

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
DUKE POWER COMPANY, et al.)
(Catawba Nuclear Station,)
Units 1 and 2))

Docket Nos. 50-413

50-414
Office of the
Docketing & Sec.
Branch

APPLICANTS' FOLLOWUP INTERROGATORIES TO PALMETTO
ALLIANCE ON CONTENTIONS 6, 7, 8, 16, AND 27

Pursuant to 10 C.F.R. §2.740b, Duke Power Company, et al. ("Applicants") submit the following followup interrogatories on Contentions 6, 7, 8, 16, and 27 to intervenor Palmetto Alliance. In accordance with the Licensing Board's Order of April 1, 1983 (p. 2) these interrogatories are being filed within 10 working days of Applicants' receipt of "Palmetto Alliance Supplementary Responses to Applicants' and Staff's Interrogatories Regarding Contentions 6, 7, 8, 16, 27 and 44" filed April 19, 1983. The April 1 Order requires that Palmetto Alliance's answers to these followup interrogatories are to be filed by May 20, 1983.

CONTENTION 6

1. List and describe in detail all instances of alleged "substandard workmanship" upon which Contention 6 is based or upon which you rely for support of Contention 6. For each instance of alleged substandard workmanship, please provide the date and time the alleged substandard workmanship occurred (for example, November 1978 at 4:00 p.m.) or the date when it was first brought to your attention; describe the precise location within the plant where the alleged substandard workmanship occurred. (The detail of this description should be sufficient to allow an individual to locate the alleged substandard workmanship (for example, the hot log piping entering reactor coolant pump #1-A).); and state the name of the individual (and his position) who performed the alleged substandard workmanship (for example, John Doe, welder from the Construction Department).

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2. For each instance of substandard workmanship identified in response to Interrogatory 1, describe the precise work which you consider substandard and why you believe that it is substandard. (The detail of this description should be sufficient to allow an individual to determine if any deficiency remains, (for example, the welding on the hot leg piping entering reactor coolant pump #1-A was defective in that the root pass contained voids).); state whether, to the best of your knowledge, the alleged substandard workmanship was corrected and state whether this alleged instance of substandard workmanship will have an adverse impact on plant operation, and, if so, what the impact will be (for example, if the defective weld ruptures, it could cause a LOCA).
3. For each instance of alleged substandard workmanship identified in response to Interrogatory 1, identify the precise regulatory requirement (including the appropriate subsection of the Commission's regulations) which you believe is breached by the alleged substandard workmanship (for example, the failure to provide adequate welding of the hot leg piping could result in a breach of the reactor coolant pressure boundry, in violation of criterion 14 of 10 C.F.R. Part 50).
4. Identify the precise industry standard (including the appropriate subsection) which you contend that the alleged substandard workmanship has breached (for example, the ASME Code at subsection NB4424 gives the surface requirements prior to commencing welding.)
5. Describe how each instance of alleged substandard workmanship was brought to your attention (for example, Joe Doe (the person who performed the substandard workmanship) told Molly Smith (a member of your organization)). If the alleged instance of substandard workmanship was brought to your attention through a written source, identify the source and the appropriate page and section number.
6. If Palmetto Alliance contends that any or all of the examples of the above-described alleged substandard workmanship results in "systematic deficiencies in plant construction" list each such systematic deficiency and, with respect to each instance of substandard workmanship, explain in detail why you believe that it, either alone or in combination with other examples, constitutes such systematic deficiency.
7. List and describe in detail all instances of alleged "poor quality control" upon which Contention 6 is based or upon which you rely for support of Contention 6. For each instance of poor quality control, state the date and time the alleged poor quality control occurred (for example, November 1978 at 5:30 p.m.) or the date when it was first brought to your attention; identify the precise location within the plant where the alleged poor quality control occurred. (The detail of this description should be sufficient to allow an individual to identify the alleged area of poor quality control (for example, the hot leg piping entering reactor coolant pump #1-A).); and state the name and position of the individual who performed the alleged poor quality control (for example, Harry Smith, Welding Quality Control Inspector from Duke Power Company).
8. For each instance of poor quality control, identify the precise action which you believe reflects the alleged poor quality control; and why you

believe it reflects poor quality control (for example, the Quality Control Inspector failed to inspect the root pass weld on the hot leg piping entering reactor coolant pump #1-A as required by the welding procedure hold point); and state whether this alleged instance of poor quality control will have an adverse impact on plant operation, and, if so, what the impact will be (for example, if the defective weld ruptures, it could cause a LOCA).

9. For each instance of poor quality control, state whether, to the best of your knowledge, the alleged instance of poor quality control resulted in a specific construction deficiency in the plant. If you believe that such a deficiency resulted, identify specifically each such construction deficiencies and, with respect to each, explain what you believe to be its potential significance.
10. For each instance of poor quality control, identify the precise regulatory requirement (including the appropriate subsection of the Commission's regulation) which you believe is breached by the alleged instance of poor quality control, and why you believe that the alleged instance of poor quality control breached the regulation (for example, Section IX of Appendix B to 10 C.F.R. Part 50 states that special processes such as welding must be accomplished using qualified procedures in accordance with applicable codes, standards, specifications, criteria and other special requirements. Failure to inspect the root pass is contrary to the qualified procedure under which the weld is being performed).
11. For each instance of poor quality control, identify the precise industry standard (down to and including the appropriate subsection) which you contend that the alleged instance of poor quality control breached (for example, the ASME code at subsection NB 4424 gives the surface requirements prior to commencing welding).
12. Describe how each instance of alleged poor quality control was brought to your attention (for example, John Doe (the person who performed the welding) told Molly Smith (a member of our organization) that in this weld the Quality Control Inspector said that his supervisor told him not to look at the root pass and to allow the welder to proceed on with the welding without an examination of the root pass). If the alleged instance of poor quality control was brought to your attention through a written source, identify the source and the appropriate page and section number.
13. If Palmetto Alliance contends that there are systematic deficiencies in Applicants' Quality Assurance program, list each deficiency, with specific reference to the appropriate NRC standard, and the section and page number in Applicants' QA Topical Report, and explain why it fails to comply with the appropriate NRC standards.
14. Describe all instances or examples of pressure to approve faulty workmanship known to Palmetto Alliance, including the names of all persons involved and their respective roles, the location in the plant, and identify specifically the precise documents and sections thereof related to each such instance or example.

15. Describe each instance or example of substandard workmanship or poor quality control that Palmetto Alliance contends has not been corrected by Applicants, including in such description the names of all persons involved, the location in the plant, and identify specifically the precise documents and sections thereof which pertain to any such instance or example.
16. If Palmetto Alliance contends that changes or modifications in Applicants' Quality Assurance program are necessary for it to provide adequate confidence that the plant will perform satisfactorily in service, describe all changes or modifications Palmetto Alliance contends should be implemented.
17. List the names, addresses, telephone number, and place of employment of all persons not previously identified in response to interrogatories on whom Palmetto Alliance intends to rely in support of its position on this contention.
18. Describe the manner in which Palmetto Alliance contends Applicants should have responded to the concerns which it contends were expressed by Mr. Hoopingarner and Mr. McAfee.
19. Explain what you mean by "cover-up of problems by DPC, NRC, and OSHA" as used in Palmetto Alliance's response to Interrogatory 93, including in such explanation the name of all persons involved and the problem or concern that was the subject of the "cover-up."
20. If in support of Contention 6 you intend to rely on any document, correspondence, event, observation, or other basis (legal, physical, technical or otherwise) other than that noted in response to these Interrogatories, please provide a detailed description of each such other item and describe how you contend it supports your position on Contention 6. The description should be as detailed as that requested for the Interrogatories, to include names, places, dates, page and section numbers, etc. If for support of Contention 6 you intend to rely on only the instances described in response to those Interrogatories, so state.

CONTENTION 7

1. Do you know to which particular "weaknesses in adherence to operating and administrative procedures" and which particular "failure(s) to follow procedure" at Duke facilities the NRC Staff was referring in NUREG-0834? If so, identify and explain the significance of all instances of "weakness" in adhering to procedures and all instances of "failure to follow procedures" of which you are aware, indicating the date, time, location within the plant, the individuals involved, the nature of the incident and its effect on the safe operation of Catawba. Provide the source(s) of your information, with specific reference to page and section number, if appropriate.
2. If you identified any specific examples of "weaknesses in adherence to operating and administrative procedures" and "failures to follow procedures" in response to the previous interrogatory, indicate for each such incident whether you believe, to the best of your knowledge, that such "weaknesses" and "failures" have or have not been corrected.
3. If you identified any "weaknesses" and "failures" in answer to the previous interrogatory that you believe have been corrected, explain fully why these incidents are "predictive of probable future failure at the Catawba facility." What are the bases for your answer?
4. You have conceded in response to Applicants' April 9, 1982 interrogatories that the allegations raised in the March 29, 1977 letter from Ernest Volgennau to Carl Horn, Jr. concerning Oconee did not apply to Catawba, and that you do not contend that these allegations have been left uncorrected with regard to Catawba. Given these statements, explain fully how these allegations are "predictive" of Applicants' inability to operate the Catawba plant safely and the basis for your position on this matter.
5. Explain fully why you contend, and the basis for your belief, that the SALP Board "mistakenly" credits Duke Power Company with "responsiveness to safety issues" in the company's internal task force review of QC Welding Inspector complaints.
6. In your Supplemental Response to Applicants' Interrogatory 25 on Contention 7 (see April 19, 1983 Supplemental Responses at p. 29), you indicated that Applicants' "track record" constituted noncompliance with 10 CFR §50.57(a)(3), and that

[t]he additional NRC regulations not complied with [and] the activities representing such noncompliance are identified, in part, by the NRC Staff in the reports and documents set forth above in response to Interrogatory 11.

Identify specifically any NRC regulations other than §50.57 which you contend Applicants have violated or are presently violating, including, but not limited to, any "additional NRC regulations not complied with" by Applicants which you contend are mentioned by the NRC Staff in the 1981 SALP Report (NUREG-0834), the 1982 SALP Report and the March 29,

1977 letter from Ernest Volgennau to Carl Horn, Jr. with respect to each such NRC regulation identified, explain specifically why you believe that Applicants have violated, or are violating, those regulations. Provide the bases for your response.

7. Explain specifically the manner in which Applicants have allegedly failed to comply with 50.57(a)(3) and with any other regulatory provisions you contend have been violated because of "Duke's consistent failure to adhere to required Commission operating and administrative procedures."
8. Are you aware of Duke Power Company's actions to correct the "history of repetitive and chronic noncompliance" mentioned in the March 29, 1977 letter from Ernest Volgennau to Carl Horn, Jr.? If so, are such efforts sufficient to alleviate your concern that the Catawba facility will not be operated safely? Explain your answer and provide the basis for your answer.
9. If you contend that this "history of repetitive and chronic noncompliance" has been corrected, explain fully how such history is predictive of Applicants' ability to operate Catawba safely.
10. If you contend that this "history of repetitive and chronic noncompliance" has not been corrected, explain, with specific reference to each of Duke Power Company's actions to correct such "history" why you believe those actions have not been effective.
11. In view of what you contend is Applicants' "track record," (e.g., the "history of repetitive and chronic noncompliance") what remedial measures do you contend are necessary to provide adequate assurance that the Catawba facility can be operated in a manner which will not "endanger the public health and safety." What are the bases for your answer?
12. Explain why you contend that the Welding Inspectors' allegations mentioned in your Supplemental Response to Interrogatory 11 "demonstrate[] ongoing serious failures by Duke Power Company" which impugn the assurance that Catawba can be operated safely. Provide the basis for your answer.

CONTENTION 8

1. In your April 19, 1983 Supplemental Response to Interrogatory 2, you indicated that the actual performance of the control manipulations and plant evolutions listed in Section 5.5.1.2.1 of the American National Standard for Selection, Qualification and Training of Personnel for Nuclear Power Plants (ANSI/ANS-3.1-1981) (1981) represents "hands-on operating experience." Do you contend that the performance of these activities constitutes "sufficient hands-on operating experience" for reactor operators and/or shift supervisors as that term is used in your contention? Why or why not? Explain the bases for your answer whether it is affirmative or negative.
2. If your answer to the preceding interrogatory is negative, do you contend that another section of ANSI/ANS-3.1/1981, or any other document, sets forth criteria which you believe constitute "sufficient hands-on operating experience?" State the bases for your answer.
3. Do you maintain that ANSI/ANS-3.1-1981 should be relied upon with regard to your contention?
4. Explain fully your reasons for asserting that "hands-on operating experience" is required to satisfy 10 C.F.R. §50.57(a)(3), and that this regulatory provision has not been satisfied by Applicants' reactor operators and shift supervisors. What are the bases for your response?
5. Do you contend that Applicants' reactor operators and shift supervisors have failed to comply with NRC regulations other than 50.57(a)(3), or any other standards or guidelines for assessing the adequacy of reactor operators' "hands-on" experience? State the basis for your answer. If you do so contend, identify specifically each such regulation, standard, or guideline and, with regard to each, explain specifically why you contend that each of Applicants' reactor operators and/or shift supervisors do not comply.
6. Assuming, as your Supplemental Response to Interrogatory 8 indicates, that Palmetto Alliance is not prepared to suggest a standard for what constitutes "sufficient hands-on operating experience," explain why you believe that the experience level of each of Applicants' reactor operators and/or shift supervisors is "clearly inadequate." Provide all sources on which you intend to rely in support of your position. Where appropriate, identify the specific section and page number for each such source.
7. Explain fully why you imply in your Supplemental Response to Interrogatory 26 that Applicants' shift supervisors are not licensed as senior operators. Provide the bases for your answer.
8. In your April 19, 1983 Supplemental Response to Interrogatory 47, you state that "Palmetto intends the term 'primary management responsibility' to mean the same as employed in NUREG-0737" Specify the exact section of NUREG-0737 which defines this term, and explain fully why you contend that Applicants have failed to provide "primary management

responsibility," indicating in particular how you contend that each applicable item in NUREG-0737 has been violated.

9. In your Supplemental Responses to Interrogatories 55, 56 and 58 you indicate that since "safe operation of the plant" is not defined in NRC regulations, you do not contend that Applicants are in violation of any NRC requirements in this area. Moreover, in your response to Interrogatory 57 you decline to suggest a standard for "safe operation of the plant" other than "functioning of the facility in a manner so as not to endanger." In light of these previous responses, explain how you propose to demonstrate that Applicants' reactor operators and shift supervisors cannot operate Catawba safely, making reference to all documents, analyses, studies, etc. relied upon.
10. Explain fully how you propose that the ability of Applicants' reactor operators and shift supervisors to operate Catawba safely should be gauged, making reference to all standards which you believe should be met.
11. Since as your Supplemental Interrogatory responses indicate (see, e.g. response to Interrogatory 8), you are "not prepared to establish at this time a level of 'sufficient' hands-on operating experience needed to assure safe operation of the facility," explain how you intend to demonstrate that the experience level of Applicants' reactor operators and shift supervisors is "clearly inadequate," including in your responses all of the documents, analyses, studies, etc. upon which you rely in support of your answer. With respect to each such source, specify the precise section or page number on which you rely.
12. Do you intend to propose and/or establish during the upcoming hearing a proposed level of "sufficient hands-on operating experience" for reactor operators and shift supervisors? If your answer is affirmative and you are now prepared to do so, specify your proposed level. If you are not now prepared to do so, state when you will be prepared so to specify.
13. Explain what you contend are the differences between "experience" and "sufficient hands-on operating experience."
14. Explain fully why you believe that the "hands-on operating experience" of the individuals listed in your Supplemental Response to Interrogatory 68 is insufficient, making specific reference to particular aspects of each person's resume. Provide the bases for your answer.
15. Explain fully what you mean by the term "nuclear experience" as that term is used in your April 19, 1983 Supplemental Response to Interrogatory 81. What are the bases for your answer?
16. Explain fully why you contend in your April 19, 1983 Supplemental Response to Interrogatory 81 that "Applicants plan to license operators with 'no nuclear experience' ...," making reference to the particular section of the FSAR, and the specific reactor operators, which you contend supports this assertion.

17. Do you contend that Sections 13.2.3 and 13.2.4 of the Catawba FSAR set forth the levels of experience which Applicants' reactor operators at Catawba will have at the completion of their training program? Explain your answer.

CONTENTION 16

1. What are the specific concerns (if any) you have about the storage of Oconee and McGuire spent fuel in the expanded spent fuel pools at Catawba? Explain why these concerns are different from concerns associated with the storage of only Catawba spent fuel in the Catawba spent fuel pools. State the bases for your answer, indicating any analyses, calculations, regulations or guidelines, studies, testimony, or other documents upon which you rely in support of your answer.
2. With respect to your Supplemental Response to Interrogatory 5, do you contend that Applicants have not satisfied §50.57(a)(3) and/or that Applicants cannot satisfactorily carry their burden of complying with §50.57(a)(3)? Explain the bases for your answer.
3. Explain fully how you contend that Applicants could demonstrate that "reasonable assurance exists that such spent fuel storage activities will be conducted without endangering the health and safety of the public," and whether or not you contend that Applicants cannot carry this burden under any circumstances. Provide the sources for your answer, making reference to all calculations, regulations, guidelines, analyses, oral and written testimony, and any other documents, with reference to specific sections and page numbers thereof, upon which you rely in support of your answer.
4. Explain fully why you contend in your Supplemental Response to Interrogatory 6 that "the design of the enlarged fuel pools has not adequately accommodated the expanded Catawba heat load" caused by the increased number of assemblies to be stored, including in your discussion specific reference to any calculations, analyses, regulations, guidelines oral or written testimony, and any other documents, with reference to specific sections and page numbers thereof, which form the bases for your answer.
5. Do you contend that the water temperature in the spent fuel pool cannot be maintained below 150°F for worst case loading if both spent fuel pool system trains are operating? If one train is operating? Explain the bases for your answer, providing references to any calculations, regulations, guidelines, analyses, oral or written testimony, or other documents, with reference to specific sections and page numbers thereof, on which you rely.
6. Explain whether you contend that the fuel liner plate cannot adequately withstand temperatures in excess of 150°F; and, if so, what the bases are for your belief, making reference to all calculations, guidelines, analyses, oral and written testimony, and other documents, with reference to specific sections and page numbers thereof, upon which you rely in support of your answer.
7. Define "fuel pool water boil-off" as that term is used in your Supplemental Response to Interrogatory 6, and explain whether you contend the potential for such boil-off resulting from worst case loading of Oconee, McGuire and Catawba spent fuel is greater than the potential

for fuel pool water "boil-off" resulting from worst case loading of Catawba fuel alone. Provide the bases for your answer, making reference to all calculations, studies, guidelines, oral and written testimony, and other documents, with reference to specific sections and page numbers thereof, upon which you rely in support of your answer.

8. Explain fully what you mean by "loss of on-sight/off-sight [sic] power" as that phrase is used in your Supplemental Response to Interrogatory 6.
9. Explain why you contend that a spent fuel cask can drop into the Catawba spent fuel pool; and provide the bases for your assertion, making reference to all regulations, guidelines, calculations, analyses, oral and written testimony, and any other documents, with reference to specific sections and page numbers thereof, on which you rely.
10. Explain fully and specifically the reasons and the basis for your statement (in your Supplemental Response to Interrogatory 22), that:

Palmetto Alliance contends that Applicants cannot safely store irradiated fuel assemblies transshipped from its other facilities in its proposed cascade plan.

Provide the basis for your response, making reference to all regulations, guidelines, calculations, analyses, oral and written testimony, and other documents, with reference to specific sections and page numbers thereof, upon which you rely.

11. Please explain fully what you mean by the "improvements" in the Catawba spent fuel pool in your Supplemental Response to Interrogatory 46, and provide the basis for your answer.
12. Do you contend that Applicants have failed to comply with the "internal design criteria "applicable to spent fuel pool design, construction and operation, including GDC 2, 4, 44, and 60-64? If so, explain how each such criteria has not been met, and provide the bases for your answer.

CONTENTION 27

1. Explain fully the manner in which you contend Applicants have failed to comply with 10 C.F.R. §50.47(b)(4), which requires nuclear power reactors' onsite and offsite emergency plans to have

A standard emergency classification and action level scheme, the basis of which include facility system and effluent parameters [which] is in use by the nuclear facility licensee and State and local response plans call on reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Provide the bases for your answer, including all documents, oral and written testimony or other material on which you rely, with reference to specific sections and page numbers thereof.

2. Explain fully why you contend that §50.57(a)(3) and §50.47(b)(4) "should be read to mandate" the use of real time monitors and provide the bases for your answer.
3. In your Supplemental Response to Interrogatory 19, you agree that the offsite radiation monitoring system which Applicants propose to use will provide the information which you contend will be provided by "real time monitors," but indicate your belief that Applicants' system "will be less effective than that proposed by Palmetto." Explain specifically the exact system which you contend should be used and why you contend that Applicants' system will be less effective, making reference to all documents, testimony and oral statements upon which you rely in support of your answer, with reference to specific sections and page numbers thereof.
4. Explain whether you contend that any or all of the information which you contend will be provided by "real time monitors" is required by NRC regulations; and, if so, which such information is required. Provide the basis for your answer, making reference to all documents, testimony and oral statements on which you rely, with reference to specific sections and page numbers thereof.
5. In your Supplemental Response to Interrogatory 27, you indicate that "Palmetto does not have [in] mind an accuracy level in its use of the term capability," as that term applies to Intervenor's assertion that real time monitors "capable" of reading "gamma radiation levels" should be required around the site. Given this assertion, indicate whether you agree that Applicants' proposed system is no less "capable" of reading gamma radiation levels than the system Palmetto Alliance proposes; and, if your answer is negative, indicate how you propose to demonstrate that real time monitors are more accurate. Provide the bases for your answer.
6. You have stated in your Supplemental response to Interrogatory 24 that the principal advantage of using real time monitors during emergency conditions at Catawba is that they provide "immediate information." Do you contend that the information provided by real time monitors is also


more accurate and/or more complete, or that its main advantage lies in its immediacy? Provide the bases for your answer.

7. Do you contend that both "real time monitors" and TLD's are capable of detecting and measuring "gamma emitting radionuclides that may be attributable to [effluents] from the facility?"
8. Please provide the title and specific page references to the NRC Branch Technical Position to which you refer in your Supplemental Response to Interrogatory 48, explain fully its recommendations as to the number of TLDS and real time monitors which should be used for off-site monitoring purposes, and indicate whether you contend that these recommendations should be adopted as a minimum standard. Provide the bases for your answer.
9. Explain fully why you contend that the off-site monitoring system used by Applicants is "inadequate" to provide "reliable and timely information as to the magnitude and dispersion of an atmospheric release of radiation" (see Palmetto Alliance's Supplemental Response to Interrogatory 60). Provide the bases for your answer.
10. Explain precisely what you mean by the terms "magnitude and dispersion of an atmospheric release of radiation," and how you contend that real time monitors will provide "reliable and timely" information on these aspects of a radiological release. Provide the bases for your answer.
11. In view of your statement in your Supplemental Responses to Interrogatories 48, 51 and 53 that Palmetto Alliance is not prepared to specify how many real time monitors should be used, or the configuration of such monitors, or where on the site (defined in response to Interrogatory 56 as within the boundaries of the property owned and controlled by Duke Power Company) such monitors should be located, is it accurate to say that what Palmetto Alliance contends is necessary is an onsite gamma radiation monitoring system of real time monitors adequate to provide "reliable and timely information as to the magnitude and dispersion of an atmospheric release of radiation in the event of an accident?"
12. In view of your Supplemental Response to Interrogatory 19, do you contend that the information provided by real time monitors (as described in your Supplemental Response to Interrogatory 60) is available from other types of monitoring systems, such as that proposed by Applicants?
13. Your Supplemental responses to Interrogatories 24 and 87 appear somewhat inconsistent. Clarify whether or not you contend that "the accuracy of real time monitoring is superior to that of the TLD . . .," and, if your answer is affirmative, provide the specific basis for your assertion that real time monitors are "significantly" more accurate.
14. In your Supplemental Response to Interrogatory 90, you state that "TLDS require significant time after exposure for retrieval and processing" Specify the amount of time you contend is needed after exposure for retrieval and processing, and provide the basis for your answer.

CONTENTION 44

Applicants are unable at this time to file any supplemental interrogatories on Contention 44, because they have not yet received any answers from Palmetto Alliance on Applicants' original set of interrogatories on this contention. (See Applicants April 29, 1983 "Motion to Compel," pp. 41-42 of Appendix). Applicants accordingly serve notice that they reserve the right to file follow-up interrogatories on Contention 44 after they receive responsive answers from Palmetto Alliance.

Respectfully submitted,



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May 4, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Follow-Up Interrogatories to Palmetto Alliance on Contentions 6, 7, 8, 16 and 27 in the above captioned matter have been served upon the following by deposit in the United States mail this 4th, day of May 1983.

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