

RELATED CORRESPONDENCE
DOCKETED

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 FEB -9 AM 1:38

Before the Atomic Safety and Licensing Board

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

INTERROGATORIES AND REQUEST FOR PRODUCTION OF
DOCUMENTS OF THE CITY OF PHILADELPHIA TO
PHILADELPHIA ELECTRIC COMPANY ON SYSTEMS INTERACTION

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 Memorandum and Order (October 28, 1983), the City of Philadelphia ("City") hereby propounds the following interrogatories to Philadelphia Electric Company ("PECO") 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, the City requests that PECO produce for inspection and copying (or provide copies of) those documents designated by it in its 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.

D503

2. The following definitions shall apply:
- a. "PECO" shall refer to the Philadelphia Electric Company or any official, 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 and transcripts thereof, in the possession, custody, or control of PECO, or its officials, employees, or agents; it shall also mean all copies or drafts of documents by whatever 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 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 principal 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 PECO's possession and/or knowledge and information in the possession of PECO officials, officers, agents, representatives, consultants, and unless privileged, attorneys.

4. In each instance in which an interrogatory requests a statement of PECO's assertion, view or opinion, the answer shall also contain a full discussion of the factual basis for the assertion or opinion.

Interrogatories

31. State whether PECO intends to present any expert witnesses on the subject matter at issue in Contention I-41, as stated in Limerick Ecology Action's letter dated September 28, 1983 and admitted by the Licensing Board in its Memorandum and Order dated October 28, 1983 (slip op. at 1). If so, identify each expert

witness and 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 subject.

32. State whether PECO intends to present any factual witnesses on the subject matter at issue in Contention I-41. If so, identify each such factual witness and further state (a) his professional qualifications; (b) the subject matter on which the witness is expected to testify; (c) the substance of the facts to which the witness is expected to testify. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this subject(s).

33. Identify by title, author, publisher and date of issuance or publication, all documents that PECO relies upon as a basis for opposition to the contention or that PECO intends to use (by way of reference or evidentiary proffer) in presenting its direct case, in cross-examining other witnesses on Contention I-41, and all documents to which PECO intends to refer in conducting cross-examination of other witnesses who may testify in connection with any such contention.

34. 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 the information provides a basis for your answer.

35. 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.

36. To the extent that your answer is based upon conversations, consultations or correspondence or other communications with one or more individuals or entities, please 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.

37. To the extent that PECO possesses information or documents expressing facts or opinions which are relevant to the specific interrogatories below, but which do not oppose intervenor's position or which have not otherwise been fully provided in the answers thereto, please provide such information and documents.

38. Define how PECO uses the following terms in relationship to the Limerick Generating Station, giving the specific basis or reference for such definitions: (a) safety systems; (b) non-safety systems; (c) systems interaction; (d) systems interaction analysis; (e) failure combinations. If you are aware that any of the definitions utilized by you differs from one utilized by City or NRC, state the comparable definition and discuss the specific differences.

39. Specify each and every way or instance in which PECO has taken into account systems interaction in its analysis of the reliability of systems to determine whether there are reasonable assurances that the Limerick design adequately protects the public from credible accidents.

40. Specify each and every way or instance in which PECO has taken into account classification and qualification of systems important to safety in their analyses of the reliability of systems to determine whether there is reasonable assurance that the Limerick design adequately protects the public from credible incidents.

41. Specify each and every way or instance in which PECO has determined which is a proper sequence of accidents that should be considered within the design basis for Limerick.

42. Specify each and every way or instance in which PECO's determination of sequences of accidents to be included within the design basis of Limerick has taken into account systems interaction.

43. Specify each and every way or instance in which PECO's determination of sequences of accidents to be included within the design basis of Limerick properly takes into account classification and qualification of systems important to safety.

44. Specify each and every way or instance in which PECO adequately determined whether the design basis of the plant adequately protects against every such sequence determined by them to be within the design basis for Limerick.

45. Specify each and every way or instance in which PECO took into account systems interactions in the determination of the adequacy of protection for sequences of accidents which they have included within the design basis for Limerick.

46. Specify each and every way or instance in which PECO adequately took into account classification and qualification of systems important to safety in the determination of the adequacy of protection for sequences of accidents which it has included within the design basis for Limerick.

47. Specify each and every way or instance in which PECO adequately applied proper systematic methodology such as the fault tree and event tree logic approach to analyze the reliability of systems to determine whether there is reasonable assurance that the Limerick design adequately protects the public from credible accidents.

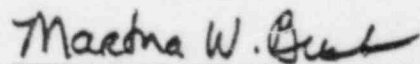
48. Specify each and every way or instance in which PECO adequately applied proper systematic methodology to analyze the reliability of systems to determine whether there is reasonable assurance that the Limerick design adequately protects the public from credible accidents.

49. Specify each and every way or instance in which PECO adequately identified the items for the Limerick Generating Station to which General Design Criteria 1, 2, 3, 4, 10, 13, 21, 22, 23, 24, 29, 35 and 37 apply and demonstrated compliance with these criteria.

Request for production of Documents

Please attach to your answers to the interrogatories listed above a copy of all documents applicable to such answer or upon which you otherwise intend to rely in the presentation of your direct case or in the cross-examination of other witnesses, whether or not they support your position on the contention. Alternatively, please state that all such documents will be produced at a reasonable time and place to be agreed upon by PECO for inspection and copying.

Respectfully submitted,



MARTHA W. BUSH
Deputy City Solicitor

Counsel for City of Philadelphia

February 6, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '84 FEB -9 A11:38

ATOMIC SAFETY AND LICENSING BOARD

BEFORE ADMINISTRATIVE JUDGES

DOCKETING & SERVICE
BRANCH

Lawrence Brenner, Chairman
Dr. Richard F. Cole
Dr. Peter A. Morris

In the Matter of : Docket Nos. 50-352-OL
PHILADELPHIA ELECTRIC COMPANY : 50-353-OL
(Limerick Generating Station, :
Units 1 and 2) :

CERTIFICATE OF SERVICE

I hereby certify that Interrogatories and Requests for Production of Documents of the City of Philadelphia to the Philadelphia Electric Company on Systems Interaction in the above-captioned proceeding have been served on the following persons named on the attached service list by hand delivery or by causing the same to be deposited in envelopes addressed to said persons, first class, postage prepaid, and deposited with the United States Postal Service at Philadelphia, Pennsylvania 19107.

Respectfully submitted,

Martha W. Bush

MARTHA W. BUSH
Deputy City Solicitor

Dated: February 6, 1984

Adm. Law Judge Lawrence Brenner
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Robert L. Anthony
103 Vernon Lane
Moyland, Pennsylvania 19065

Adm. Law Judge Richard F. Cole
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Phyllis Zitzer
Limerick Ecology Action
P.O. Box 761
Pottstown, Pa. 19464

Adm. Law Judge Peter A. Morris
Atomic Safety & Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Zori G. Ferkin
Assistant Counsel
Governor's Energy Council
1625 North Front Street
P.O. Box 8010
Harrisburg, Pa. 17125

Docketing & Service Section
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Frank R. Romano
61 Forest Avenue
Ambler, Pennsylvania 19002

Benjamin H. Vogler
O.E.L.D.
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Gregory Minor
MHB Technical Associates
1723 Hamilton Avenue
San Jose, CA 95125

Mark Wetterhahn, Esq.
Troy B. Conner, Jr., Esq.
Nils N. Nicholas, Esq.
Conner and Wetterhahn
1747 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Eugene J. Bradley
Philadelphia Electric Company
Associate General Counsel
2301 Market Street
Philadelphia, Pa. 19101

Edward G. Bauer, Jr.
Vice-President & General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pa. 19101

Marvin I. Lewis
6504 Bradford Terrace
Philadelphia, Pa. 19149

Mr. Vincent Boyer
Senior Vice President
Nuclear Operations
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pa. 19101

Frederic M. Wentz
County Solicitor
County of Montgomery
Courthouse
Norristown, Pa. 19404

Mr. J.T. Robb, N2-1
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pa. 19101

Angus Love, Esquire
101 East Main Street
Norristown, Pa. 19401

Hon. Lawrence Coughlin
House of Representatives
Congress of the United States
Washington, D.C. 20515

Joseph H. White, III
8 North Warner Avenue
Bryn Mawr, Pa. 19010

Frank Hippart, Director,
Pennsylvania Emergency
Management Agency, B-151
Transportation & Safety Building
Harrisburg, Pa. 17120

Steven P. Hershey, Esq.
Community Legal Services, Inc.
5219 Chestnut Street
Philadelphia, Pa. 19139

Roger B. Reynold, Jr., Esq.
324 Swede Street
Norristown, Pa. 19401

Robert L. Sugarman, Esq.
Sugarman & Denworth
Suite 510, North American Building
121 S. Broad Street
Philadelphia, Pa. 19107

Charles W. Elliot, Esq.
1101 Building
Easton, Pa. 18042

Jacqueline I. Ruttenberg
Keystone Alliance
3700 Chestnut Street
Philadelphia, Pa. 19104

Spence W. Perry, Esquire
Associate General Counsel
Federal Emergency Management Agency
Room 840
500 C St., S.W.
Washington, D.C. 20472

U.S.N.R.C. Region I
631 Park Avenue
King of Prussia, Pa. 19406

Thomas Gerusky, Director
Bureau of Radiation Protection
Dept. of Environmental Resources
5th Floor, Fulton Bank Bldg.
Third & Locust Streets
Harrisburg, Pa. 17120

Atomic Safety & Licensing
Appeal Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555