

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY & LICENSING BOARD

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In the Matter of

GULF STATES UTILITIES CO.,
Et al

DOCKET NOS. 50-458; 50-459 /oc

(River Bend Station, Units 1 & 2)

ANSWERS TO APPLICANT'S
FIRST SET OF INTERROGATORIES

The Joint Intervenors answer the applicant's first set of interrogatories, which pertain to Contentions Numbers 1 and 2, as follows:

1. Requires no answer.
2. Requires no answer.
3. Requires no answer.

4. The Joint Intervenors have not yet retained expert witnesses for Contentions Numbers 1 and 2. When the information requested in Interrogatory Number 4 is known by the Joint Intervenors, it will be provided to applicant.

5. The Joint Intervenors have not yet identified factual witnesses for Contentions 1 or 2. When the information requested in Interrogatory Number 5 is known by the Joint Intervenors, it will be provided to applicant.

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6. Insofar as Interrogatory Number 5 requests information to be used on cross-examination, it is objected to. However, the Joint Intervenors intend to use the current, or previous, versions of the RBS-FSAR and SER and those documents identified herein, among others. As other documents are identified, which will be used at the hearing, the information requested in Number 6 will be provided to applicant.

7. Requires no answer.

8. Requires no answer.

9. Requires no answer.

10. Requires no answer.

11. Intervenors are not obligated to do the Applicant's legal research. The contention is specifically addressed to the Applicant's compliance with I & E Bulletin 81-03, "Flow Blockage of Cooling Water to Safety Components by Corbicula (Asiatic Clam) and Mytilus (mussel)" and to "Report on Service Water System Flow Blockage by Bivalve Mollusks at Arkansas Nuclear one and Brunswick" by the Office for Analysis and Evaluation of Operational Data dated February, 1982. See also, Vol. 47, Federal Register, No. 92, Wednesday, May 19, 1982 Notices.

12. Intervenors are not obligated nor able to identify every written document which could be conceivably relevant to the claim inquiry. Without in any way limiting this response to these documents, intervenors call the attention of the applicant to their own letter dated February 14, 1983, which states in pertinent part, that GSU does not have sufficient data to make a detailed assessment of intrusion potential.

13. The applicant proposes a biofouling system consisting of chlorination with sodium hypochlorite. Chlorination may not be adequate in some systems. See "What Are We Doing About the Asiatic Clam", Energy Management, January, 1982; Good News: Corbicula Fluminea is Being Brought Under Control, Energy Management, July, 1982.

14. The applicant admits the clams are present in the river as is demonstrated by the Applicant's own monitoring. Whether or not clams presently exist at the site in sufficient quantity to present a problem is, in our opinion, a purely academic question as this clam has no enemies and is spreading throughout the area. Intervenor's are not aware of the experience of other plants on the Mississippi River with clams nor are they in a position to obtain this information easily. Intervenor's do not have this information.

15. See number 13 above.

16. See number 13 above.

17. This information is presently unknown to the applicant, as is indicated by their letter of February 14, 1983. Until the applicant is better able to respond, intervenor's will be unable to do so.

18. See number 14 above.

19. N/A

20. This question cannot be answered. See number 17 above.

21. This question cannot be answered. See number 17 above.

22. (a) Personal familiarity with the continuing problems of the Old River Control Structure obtained by living in the area.

(b) The intervenors are not obligated to do the research for the applicant to locate all such reports including those not published. Specifically, see the following:

(1) Louisiana Water Resources Research Institute Bulletin 12, September, 1980; "If the Old River Control Structure Fails", by R.G. Kazmann and D.B. Johnson.

(2) "Water on the Mississippi", Discover, March, 1983.

(3) Senate Hearings, "Old River Control Structure", 96th Congress.

(4) Rural Louisiana, "Taming Ole Man River", page 6-7.

(5) Please note that Rural Louisiana is published by the Louisiana Association of Electric Cooperatives (LAEC), a closely related entity of Applicant, Cajun Electric. LAEC is apparently of the opinion that the Old River Control Structure may not be salvagable.

23. This question asks the intervenors to generate mathematical probabilities which are based on such diverse factors as (1) meteorological conditions over the next 30 plus years; (2) the willingness of Congress to appropriate money; (3) soil conditions under the Old River Control Structure; (4) the ability of the U.S. Army Corps of Engineers given sufficient funding and numerous factors. Intervenors believe that such probabilities cannot be calculated to any meaningful accuracy.

24. See documents referred to in number 22 above.

25. Unknown. There are failures which cannot be repaired.

26. See number 22 above.

27. Unknown.

28. Unknown. Also, "Steady State Conditions" do not necessarily represent the point where River Bend would be affected. The question is rather, "At what point the salinity of makeup cooling water for the reactor would be affected".

29. Failure of the Old River Control Structure presents a long-term problem for the plant. It is not contended that the plant cannot be shut down safely assuming the adverse salinity conditions are identified. The contention is that the plant is not designed to operate with salt water and virtually every component of the cooling tower water system would be affected if the plant continued to operate under adverse salinity conditions. In addition, there could be a longer term adverse impact on well water used for the makeup water for the reactor condensate cycle. All regulatory requirements dealing with corrosion and state water quality criteria could potentially be violated.

30. All sections dealing with corrosion at all points of the plant cooling system.

31. This question cannot be fully answered at this time; however, at a minimum, facilities should be provided to desalinate cooling tower makeup water.

32. See the Kazmann and Johnson article referred in Number 22 above.

33. See number 22 above.

34. Obviously, the Mississippi River is not going to divert itself into the channel it now occupies.

35. See number 22 above.

36. Unknown. Potentially none at all.

37. Unknown, except that there would be a substantial increase.

Respectfully submitted,

Linda B. Watkins

LINDA B. WATKINS
Attorney at Law
355 Napoleon Street
Baton Rouge, LA 70802
504/343-3034

STEPHEN M. IRVING
Attorney at Law
355 Napoleon Street
Baton Rouge, LA 70802
504/346-8774

JAMES W. PIERCE
Attorney at Law
P. O. Box 23571
Baton Rouge, LA 70893
504/388-9574

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RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

Those documents identified herein will be made available at the office of Stephen M. Irving, Attorney at Law, 355 Napoleon Street, Baton Rouge, Louisiana, 70802 (One of the counsel for Joint Intervenors) on or after August 1, 1984.

Respectfully submitted,

Linda B. Watkins

LINDA B. WATKINS
Attorney at Law
355 Napoleon Street
Baton Rouge, LA 70802
504/343-3034

STEPHEN M. IRVING
Attorney at Law
355 Napoleon Street
Baton Rouge, LA 70802
504/346-8774

JAMES W. PIERCE
Attorney at Law
P. O. Box 23571
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that copies of "Answers to Applicant's First Set of Interrogatories" and "Response to Request for Production of Documents", in the above captioned proceeding, have been served on the following, by deposit in the U.S. mail, first class, postage pre-paid, correctly addressed to the last known address on this 24th day of July, 1984:

Dr. Richard F. Cole
Administrative Judge
Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

B. Paul Cotter, Jr., Chairman
Administrative Judge
Atomic Safety & Licensing
Board Panel
U.S. Nuclear Regulatory Comm.
Washington, D.C. 20555

Mr. Gustave A. Linenberger
Administrative Judge
Atomic Safety & Licensing
Board Panel
U.S. N.R.C.
Washington, D.C. 20555

William J. Guste, Jr.
Attorney General
State of Louisiana
234 Loyola Ave. 7th Floor
New Orleans, LA 70112

Troy B. Conner, Jr.
Mark J. Wetterhahn
Conner & Wetterhahn
1747 Pennsylvania Ave., NW
Suite 1050
Washington, D.C. 20006

James E. Booker
G.S.U.
P. O. Box 2951
Beaumont, TX 77701

Ian Douglas Lindsey, Esq.
David McNeil, Esq.
Staff Attorneys
La. Dept. of Justice
7434 Perkins Rd. Suite C
Baton Rouge, LA 70808

Gretchen R. Rotschild
Louisianians for Safe Ingery, Inc.
1659 Glenmore Ave.
Baton Rouge, LA 70808

H. Anne Plettinger
712 Carol Marie Dr.
Baton Rouge, LA 70806

Atomic Safety & Licensing
Appeal Board
U.S. N.R.C.
Washington, D.C. 20555

Docketing & Service Section
Office of the Secretary
U.S. N.R.C.
Washington, D.C. 20555

William F. Patterson
Counsel for NRC Staff
U.S. N.R.C.
Washington, D.C. 20555

Linda B. Watkins

LINDA B. WATKINS
On Behalf of Joint Intervenors