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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
Philadelphia Electric Company)	Docket Nos. 50-352
)	50-353
(Limerick Generating Station,)	
Units 1 and 2))	

APPLICANT'S FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO LIMERICK ECOLOGY ACTION

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740b, and the Atomic Safety and Licensing Board's Second Special Prehearing Conference Order (July 26, 1983), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatories to Limerick Ecology Action ("LEA") to be answered fully in writing, under oath, in accordance with the definitions and instructions below.

Additionally, pursuant to 10 C.F.R. §2.741, Applicant requests that intervenors produce for inspection and copying (or provide copies of) those documents designated by intervenors in their respective answers below.

Definitions and Instructions

1. For each interrogatory, please state the full name, work address, and title or position of each person providing information for the answer to the interrogatory.

2. The following definitions shall apply:

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- a. "Intervenor" shall refer to LEA or any officer, member, employee or consultant thereof.
- b. "Document" shall mean any written, printed, typed or other graphic matter of any kind or nature, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of intervenor, or its officials, employees, or agents; it shall also mean all copies or drafts of documents by whatsoever means made.
- c. "Date" shall mean the exact day, month and year, if ascertainable, or, if not ascertainable, the best approximation (including the event's relationship to other events in the relevant context of the interrogatory).
- d. "NRC" or "Commission" shall mean either the Atomic Energy Commission or the Nuclear Regulatory Commission, as appropriate, including its regulatory staff and adjudicatory boards, as indicated by the context of the interrogatory.
- e. "Specify", when referring to a proceeding before the Nuclear Regulatory Commission, means that the answer shall set forth the proceeding, applicant, docket number,

relevant date, and any other descriptive information appropriate to the request.

- f. "Specify" or "identify", when referring to an individual, corporation, or other entity, means that the answer shall set forth the name, present or last known work address, and, if a corporation or other entity, its principle place of business or, if an individual, his or her title or titles and employer. Once an individual corporation or other entity has been thus identified in answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation or other entity to state merely his, her or its name.

3. These interrogatories request all knowledge and information in intervenor's possession and/or knowledge and information in the possession of intervenor's agents, representatives, consultants, and, unless privileged, attorneys.

Interrogatories

1. State whether you intend to present any expert witnesses on the subject matter at issue in Contentions I-8 or I-15. If so, identify each such expert witness and further state (a) his professional qualifications; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the

expert is expected to testify; (d) the grounds for each opinion. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this (these) subject(s).

2. Identify by title, author, publisher and date of issuance or publication, all documents that you rely upon as a basis for your contentions or that you intend to use (by way of reference or evidentiary proffer) in presenting your direct case on Contentions I-8 or I-15 and all documents to which you intend to refer in conducting cross-examination of other witnesses who may testify in connection with any such contention(s).

3. To the extent that your answer to any interrogatory is based upon one or more documents, (a) identify each such document on which your answer is based; (b) identify the specific information in such document upon which you rely; (c) explain how such information provides a basis for your answer.

4. To the extent that your answer is based upon any study, calculation, research or analysis, (a) describe the nature of the study, calculation, research or analysis and identify any documents which discuss or describe the study, calculation, research or analysis; (b) identify the person(s) or entity(ies) who performed the study, calculation, research or analysis; (c) describe in detail the information which was the subject of the study, calculation, research or analysis; (d) describe the results

of such study, calculation, research or analysis; (e) explain how such study, calculation, research or analysis provides a basis for your answer.

5. To the extent that your answer is based upon conversations, consultations, correspondence or other communications with one or more individuals or entities, (a) identify each such individual or entity; (b) state the educational and professional background of each such individual, including occupation and institutional affiliations; (c) describe the nature of each communication, including time and context, and describe the information received from each such individual or entity; (e) explain how such information provides a basis for your answer.

Contention I-8

6. Specify all applicable NRC regulations, General Design Criteria or other regulatory requirements or guidance, or portions thereof, pertaining to loss of offsite power ("LOOP") events which intervenor asserts are applicable to Limerick.

7. Specify each section of the Limerick Final Safety Analysis Report ("FSAR"), Probabilistic Risk Assessment, or Severe Accident Risk Assessment or other correspondence with the NRC, including Applicant's response to Staff questions, which intervenor asserts may be relevant to consideration of LOOP events and specify, to the extent applicable, any failure to meet the regulatory requirements set forth in response to Interrogatory 6.

8. Specify each initiating event which intervenor asserts would lead to a LOOP event at Limerick and, as applicable, specify the compensating measure which intervenor asserts is required at Limerick such that the Station is designed to withstand the LOOP event.

9. Identify all LOOP events at nuclear or other power plants upon which you rely for statistical or other data in support of this contention and provide the date of the event, a description of the facility, number of offsite lines available, duration of the LOOP and its cause.

10. Describe any studies, including assumptions, methodology and results regarding the reliability of the offsite power system for Limerick, or of the PJM interconnection which you have conducted or reviewed in connection with this contention, whether or not supportive of your position.

Contention I-15

11. Specify all applicable NRC regulations, General Design Criteria or other regulatory requirements or guidance, or portions thereof pertaining to leakage past closed main steam isolation valves which intervenor asserts are applicable to Limerick.

12. Specify each section of the Limerick FSAR, including Applicant's response to Staff questions, which intervenor asserts may be relevant to consideration of leakage past closed main steam isolation valves and specify,

to the extent applicable, any failure to meet the regulatory requirements set forth in response to Interrogatory 11.

13. Specify all facts upon which intervenor relies to assert that leakage past closed main steam isolation valves would be a problem for Limerick in meeting any NRC regulatory requirements or guidance.

14. Specify the compensating measures intervenor asserts should be taken in response to any problems identified in Interrogatory 13 above, including the factual basis for such assertion.

CONNER & WETTERHAHN, P.C.

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn", written in a cursive style.

Mark J. Wetterhahn
Counsel for the Applicant

August 12, 1983

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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's First Set of Interrogatories and Request for Production of Documents to Limerick Ecology Action," dated August 12, 1983, in the captioned matter have been served upon the following by deposit in the United States mail this 12th day of August, 1983:

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