

THE STATE OF NEW HAMPSHIRE

CONSUMER ADVOCATE
MICHAEL W. HOLMES



OFFICE OF THE CONSUMER ADVOCATE
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27 May 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 second set of discovery requests ("OCA Set 2"), in the above styled docket. The attached discovery pertain to the following New Hampshire Yankee witnesses:

1. Thomas S. LaGuardia
(including cost study by TLG Engineering, Inc.)
2. Gary J. Caine

Please contact me or John Rohrbach, the OCA's economist (271-1175) should you have any questions whatsoever concerning the interpretation of the attached.

Sincerely,


Michael W. Holmes, Esq.

Enclosures
CC: Service List

9106260206 910527
PDR ADOCK 05000443
P PDR



JP 50-443
~~JP~~
Tony

ASSISTANT CONSUMER ADVOCATE
JOSEPH W. ROGERS

What is happening
is this hearing?
Will we be dragged
in?

FvK

51-443

Adol

STATE OF NEW HAMPSHIRE
PUBLIC UTILITIES COMMISSION
Office of the Consumer Advocate
Data Requests, Set #2

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

1. Please calculate the unfunded liability (in 1991 and 2023 dollars) of Mr. LaGuardia's proposal if the following scenario materializes:
 - a. Low-level waste burial costs are 100% greater than that assumed by Mr. LaGuardia.
 - b. The Decommissioning Fund turns out to just keep pace with the inflation forecast indicated by Mr. Caine.
 - c. Labor rates per worker double during the Decommissioning period.
 - d. Seabrook Unit One ceases operation after 35 years.
2. If permanent on-site storage for all waste is needed, would the DOE be responsible for funding storage of the hi-level portion? If not, would NHY then be responsible?
3. Please indicate at what rate the NRC believes low-level waste disposal will grow over the next 45 years.
4. Please refer to page 23 @ 20-22 of Mr. LaGuardia's testimony. Assuming that Mr. LaGuardia's instant testimony does not commit NHY to a choice of decommissioning, when does NHY plan to indicate to the NRC it's decommissioning choice?
5. Please refer to page 11 @ 20-24 and page 12 @ 1-6 of Mr. LaGuardia's testimony. Exactly what would be the "...cost impact on the decommissioning program envisioned for... Seabrook Station" if the spent fuel was presumed to be transferred to a dry storage system. What would the cost impact be if the DOE increased the storage period to 10 years, and no "dry cask storage system" materialized?

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Discovery Requests to New Hampshire Yankee
OCA Set 2

6. Please refer to page 21 of Mr. LaGuardia's testimony. Does Mr. LaGuardia's statement @ 1-3 mean that NHY has committed to the DECON "scenario"?
7. Please refer to page 15 @ 19-22 of Mr. LaGuardia's testimony. How sensitive is the cost flowing from the "...activity duration critical path..." to a doubling of the time required to dispose of the "...the Nuclear Steam Supply System (NSSS)..." What would that cost be?

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The following data requests pertain to the testimony of
Gary Caine:

1. Please refer to page 4 question 10 of Mr. Caine's testimony. Has Mr. Caine considered whether the same forces driving "municipal bonds [to] higher real rates of return than they have historically", would also drive prospective decommissioning costs to greater real rates of return than expected in Mr. LaGuardia's testimony, in effect negating the higher real rates of return expected by NHY.
2. Please refer to page 4 question 11 of Mr. Caine's testimony. Why is cost inflation for decommissioning activities expected to be only .25 percent?
3. Has Mr. Caine calculated the unfunded liability if the investment in Fund One and Fund Three just track inflation and Seabrook's operating life is 35 years? If so what is that number. Please provide any sensitivity analysis computed by Mr. Caine with regard to these two parameters.
4. RSA 162:F-19 states that the decommissioning fund "shall not be subject to any federal or state taxes". Is Mr. Caine of the opinion that the fund may be invested in taxable securities in light of RSA 162:F-19? Please explain.