

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

RECEIVED

-1 01:03

In the Matter of:)
)
MISSISSIPPI POWER & LIGHT COMPANY,) Docket No. 50-416
 et al.) OLA
)
(Grand Gulf Nuclear Station, Unit 1))

LICENSEE'S FIRST SET OF INTERROGATORIES
TO JACKSONIANS UNITED FOR
LIVABLE ENERGY POLICIES (JULEP)

Pursuant to 10 C.F.R. §2.740b, and in accordance with the Licensing Board's Order dated April 23, 1984,^{1/} Licensees hereby serve this first set of interrogatories upon Intervenor, Jacksonians United for Livable Energy Policies ("JULEP"). These interrogatories relate to the two admitted contentions in this proceeding (Renumbered Contention 2 and Renumbered Contention 3), which in turn relate to Amendment No. 10 to the Grand Gulf, Unit 1 license.

INSTRUCTIONS

(a) Each interrogatory shall be answered in writing, under oath or affirmation, and each answer shall include all pertinent information known to JULEP, its officers, directors, members, employees, advisors, or counsel.

^{1/} "Second Order Following Prehearing Conference (Admitting Intervenor and Ruling on Contentions)," April 23, 1984, slip op. at 16-17.

8408020027 840730
PDR ADOCK 05000416
PDR

DS03

(b) In answering each interrogatory, please recite the interrogatory prior to each answer.

(c) Please state the full name, address, occupation, and employer of each person answering the interrogatories and designate the interrogatory or part thereof he or she answered.

(d) Where the name or identity of a person is requested in an interrogatory, please state in the answer the person's full name, address, employment, and telephone number.

(e) The term "document" as used in these interrogatories shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained.

(f) These interrogatories are continuing in nature. Thus, any time JULEP obtains further or different information, JULEP should supplement its previous response. JULEP should also supplement its responses as necessary with respect to the identity of each person expected to be called at the hearing as an expert witness, the subject matter of his or her testimony, and the substance of that testimony. This information is necessary to assure that Licensees have adequate time to prepare for hearing, including deposing such witnesses if Licensees decide depositions are appropriate.

(g) Pursuant to 10 C.F.R. §2.740b(b), JULEP should serve its answers within 14 days after service of the interrogatories.

INTERROGATORIES

A. Renumbered Contention 2

1. Is it JULEP's position that the exception to Technical Specification 4.0.4, allowing a required surveillance test of the ADS Trip System safety relief valves within 12 hours after the reactor attains the minimum pressure necessary to perform the test, is improper? Please specify in precisely what way you contend such is improper. Please explain precisely why, and on what grounds you contend it is improper. Does JULEP propose or recommend that the main steam safety/relief valves be stroked (tested) "dry," i.e., without steam flow subjecting valve parts, contrary to manufacturer's recommendations, to potential damage? Please identify all references which support your contention.
2. Is it JULEP's position that the 12 hour period allowed by Amendment 10 for the surveillance test is too long? If so, please:

- a. State whether the 12 hour time period involves an increase in the probability or consequences of an accident. Explain your answer and identify any such accident sequence and consequences.
 - b. State whether the 12 hour time period involves a reduction in a specific margin of safety. Explain your answer and identify any specific safety margins referred to.
3. Does or will JULEP propose a time period other than 12 hours after achieving minimum pressure in which the ADS Trip System surveillance test should be performed? If so, what is the time period?
4. Please identify each person whom you will call or are considering calling as a witness to the hearing on this contention. Further, with respect to each such person, please:
 - a. State the substance of the facts and opinions to which the witness is expected to testify.
 - b. Give a summary of the grounds for each opinion.
 - c. Describe the witness' educational and professional background.
5. Is JULEP's position on this contention based on one or more calculations? If so, please:
 - a. Describe each calculation and identify any document setting forth such calculation.
 - b. Identify who performed each calculation.

- c. State when each calculation was performed.
 - d. Describe each term or quantity used in each calculation and describe the source of your data.
 - e. State the results of each calculation.
 - f. Explain in detail how each calculation provides a basis for the contention.
6. Is JULEP's position on this contention based on one or more experiments or tests? If so, please:
- a. Describe each experiment or test and identify any document setting forth such experiment or test.
 - b. Identify who performed each experiment or test.
 - c. State when each experiment or test was performed.
 - d. Describe each parameter or variable measured in each experiment or test.
 - e. State the results of each experiment or test.
 - f. Explain in detail how each experiment or test provides a basis for the contention.
7. Is JULEP's position on this contention based upon conversations, consultations, correspondence, or any other type of communication with one or more individuals? If so, please:
- a. Identify each such individual.
 - b. State the educational and professional background of each such individual, including occupation and institutional affiliations.

- c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
 - d. Describe the information received from such individuals and explain how it provides a basis for the contention.
 - e. Identify each letter, memorandum, tape, note, or other record related to each conversation, consultation, correspondence, or other communication with such individual.
8. Is JULEP's position on this contention based on any experience at other nuclear power plants? If so, please:
- a. Identify the experience on which JULEP relies.
 - b. Describe how, in JULEP's view, such experience is relevant to the Grand Gulf Nuclear Station, Unit 1.
9. Is JULEP's position on this contention based upon any NRC Staff documents? If so, please identify the documents.
10. Is JULEP's position on this contention based upon any other documents? If so, please identify the documents.

B. Renumbered Contention 3

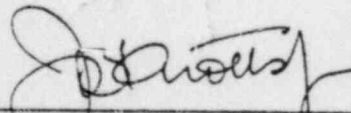
1. Is it JULEP's position that the exception to Technical Specification 4.0.4, allowing a required Scram Discharge Volume surveillance test within 72 hours after obtaining the control rod density necessary to perform the test, is improper? Please specify in precisely what way you contend such is improper. Please explain precisely why, and on what grounds you contend it is improper. Please identify all references which support your contention.
2. Is it JULEP's position that the 72 hour period allowed by Amendment 10 for the surveillance test is too long? If so, please;
 - a. State whether the 72 hour time period involves an increase in the probability or consequences of an accident. Explain your answer and identify any such accident sequence and consequences.
 - b. State whether the 72 hour time period involves a reduction in a specific margin of safety.
 - Explain your answer and identify any specific safety margins referred to.
3. Does or will JULEP propose a time period other than 72 hours after achieving the necessary control rod density in which the Scram Discharge Volume surveillance test should be performed? If so, what is the time period?

4. Please identify each person whom you will call or are considering calling as a witness at the hearing on this contention. Further, with respect to each such person, please:
 - a. State the substance of the facts and opinions to which the witness is expected to testify.
 - b. Give a summary of the grounds for each opinion.
 - c. Describe the witness' educational and professional background.
5. Is JULEP's position on this contention based on one or more calculations? If so, please:
 - a. Describe each calculation and identify any document setting forth such calculation.
 - b. Identify who performed each calculation.
 - c. State when each calculation was performed.
 - d. Describe each term or quantity used in each calculation and describe the source of your data.
 - e. State the results of each calculation.
 - f. Explain in detail how each calculation provides a basis for the contention.
6. Is JULEP's position on this contention based on one or more experiments or tests? If so, please:
 - a. Describe each experiment or test and identify any document setting forth such experiment or test.
 - b. Identify who performed each experiment or test.
 - c. State when each experiment or test was performed.

- d. Describe each parameter or variable measured in each experiment or test.
 - e. State the results of each experiment or test.
 - f. Explain in detail how each experiment or test provides a basis for the contention.
7. Is JULEP's position on this contention based upon conversations, consultations, correspondence, or other type of communication with one or more individuals? If so, please:
- a. Identify each such individual.
 - b. State the educational and professional background of each such individual, including occupation and institutional affiliations.
 - c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
 - d. Describe the information received from such individuals and explain how it provides a basis for the issue.
 - e. Identify each letter, memorandum, tape, note, or other record related to each conversation, consultation, correspondence, or other communication with such individual.
8. Is JULEP's position on this contention based on any experience at other nuclear power plants? If so, please:

- a. Identify the experience on which JULEP relies.
 - b. Describe how, in JULEP's view, such experience is relevant to the Grand Gulf Nuclear Station, Unit 1.
9. Is JULEP's position on this contention based upon any NRC Staff documents? If so, please identify the documents.
10. Is JULEP's position on this contention based upon any other documents? If so, please identify the documents.

Respectfully submitted,



Nicholas S. Reynolds
Joseph B. Knotts
David A. Reuka
Bishop, Liherman, Cock,
Purcell & Reynolds
1200 Seventeenth Street, N.W.
Washington, D.C. 20036
(202) 357-2800

Counsel for Licensees

July 30, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
MISSISSIPPI POWER & LIGHT)
COMPANY, et al.)
)
(Grand Gulf Nuclear Station,)
Units 1 and 2))

Docket No. 50-416

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensees' First Set of Interrogatories to Jacksonians United for Livable Energy Policies (JULEP)" was served upon the following by deposit in the United States mail on July 30, 1984:

Herbert Grossman, Chairman
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Docketing and Service
Branch
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. James H. Carpenter
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Peter A. Morris
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Atomic Safety and Licensing
Appeal Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

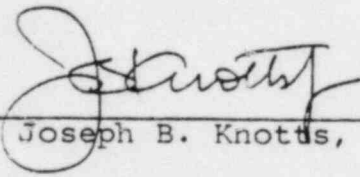
Mitzi Young, Esq.
Counsel for NRC Staff
Office of Executive Legal
Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Robert B. McGehee, Esq.
Wise, Carter, Child &
Caraway
600 Heritage Building
Jackson, Mississippi 39201

Mississippi Power & Light
Company
Attn: J. B. Richard
Senior Vice President - Nuclear
P.O. Box 1640
Jackson, Mississippi 39201

Cynthia Ann Stewart
Jacksonians United for
Livable Energy Policies
Route 3
Box 314W (Brame Road)
Jackson, Mississippi 39202

Ken Lawrence
Jacksonians United for
Livable Energy Policies
P.O. Box 3568
Jackson, Mississippi 39207



Joseph B. Knotts, Jr.