

April 29, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

MAY -2 11:52

In the Matter of

VIRGINIA ELECTRIC AND
POWER COMPANY

(North Anna Power Station,
Units 1 and 2)

)
) Docket Nos. 50-338/339-OLA-2
)
)
)

APPLICANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
AND FIRST INTERROGATORIES TO LOUISA COUNTY

Virginia Electric and Power Company (the Applicant) hereby requests Louisa County to produce at a mutually agreed-upon location each of the documents set forth below, in accordance with 10 C.F.R. § 2.741. In addition, the Applicant propounds the interrogatories set forth below to which Louisa County is asked to respond in accordance with 10 C.F.R. § 2.740(b). These discovery requests pertain to the two contentions admitted by the Atomic Safety and Licensing Board in the North Anna license amendment proceedings.

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DEFINITIONS

A. "County" means the government organization of Louisa County and any officer, official, employee, representative, consultant, agent, contractor, subcontractor, technical advisor, attorney, or other person acting for or on behalf of the County or at the County's direction, or in concert with the County or assisting the County.

B. "Document" means any handwritten, typewritten, printed or recorded graphic matter however produced or reproduced, whether or not in the possession, custody or control of the County and whether or not claimed to be privileged against discovery on any ground, including but not limited to, reports, records, lists, memoranda, correspondence, telegrams, schedules, photographs, sound recordings, ledgers, books of account, catalogues, checks, check stubs, brochures and written statements of any person.

If the County considers any document called for in this request to be privileged from production, the County must include in its response to this request a list of documents withheld from production, identifying each document by date, addressee(s), author, title and subject matter. In addition, the County should identify those persons who have seen the document or who were sent copies, and state the ground(s) upon which each such document is considered privileged.

If any document called for in this request has been destroyed, the County must include in its response to this request a description of the documents destroyed, identifying each document by date, addressee(s), author, title and subject matter. In addition, the County should state the date of destruction, the identity of the person or persons who destroyed the document, and the reason the document was destroyed.

C. The words "pertaining to" include referring to, responding to, relating to, connected with, concerning, comprising, memorializing, commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting and constituting.

DOCUMENT REQUEST

1. All documents in the County's possession pertaining to boraflex being subject to corrosive attack in a spent fuel pool.

2. All documents in the County's possession pertaining to the replacement of spent fuel racks resulting in overexposure to workers.

INTERROGATORIES

1. Identify each person the County expects to call as an expert witness, and for each expert witness state:
(i) his or her professional qualifications; (ii) the subject matter on which the expert is expected to testify;
(iii) the substance of the fact and opinions as to which

each expert is expected to testify; and (iv) a summary of the ground of each opinion for each expert.

2. Indicate in what way and for what reasons the County expects boraflex to corrode in the spent fuel pool.

3. Indicate in what way and for what reasons the County expects exposure to workers to be excessive.

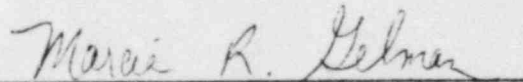
4. Indicate why Vepco's "ALARA" program, which applies to all construction work at its nuclear power stations, is not sufficient to demonstrate that exposures will be "as low as reasonably achievable."

5. Indicate how Vepco has failed to satisfy the requirements of 10 C.F.R. §§ 50.36, 50 (Appendix A), general design criteria 14, 61 and 62 and § 50 (Appendix B).

6. Indicate the regulatory basis, and any other basis, for requiring Vepco to perform periodic inspections or to maintain a surveillance sample program for boraflex material.

Respectfully submitted,

VIRGINIA ELECTRIC AND
POWER COMPANY



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(804) 788-8672

Dated: April 29, 1983

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing First Request For Production of Documents and First Interrogatories to Louisa County upon each of the persons named below by depositing a copy in the United States mail, properly stamped and addressed to him at the address set out with his name:

Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555
Attention: Chief, Docketing and Service Section

Sheldon J. Wolfe, Chairman
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Atomic Safety and Licensing Appeal Board
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Washington, D.C. 20555

Marcia R. Gelman
/s/ Marcia R. Gelman

Marcia R. Gelman, Counsel
for Virginia Electric and
Power Company

Dated: April 29, 1983