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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
1984

Before the Atomic Safety and Licensing Board

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

APPLICANT'S FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO THE CITY
OF PHILADELPHIA REGARDING OFFSITE EMERGENCY
PLANNING CONTENTIONS CITY-18 AND CITY-19

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 bench ruling on June 20, 1984 (Tr. 12,304 et seq.), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatories to the City of Philadelphia 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 the City of Philadelphia produce for inspection and copying (or provide copies of) those documents designated by the City 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.

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2. The following definitions shall apply:

- a. "Intervenor" shall refer to the City of Philadelphia, 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 adjudicatory boards, as indicated by the context of the interrogatory.
- e. "Specify," when referring to a proceeding means that the answer shall set forth the case name, parties, docket number, date of filing, decision or other 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 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.
- g. "Emergency plans" and "implementing procedures" shall refer to the most currently available version of the Radiological Emergency Response Plans for the Counties, Municipalities and School Districts within the plume exposure pathway EPZ for the Limerick Generating Station, the Commonwealth of Pennsylvania's Disaster Operations Plan - Annex E - Fixed Nuclear Facility Incidents, and all written procedures for the implementation of such plans. In accordance with intervenor's obligation to supplement its

answers, as discussed below in Instruction No. 5, intervenor shall amend its answers as appropriate based upon subsequent revisions of the plans as they become available.

- h. "EPZ" shall refer to the plume exposure pathway Emergency Planning Zone for the Limerick Generating Station.
- i. "Radiological emergency" shall refer to any event at the Limerick Generating Station which precipitates initiation of any emergency plan.

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. If any privilege is claimed, identify the privilege and the basis for its assertion.

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.

5. These interrogatories shall be deemed continuing in nature and require prompt supplemental answers should intervenor obtain or identify supplemental information or documents.

General Interrogatories

1. State whether you intend to present any expert witnesses on the subject matter at issue in intervenor's contentions. If so, identify each such expert witness and further state (a) the expert's business and residential addresses; (b) his professional qualifications; (c) the subject matter on which the expert is expected to testify; (d) the substance of the facts and opinions to which the expert is expected to testify; and (e) the grounds for each opinion. Identify by court, agency or other body, each proceeding in which such individual rendered testimony on this (these) subject(s).

2. State whether you intend to present any fact witnesses on the subject matter at issue in intervenor's contentions. If so, identify each such fact witness and further state (a) his business and residential addresses; (b) the subject matter on which the witness is expected to testify; (c) the substance of the factual testimony which the witness is expected to offer.

3. Identify by title, author, publisher and date of issuance or publication all documents that intervenor relies upon as a basis for its contentions, that it intends to use (by way of reference or evidentiary proffer) in presenting its direct case on its contentions, or that it intends to refer to in conducting cross-examination of other witnesses who may testify in connection with any such contentions.

Specific Interrogatories

4. Specify each particular per capita water use (e.g., personal consumption, personal hygiene and sanitation, and other uses) for which the City alleges that emergency planning measures must be taken. Specify the amount of water per capita needed to meet these uses.

1. As to each reservoir or other source of drinking water for the City of Philadelphia as to which the City contends that there is inadequate emergency planning, specify: (a) the name and location of the reservoir; (b) its yield and capacity; (c) the service area; (d) each interconnection with other reservoirs or water supply systems which could serve the same service area; (e) the source(s) of water used to fill the reservoir.

2. As to each such reservoir, describe in detail the mechanism for closing off the reservoir from its source(s) of water, including the time necessary to effectuate closure.

3. Describe in detail all other drinking water sources which the City of Philadelphia believes should be considered by emergency planners in substitution of contaminated or potentially contaminated City reservoirs.

4. Describe all efforts by the City to evaluate the practicality of obtaining water from such substituted sources, including all contacts with other governmental officials.

5. Describe all efforts by the City to evaluate the practicality of importation of water, including all contacts with other governmental officials.

6. Describe in detail the legal authority or other basis for action upon which the City would rely to ration water. Describe the procedures in place and those which must be taken to effectuate water rationing by the City in the event of a radiological emergency at Limerick.

7. Describe all efforts by the City to evaluate the practicality of rationing, including all contacts with other governmental officials.

8. Describe all efforts by the City to evaluate the practicality of substitution of other beverages, including all contacts with other governmental officials.

9. Describe all efforts by the City to evaluate the practicality of designation of critical users, including all contacts with other governmental officials.

10. Specify and describe in detail each emergency plan relating to the operation of any nuclear power plant in the United States which contains any provisions for providing an alternate source of water for a city or other governmental entity in the event of a radiological emergency.

11. Describe in detail all measures and methods for decontamination of the City's water supply and water supply system which the City asserts emergency planners should consider.

12. As to each measure or method described in Interrogatory 10, above, describe in detail all efforts by the City to evaluate its practicality from the perspective of cost, effectiveness, time necessary to implement and possible non-radiological side effects.

13. Describe in detail any contacts with private or governmental entities in considering, evaluating or proposing such alternatives for the City of Philadelphia, whether the alternative would be implemented by the City or some other entity.

14. Describe in detail each contact the City of Philadelphia has had with any representative of the Federal Emergency Management Agency, the Pennsylvania Emergency Agency, or any other governmental entity with functions or responsibilities relating to emergency planning as regards alternate sources of water for the City of Philadelphia and/or decontamination of the City's water supply and water supply system in the event of a radiological emergency. As to each such contact, identify each person involved, the date and nature of the contact, and the substance of the discussion.

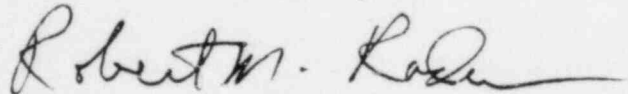
15. Describe in detail each contact the City of Philadelphia has had with any representative of private consultants or any other private entity or person with functions or responsibilities relating to emergency planning as regards alternate sources of water for the City of Philadelphia and/or decontamination of the City's water

supply and water supply system in the event of a radiological emergency. As to each such contact, identify each person involved, the date and nature of the contact, and the substance of the discussion.

Document Request

Please attach to intervenor's answer(s) to the interrogatories listed above a copy of all documents identified in the answers above, or upon which intervenor otherwise intends to rely in the presentation of its direct case or in the cross-examination of witnesses, or which otherwise relate to the City's contentions. Alternatively, 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.

CONNER & WETTERHAHN, P.C.

A handwritten signature in dark ink, appearing to read "Robert M. Rader", with a long horizontal flourish extending to the right.

Troy B. Conner, Jr.
Mark J. Wetterhahn
Robert M. Rader

Counsel for the Applicants

August 1, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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)	50-353
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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 the City of Philadelphia Regarding Offsite Emergency Planning Contentions City-18 and City-19," dated August 1, 1984 in the captioned matter have been served upon the following by deposit in the United States mail this 1st day of August, 1984:

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