

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

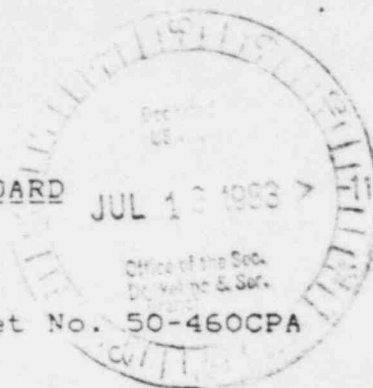
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

WASHINGTON PUBLIC POWER SUPPLY SYSTEM  
et. al.

(WPPSS Nuclear Project No. 1)

Docket No. 50-460CPA



COALITION FOR SAFE POWER THIRD SET OF INTERROGATORIES  
TO APPLICANT, JULY 13, 1983.

Pursuant to Commission rules, 10 C.F.R. 2.740b and 10 CFR 2.741, intervenor Coalition for Safe Power hereby requests that the Applicant answer each of the following interrogatories separately and fully in writing and under oath, and to produce the documents as requested. In answering these interrogatories, applicants is requested to furnish all information available to applicant, however obtained, including hearsay, and including information known by or in the possession of applicant's employees, agents and attorneys or appearing in applicant's records.

If unable to answer the following interrogatories in full after exercising due diligence to do so, so state and answer to the extent possible, specifying the inability to answer the remainder, stating whatever information or knowledge is had concerning the unanswered portion and describing the efforts to secure the unknown information.

Information sought by these interrogatories obtained after service of answers shall be disclosed to the intervenors by supplementary or amended answers within a reasonable time after such information is obtained, as

required by 10 CFR 2.740(e).

In each response, identify any documents used in answering the interrogatory. As used herein, the term "documents" means all writings of every kind, both originals and copies, including but not limited to, correspondence, letters, memoranda, notes, reports, papers, studies, analyses, surveys, test results, books, records, contracts or agreements, telegrams and other communications sent or received, transcripts of meetings, hearings or statements, computer printouts, maps, charts, graphs, drawings, tables, calculations and computations, and printed or published matter. The term "documents" also includes voice recordings, films, tapes, photographs and other data compilations from which information can be obtained, including materials used in data processing.

INTERROGATORY 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.

INTERROGATORY 2: Provide a list of and make available all documents received by the Applicant from the Bonneville Power Administration (BPA) from January 1, 1981 to the present regarding the anticipated cessation and actual cessation of construction activity at WNP-1, including the placing of the project in a mothballed, deferred or preserved state.

INTERROGATORY 3: Provide a list of and make available for inspection and copying all documents provided by Applicant to the BPA from January 1, 1981 to the present regarding the anticipated cessation and actual cessation of construction activity at WNP-1, including the placing of the project in a mothballed, deferred or preserved state.

INTERROGATORY 4: What are the "current conditions" referred to by Licensee in its response to Intervenor's Second Set of Interrogatories, Nos. 14 and 24, which affect the determination that an extension to 1991 is for a "reasonable period of time"? Provide this information in a list format, with the greatest specificity possible and refer to all the documents which are relied upon as a basis for each condition.

INTERROGATORY 5: Provide all materials and documents used by the BPA to prepare the "Analysis of Alternatives Related to WNP-3, May 26, 1983" by the BPA (hereinafter referred to as the WNP-3 Decision Document) which bear in any way upon the deferral of construction on WNP-1.

INTERROGATORY 6: Provide all materials and documents used by the BPA to prepare the "Analysis of Resource Alternatives" dated April 19, 1982 by the BPA (hereinafter referred to as the WNP-1 Decision Document).

INTERROGATORY 7: Explain why the Applicant believes need for power and financing are not issues to be considered in this proceeding taking into account item 6 on page 2 of Applicant's letter dated January 11, 1983 requesting an extension for the completion date for WNP-1 (and used subsequently as the basis for the NRC Staff SER and Order, dated June 16, 1983) which states: "recommendations of the BPA to WPPSS that the construction on WNP-1 be delayed for an additional period of two to five years (beyond June 1, 1986) due to load/response/balance/changes and economic factors identified in the BPA's report 'Analysis of Resource Alternatives' dated April 19, 1982." (emphasis added).

INTERROGATORY 8: Identify what obstacles exist to financing for WNP-1 including any or all elements of the BPA recommendation, how such obstacles prevent financing, the anticipated time for each obstacle to be overcome, and what must occur for each obstacle to be overcome. Explain how all obstacles will be overcome in a "two to five year" period following the date of cessation of construction.

INTERROGATORY 9: Which of the scenarios presented in Table III.C.1 of the WNP-3 Decision Document was chosen in July 9, 1983 by the WPPSS Executive Board/Participants Committee/WPPSS Board of Directors?

INTERROGATORY 10: Does the Applicant believe that the restart of construction of WNP-1 is tied in any way to the

use of BPA revenues for any of the net-billed projects? Does BPA believe that the restart of construction of WNP-1 is tied in any way to the use of BPA revenues for any of the net-billed projects? If so, provide the legal basis for use of such funds.

INTERROGATORY 11: If the answer to Interrogatory 10 above is yes and the answer to Interrogatory 9 above is scenario 2a, 2e or 2f, what impact would Applicant anticipate on the restart of construction of WNP-1 from a ruling that use of BPA revenues for construction or rampdown was illegal, including the effects on the rampdown or construction of WNP-3?

INTERROGATORY 12: BPA states in the WNP-3 Decision Document that the restart of construction of WNP-1 is tied to the restart of construction of WNP-3. Does Applicant agree or disagree with this position? Explain fully and provide the basis for the response.

INTERROGATORY 13: What effect would there be on the restart of construction of WNP-1 if it were determined that there had been a misallocation of funds on the WNP-1/4 projects such that such funds would have to be repaid to the WNP-4/5 Participants by WPPSS?

INTERROGATORY 14: Taking into consideration the statements in the WNP-3 Decision Document that deferral of



construction of WNP-3 for a minimum of three years will lead invariably to an additional deferral of WNP-1 for 2 to 7 years (for a total of 5 to 12 years) and the fact that WPPSS deferred construction of WNP-3 for "three years" on July 8, 1983 what is the basis for Applicant's statements to the NRC that the deferral of WNP-1 is for 2 to 5 years? What is Applicant's basis for claiming that 2 to 5 years is a "reasonable period of time"? Does Applicant contemplate an amendment to their current application for a construction permit extension? If not, why not? Provide all documents related to the responses in this interrogatory including internal memoranda, notes, minutes etc.

INTERROGATORY 15: Does the Applicant disagree with the results of the "WNP-1 vs. WNP-3 Restart Sensitivity Analysis" presented in Table IV.K.1 of the WNP-3 Decision Document which concludes that a restart of WNP-3 is preferred to WNP-1? If so, what specific considerations does Applicant consider are wrong, and in what way?

INTERROGATORY 16: Upon what factors does the restart of construction of WNP-3 rely? What obstacles exist? When and how are these obstacles expected to be overcome?

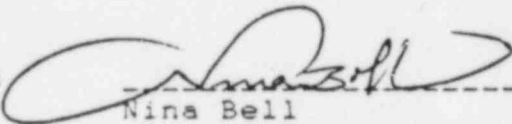
INTERROGATORY 17: Provide the minutes of all meetings of the WPPSS Board of Directors at which the delay of WNP-1 was discussed.

INTERROGATORY 18: Provide the minutes of all meetings of the WNP-3 Participants Committee at which the delay of WNP-1 was discussed.

INTERROGATORY 19: Does the Applicant agree or disagree with the statement by the NRC Staff in its response to Intervenor's First Set of Interrogatories, No. 41, that: "Need for power has some significance in this proceeding only because it has been raised as among the reasons for the BPA recommendation to defer construction. The Permittee offers the BPA recommendation as one of the factors constituting "good cause" to extend the plant completion date."? Explain fully your response.

Respectfully submitted,

Dated this day, the 13th  
of July, 1983.

  
Nina Bell  
Coalition for Safe Power