

THE STATE OF NEW HAMPSHIRE

CONSUMER ADVOCATE  
MICHAEL W. HOLMES



ASSISTANT CONSUMER ADVOCATE  
JOSEPH W. ROGERS

OFFICE OF THE CONSUMER ADVOCATE  
8 OLD SUNCOOK ROAD  
CONCORD, NEW HAMPSHIRE 03301-5185

(603) 271-1172

10 June 1991

Edward A. Haffer, Esq.  
Sheehan Phinney  
Bass & Green, PA  
1000 Elm Street  
P.O. Box 3701  
Manchester, NH 03105-3701

RE: NDFC 91-1

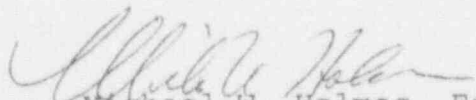
Dear Mr. Haffer:

Attached you will find the Office of the Consumer Advocate's additional data requests in the above styled docket. The attached discovery are directed at the following New Hampshire Yankee witnesses:

1. Thomas S. LaGuardia  
(including cost study by TLG Engineering, Inc.)
2. Vincent P. Wright
3. Judith C. Dunn

Please contact me should you have any questions whatsoever concerning the interpretation of the attached.

Sincerely,

  
Michael W. Holmes, Esq.

Enclosures  
CC: Service List

9106260198 910610  
PDR ADDCK 05000443  
P PDR



50-443  
Tm

2/P  
FG

50-443

Appl

STATE OF NEW HAMPSHIRE

PUBLIC UTILITIES COMMISSION

Office of the Consumer Advocate

Additional Data Requests

The following data requests pertain to the testimony and cost study of Thomas S. LaGuardia and TLG Engineering, Inc.:

1. Please refer to page 9 @ 12-21 of Mr. LaGuardia's Direct Testimony. With specific reference to the statement:

"...there are efforts underway to develop multiple new regional facilities. Unfortunately, although cost projections for these new regional facilities are substantially higher than the fees being currently charged for low level waste disposal, the final pricing structure is still an unknown. In addition, the fees that will be charged by a facility's operator will depend upon a number of site specific factors,...As such, for a cost study, the waste disposal cost is directly related to the assumptions used on the location and type of facility selected as the destination.

- a. Please indicate:

- i. who is in charge, by region for the US, of efforts to develop multiple new regional facilities.
- ii. what is the status of these efforts,
- iii. the documentation for Mr. LaGuardia's basis for this statement and
- iv. what Mr. LaGuardia believes are reasonable upper limits on the "final pricing structure".

- b. Please indicate where NH low-level waste is disposed of at present.

- c. Please indicate if Mr. LaGuardia is aware of a model designed by EG&G Inc. for the DOE for the expressed purpose of forecasting low-level waste costs.

RE: NDFC 91-1

Additional Discovery Requests to New Hampshire Yankee

1. Please refer to page 10 @ 1-6 of Mr. LaGuardia's Direct Testimony. With specific reference to the statement:

"In an EPRI report, the principle investigator J.N. Vance, calculated the value of \$139/cubic foot as being a reasonable basis for projecting costs for the disposal of low level waste resulting from the decommissioning of Seabrook Station. This value is a factor over four times higher than that used in the earlier estimate."

Please indicate how sensitive the J.N. Vance study is to the development of future facilities. In addition, please indicate the forecasted volume of low-level waste emmitted from Seabrook Station for every year until 2036.

RE: NDFC 91-1

Additional Discovery Requests to New Hampshire Yankee

The following data requests pertain to the testimony of  
Vincent P. Wright:

1. Please refer to page 2 of Mr. Wright's testimony. Please provide the supporting documentation for the statement: "Experienced engineers have suggested that waste disposal has escalated in very recent times by as much as three or four times the current inflation rate." Also please provide the support for the statement that "...the situation stabilizes [at] a rate of 4.10% for the balance of the 46 years."

RE: NDFC 91-1

Additional Discovery Requests to New Hampshire Yankee

The following data requests pertain to the testimony of  
Judith C. Dunn:

1. Please provide the status of Congressional legislation permitting NDT's to invest in taxable investments while remaining tax-exempt.