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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBefore 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 INTERVENOR
LIMERICK ECOLOGY ACTION ON CONTENTION I-42

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), 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:

- 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.

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

Interrogatories

1. State whether intervenor intends to present any expert witnesses on the subject matter at issue in

Contention I-42, as stated in your letter dated July 11, 1983 and admitted by the Licensing Board in its Memorandum and Order dated October 28, 1983 (slip op. at 2). 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.

2. State whether intervenor intends to present any factual witnesses on the subject matter at issue in Contention I-42. 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).

3. 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 or in cross-examining other witnesses on Contention I-42 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.

4. 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.

5. 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.

6. 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.

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

8. Specify each system, component or part of the Limerick Generating Station which intervenor asserts is "important to safety" within the meaning of 10 C.F.R. §50.49(b) which has not been included in Appendix B of the Environmental Qualification Report ("EQR") for Limerick. As to each such component or part, (a) describe in detail the component or parts and their exact location at the Limerick Generating Station; (b) identify the manufacturer, if known; (c) identify whether the component or part is asserted to be within the category "important to safety" because of its inclusion within 10 C.F.R. §50.49b(1)(2) or (3), describing in detail the reason for classification in one or more of these categories; (d) describe in detail the alleged "important to safety" function which the component or part will perform; (e) state the basis which the intervenor used in concluding that another system, component or part, or combination thereof, which is being qualified or which is not within a harsh environment cannot perform the function instead of the subject part or component; (f) state the

basis, if any, upon which intervenor asserts that environmental qualification of such component or part will not or could not be performed prior to fuel loading for Limerick Unit 1 or 2, as appropriate; (d) the exact event or events for which intervenor asserts that the equipment must be qualified, the time or times after the initiation of the most critical event during which the part or component is asserted to be necessary to operate, and the exact environmental conditions which the component or part would experience.

9. Identify any and all components or parts listed in Appendix B of the EQR which intervenor asserts will not be environmentally qualified by the time of fuel loading for each unit, giving the basis for such conclusion and stating when intervenor believes such part or equipment will be qualified, giving the basis for such conclusion or estimate.

10. With regard to each of the following parts, components, or systems which intervenor alleges should be included in the equipment qualification program, (1) feedwater control; (2) emergency lighting and communications systems; (3) plant process computer system; (4) computer software: (a) identify the exact systems, part or component involved, with reference to the description contained in the FSAR or P&I.D.'s, if possible; (b) identify the location or locations of the systems, parts or components at the Limerick Generating Station; (c) identify the conditions, e.g. LOCA or HELA; which intervenor asserts require that these systems

be qualified; (d) identify the operations that such equipment would have to perform for such conditions and the time frame in which these actions are required; (e) identify the harsh environment that such equipment, part or component would experience; (f) state intervenor's understanding of systems, equipment, parts or components which can perform functions equivalent to those identified above and which are either being qualified or are not located in a harsh environment and state why this other system, equipment, part or component is not sufficient to perform the intended function.

11. As to each "human interaction problem" which intervenor asserts should be addressed by Applicant in its Environmental Qualification Report for Limerick; (a) specify what is meant by the term "human interaction problem"; (b) identify the exact location of such component or part; (c) specify each component or part which intervenor alleges should be the subject of such a "human interaction review"; (d) identify the manufacturer of the part or component, if known; (e) specify the "important to safety" function which requires analysis of human interaction with regard to the particular part or component; (f) state the specific basis in NRC regulations or regulatory guidance for performing such a review as to the particular human interaction and part or component; (g) state the elements of the human interaction review, including goals, methodology, experimental work, studies, data analysis techniques and basis for

evaluating the results which intervenor asserts is necessary.

12. As to each component or part for which intervenor asserts that an Equipment Qualification Review Record ("EQRR") has not been provided in Applicant's Environmental Qualification Report for Limerick, (a) specify each part or component allegedly omitted; (b) identify the exact location of such component or part; (c) identify the manufacturer, if known; (d) state the basis upon which intervenor relies to assert that such part or component should have been included in an EQRR.

13. As to each part or component for which intervenor asserts that the EQRR specifies a qualified life of less than 40 years, (a) specify the part or component; (b) identify the manufacturer, if known; (c) the corrective action which intervenor asserts should be taken by Applicant to correct the alleged deficiency, the basis upon which the means for identification of such items by Applicant as discussed on page 8.2 of the Environmental Qualification Report is insufficient to meet NRC requirements.

14. State intervenor's basis for the assertion that the key switch in the control room for the standby liquid control system is in a harsh environment and thus subject to qualification pursuant to NRC requirements.

15. State what electrical equipment in the PASS system intervenor asserts must be qualified; specify how failure in such electrical equipment could mislead the operator.

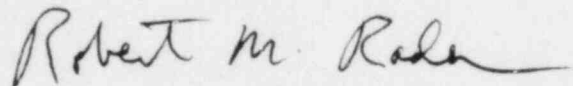
16. Identify each and every way which the document, Philadelphia Electric Company Q*5 Component Classification Program Rules fails to provide a methodology for assuring that equipment, parts or components falling in the definition of 10 C.F.R. §50.49(b) are not properly identified. The response to this interrogatory may contain proprietary material; if so, it should be sent only to Applicant's counsel in Washington, D.C.

Request for Production of Documents

Please attach to you 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 contentions. Alternatively, please state that all such documents will be produced at a reasonable time and place to be agreed upon by the Applicant for inspection and copying.

Respectfully submitted,

CONNER & WETTERHAHN, P.C.



Robert M. Rader
Counsel for Philadelphia
Electric Company

January 10, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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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 Intervenor Limerick Ecology Action on Contention I-42" dated January 10, 1984 in the captioned matter, have been served upon the following by deposit in the United States mail this 10th day of January, 1984:

Judge Lawrence Brenner (2)	Atomic Safety and Licensing
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Board	U.S. Nuclear Regulatory
U.S. Nuclear Regulatory	Commission
Commission	Washington, D.C. 20555
Washington, D.C. 20555	
Judge Richard F. Cole	Docketing and Service Section
Atomic Safety and Licensing	Office of the Secretary
Board	U.S. Nuclear Regulatory
U.S. Nuclear Regulatory	Commission
Commission	Washington, D.C. 20555
Washington, D.C. 20555	
Judge Peter A. Morris	Ann P. Hodgdon, Esq.
Atomic Safety and Licensing	Counsel for NRC Staff
Board	Office of the Executive
U.S. Nuclear Regulatory	Legal Director
Commission	U.S. Nuclear Regulatory
Washington, D.C. 20555	Commission
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* Hand Delivery
** Federal Express

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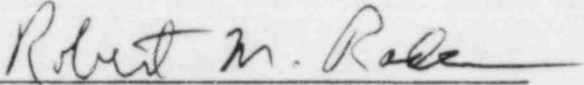
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