analyses or studies which Intervenors have performed of the ground contamination levels following an accident at CRBRP.

c. Identify all documents which support Intervenors' response to this interrogatory.

6. Describe in detail the basis for Intervenors' belief that there is a "potential for high doses following a CDA prior to completion of evacuation." Intervenors' response to interrogatory 27, Applicants' Eighth Set of Interrogatories.

a. Quantify the phrase "high doses" as used in Intervenors' response to interrogatory 27.

b. Identify and describe in detail all analyses, studies or experimental data which support Intervenor's belief that there is "a potential for high doses following a CDA prior to completion of evacuation."

c. Identify all documents which support Intervenor's response to this interrogatory.

7. Describe in detail what Intervenor's believe to be the purpose of the plume exposure pathway EPZ.

a. Identify all documents which support Intervenor's response to this interrogatory.

8. Describe in detail the basis for the statement in Intervenor's response to Applicants' interrogatory 31, Applicants' Eighth Set of Interrogatories to Intervenor's, that "the time period available for evacuation is too short under some scenarios." The answer to this interrogatory must include a detailed description of all scenarios in which the evacuation time period is "too short."

a. For each scenario identified above, quantify the phrase "too short" with respect to that scenario.

b. Identify all documents which support Intervenor's response to this interrogatory.

9. Describe in detail all analyses or studies performed by Intervenor's which demonstrate that there is a "potentially short evacuation time in the event of an accident at CRBRP."

a. Identify all documents which support Intervenor's response to this interrogatory.

10. Identify and describe in detail all studies or analyses performed by Intervenors which demonstrate that there would be a significant release of plutonium in the event of a CDA at CRBRP.

11. Describe in detail the basis for Intervenors' belief that off-site decontamination facilities would be necessary in the event of an accident at CRBRP.

a. Describe in detail the precise accident sequences which Intervenors believe would require off-site decontamination facilities.

b. Identify all documents which support Intervenors' response to this interrogatory.

12. Describe in detail the basis for Intervenors' contention that reentry and rehabilitation PAG's should be established for purposes of emergency planning.

a. Identify any regulatory requirements of which Intervenors are aware which require an emergency plan to encompass reentry and rehabilitation.

b. Identify all documents which support Intervenors' response to this interrogatory.

ADMISSIONS

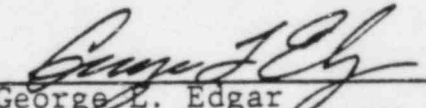
1. Intervenors have performed no analyses or studies establishing that there is a potential for high doses following a CDA prior to completion of evacuation.


2. The major impediments as set forth in Intervenor's contention 9(c) are "the potential for high doses following a CDA prior to completion of evacuation."

3. Intervenor's have done no analysis of evacuation times for an EPZ greater than ten miles.

4. The basis for Intervenor's contention 9(c) that the PSAR contains insufficient analysis of the time requirement to evacuate various sectors and distances within the plume exposure pathway EPZ for transient and permanent population, is that the PSAR analysis of evacuation times is limited to a ten mile EPZ.

Respectfully submitted,


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Management Corporation


William D. Luck
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Department of Energy