

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

WASHINGTON PUBLIC POWER SUPPLY SYSTEM)
et. al.)

(WPPSS Nuclear Project No. 1))

Docket No. 50-460CPA

Young Wagner
Gray

INTERVENOR'S SECOND UPDATED RESPONSES TO APPLICANT'S FIRST SET OF
INTERROGATORIES, JULY 13, 1983.

INTERROGATORY 11: Why do you contend that Licensee has failed to establish good cause for an extension of the WNP-1 construction permit?

RESPONSE: There exists no good cause to extend the construction permit for WNP-1 because the power from the project will never be needed (in part due to its high cost), financing for the project will never be possible, BPA cannot be legally responsible for halting the project, and the period of time requested for the extension is entirely unrealistic and wholly impossible for WPPSS to meet.

INTERROGATORY 18: What is the basis for your response to interrogatories 16 and 17?

RESPONSE: "Northwest Conservation and Electric Power Plan", Volume I, April 27, 1983 by the Northwest Power Planning Council, Table 6-1, the "Analysis of Alternatives Related to WNP-3", May 26, 1983 by the Bonneville Power Administration, and page 28 of the "Model Electric Power and Conservation Plan for the Pacific Northwest", November 1982 by the Northwest Conservation Act

Coalition.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Nina Bell", is written over a horizontal dashed line.


Dated this day, the 13th
of July, 1983.

Nina Bell
Coalition for Safe Power

STATE OF OREGON)
) ss.
County of Multnomah)

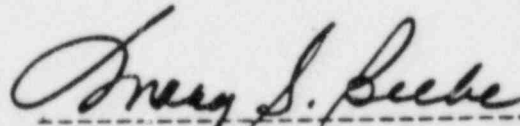
Nina Bell, being duly sworn, deposes and says:
That she is the Staff Intervenor of the Coalition for Safe
Power, and that the contents of "INTERVENOR'S UPDATED
RESPONSES TO NRC STAFF'S FIRST SET OF INTERROGATORIES, JULY
13, 1983" and "INTERVENOR'S UPDATED RESPONSES TO APPLICANT'S
FIRST SET OF INTERROGATORIES, JULY 13, 1983" are true and
correct to the best of her information, knowledge and
belief. All responses therein were prepared by herself and
Eugene Rosolie

Signed:



Nina Bell
Coalition for Safe Power

SUBSCRIBED AND SWORN to before me this 14th day of
July, 1983.



Notary Public for Oregon
My Commission Expires: 6-16-86

STATE OF OREGON)
) ss.
County of Multnomah)

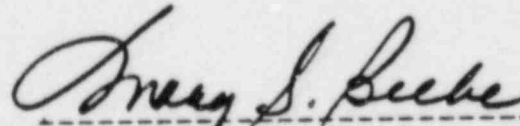
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That she is the Staff Intervenor of the Coalition for Safe
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belief. All responses therein were prepared by herself and
Eugene Rosolie

Signed:



Nina Bell
Coalition for Safe Power

SUBSCRIBED AND SWORN to before me this 14th day of
July, 1983.



Notary Public for Oregon
My Commission Expires: 4-16-86

without validity. Furthermore, continued construction of WNP-1 might bankrupt the region.

INTERROGATORY 13: What is the factual basis for your statement that "Petitioner...does not believe the power from WNP-1 will ever be needed"?

RESPONSE: The "Northwest Conservation and Electric Power Plan", Volume I, April 27, 1983 by the Northwest Power Planning Council, Table 6-1, and the "Model Electric Power and Conservation Plan for the Pacific Northwest", November 1982 by the Northwest Conservation Act Coalition (page 28)

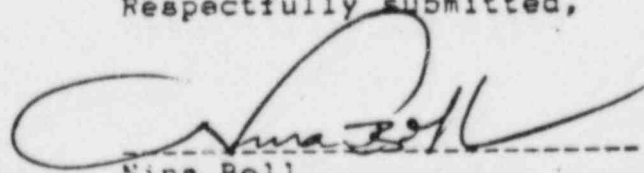
INTERROGATORY 14: Is it your contention that if and when the WNP-1 is completed and ready to operate, it will not be operated because there would be no need for the power?

RESPONSE: Yes.

INTERROGATORY 15: What factors do you contend are relevant in assessing whether power from WNP-1 will ever be needed?

RESPONSE: The factors listed in the "Northwest Conservation and Electric Power Plan", Volume I, April 27, 1983 by the Northwest Power Planning Council, the "Analysis of Alternatives Related to WNP-3", May 26, 1983 by the Bonneville Power Administration, the "Model Electric Power and Conservation Plan for the Pacific Northwest", November 1982 by the Northwest Conservation Act Coalition, and the "Analysis of Resource Alternatives" dated April 19, 1982 by BPA.

Respectfully submitted,



Dated this day, the 13th
of July, 1983.

Nina Bell
Coalition for Safe Power

Olympia, WA 98501) on or about June 10, 1983.

The legal basis identified by the intervenor to date is ALAB-722.

INTERROGATORY 11(b): If your answer to Interrogatory No. 11(a) is in the affirmative, set forth and explain fully the factual basis or legal authority for this contention.

RESPONSE: ALAB-722 establishes that the "ultimate 'good cause' determination is expected to encompass a judgement about why the plant should be completed and is not to rest solely upon a judgement as the applicant's fault for delay", "whether good cause exists to extend the construction completion date" and that "a judgement must still be made as to whether continued construction should nonetheless be allowed." The Appeals Board also discusses the temporary lack of need for power and lack of financing as factors which cause delay with valid business purposes. Intervenor sees a distinction between a "deferral" of need and a temporary lack of need or slowing of growth rate, with the former a more suitable description of the instant case.

INTERROGATORY 12: (a) Do you claim that the actual deferral in the need for power in the Northwest United States does not justify deferring construction of WNP-1?

(b) Explain fully your answer to Interrogatory No. 12(a).

(c) If your answer to Interrogatory No. 12(a) is in the affirmative, state the relevance of your statement that "Petitioner...does not believe the power from WNP-1 will ever be needed" to your claim that need for power in the Northwest United States does not justify deferring construction of WNP-1.

RESPONSE: (a) Yes. (b) The "deferral of need" justifies cancellation of the project not a deferral of construction. (c) If there is never a need for the plant, the plant should be cancelled, not deferred, because a plant's principle purpose is to provide needed electricity. The basis for the NRC's decision to grant WNP-1 a construction permit has proven to be totally