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USNRC

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 JAN 23 P12:21

Before the Atomic Safety and Licensing Board

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)	
)	
Public Service Electric and)	Docket Nos. 50-354
Gas Company, <u>et al.</u>)	
)	
(Hope Creek Generating)	
Station))	

APPLICANTS' FIRST SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS
TO PUBLIC ADVOCATE

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740(b), and the Atomic Safety and Licensing Board's Special Prehearing Conference Order (December 21, 1983), Public Service Electric and Gas Company, et al. ("Applicants" or "PSE&G") hereby propound the following interrogatories to the Public Advocate of the State of New Jersey ("Public Advocate" or "intervenor") 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, Applicants request that the Public Advocate produce for inspection and copying (or provide copies of) those documents designated by intervenors in their respective answers below.

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Definitions and Instructions

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

2. The following definitions shall apply:

- a. "Intervenor" shall refer to the Public Advocate of the State of New Jersey, or any official, 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 advisory 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 business 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 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.
- g. "Basis" shall mean any document (as defined in 2(b) above), analysis, study, reference, or source upon which intervenor relies for any assertion in the contentions or which will be referred to or used in cross-examination of Applicants' witnesses.

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.

Contention 1

1. Specify all applicable NRC regulations, general design criteria, guidelines or other regulatory requirements, or portions thereof, pertaining to the phenomenon of intergranular stress corrosion cracking ("IGSCC") which intervenor asserts are applicable to the recirculation piping installed at Hope Creek.

2. Specify each section of the Hope Creek Final Safety Analysis Report ("FSAR"), including Applicant's response to Staff questions, which intervenor asserts is relevant to the consideration of the phenomenon of IGSCC in recirculation piping and specify, to the extent applicable, any failure to meet the regulatory requirements set forth in response to Interrogatory 1 above.

3. State the basis upon which intervenor relies for its assertion that Type 304 austenitic stainless steel piping in the reactor coolant pressure boundary of boiling water reactors is "highly" susceptible to stress corrosion cracking.

4. Specify and describe in detail in what way the Applicants have failed to demonstrate that they can prevent and mitigate IGSCC in accordance with 10 C.F.R. Part 50, Appendix A, Criterion 30, in the recirculation piping installed at Hope Creek.

5. Define "critical" as it is used in Contentio. 1.
6. Specify what recirculation piping intervenor considers to be "critical."
7. Specify what critical recirculation piping has not been identified by Applicants as susceptible to IGSCC.
8. Specify the basis upon which intervenor relies for the assertion that connections to the decay heat removal system are critical piping.
9. Specify the regulatory requirement and/or any other basis for intervenor's assertion that all recirculation piping susceptible to IGSCC must be replaced.
10. Specify the conditions under which intervenor asserts replacement is feasible.
11. Specify all preventive measures intervenor asserts Applicants should take prior to start-up.
12. Specify the preventive measures intervenor asserts should be taken prior to start-up for each designated "critical" component of recirculation piping but which have not yet been taken.
13. Specify the deficiencies intervenor alleges exist in the Applicants' system for identification of cracks in recirculation piping after start-up.
14. Specify those inspection techniques, other than manual ultrasonic testing, which intervenor asserts Applicants should use to identify recirculation piping susceptible to IGSCC after start-up.

Contention 2

1. Define "management implications" as used in this contention.

2. Specify each and every respect in which intervenor claims that PSE&G management in the administrative, procurement, maintenance and quality assurance programs for the Hope Creek Generating Station, as of this date, fails to meet all applicable regulatory requirements and license conditions imposed by the NRC.

3. As to each alleged deficiency, specify the applicable NRC requirement and/or license condition and describe in detail:

- a. The applicable NRC regulatory requirement or license condition;
- b. The precise management function(s) alleged to be deficient;
- c. The names and/or job titles of the particular PSE&G management officials with responsibilities for preventing or eliminating the deficiencies alleged;
- d. The acts or omissions performed by such individuals, identified by name or title, upon which intervenor relies in asserting that management deficiencies exist, including the date(s) of occurrence;
- e. The actions which should have been taken by such management officials identified above in

order to prevent or eliminate the alleged management deficiencies;

- f. All actions which intervenor contends must be taken with respect to PSE&G management prior to the issuance of an operating license for the Hope Creek Generating Station.

4. If intervenor contends that PSE&G is not technically qualified to engage in the activities to be authorized by an operating license for the Hope Creek Generating Station within the meaning of 10 C.F.R. §50.57(a)(4), specify and discuss in detail:

- a. The particular aspect as to which PSE&G lacks technical qualifications;
- b. The extent to which intervenor's claim is based upon any portion of the record of the application and, if so, identifying the particular portion(s) thereof;
- c. All actions which must be taken by PSE&G in order to eliminate any alleged deficiencies in its technical qualifications asserted above.

5. To the extent that intervenor relies upon the reactor trip circuit breaker failure at the Salem Nuclear Generating Station, Unit 1, on February 22 and 25, 1983, including all investigative and enforcement actions undertaken by the NRC with respect to those events, specify and describe in detail:

- a. Each particular finding or statement by the NRC upon which intervenor relies to establish a "management implication" for Hope Creek;
- b. The regulatory requirement or standard to which such statement or finding specified above applies;
- c. All actions which intervenor contends PSE&G must take with respect to each such statement or finding specified above in order to eliminate the alleged "management implication."

Contention 3

1. Specify all applicable NRC regulations, general design criteria, guidelines or other regulatory requirements, or portions thereof, pertaining to environmental qualification of safety-related electrical and mechanical equipment, components and subcomponents at the Hope Creek Generating Station.

2. Specify each section of the Hope Creek FSAR, including Applicant's responses to Staff questions, which intervenor asserts is relevant to the consideration of environmental qualification of safety-related electrical and mechanical equipment, components and subcomponents of the Hope Creek Generating Station.

3. Specify the deficiencies intervenor asserts to exist in the Applicants' environmental qualification program

outlined in the FSAR and amplified in answers to Staff questions.

4. Specify all safety-related electrical and mechanical equipment, components and subcomponents that intervenor alleges have not been or will not be environmentally qualified at the start of operation and/or throughout the operation of the plant.

5. Specify those regulatory requirements, or portions thereof, with which intervenor alleges Applicants do not comply.

Contention 4

1. Specify all applicable NRC regulations, general design criteria, guidelines or other regulatory requirements, or portions thereof, pertaining to the phenomenon of salt deposition from the operation of the Hope Creek cooling tower.

2. Specify each section of the Hope Creek Environmental Report-Operating License Stage ("EROL"), including Applicants' response to Staff questions, which intervenor asserts is relevant to the consideration of the phenomenon of salt deposition from the operation of the Hope Creek cooling tower.

3. Specify and describe in detail any environmental impact and/or long-term ecological effect on crop land and groundwater due to salt deposition from operation of the Hope Creek cooling tower that intervenor alleges Applicants have not adequately analyzed in the EROL.

4. Explain in detail why the Hope Creek EROL does not adequately analyze the environmental impacts of salt deposition.

5. Describe in detail how salt deposition from operation of the Hope Creek cooling tower will affect crop land and groundwater.

Request for Production of Documents

Please attach to your answer(s) to the interrogatories listed above a copy of all documents applicable to such answer(s), or upon which you otherwise intend to rely in the presentation of your direct case or in the examination of other witnesses. Alternatively, state that all such documents will be produced at a reasonable time and place to be agreed upon by the Applicants for inspection and copying.

CONNER & WETTERHAHN, P.C.

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January 20, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

Public Service Electric and)	
Gas Company)	
)	Docket No. 50-354-OL
(Hope Creek Generating)	
Station))	

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' First Set of Interrogatories and Request for Production of Documents to Public Advocate," dated January 20, 1984 in the captioned matter have been served upon the following by deposit in the United States mail on this 20th day of January, 1984:

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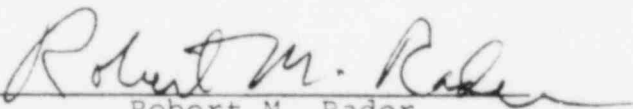
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