

C. Identify all other documents in the Staff's possession which pertain to the subject matter of the question.

D. Please make a copy of each document identified in parts C and D available in the Public Document Room. If any such document is not and will not be available for inspection in the Public Document Room, please provide a copy.

E. Identify the person providing the answer to the question. If more than one person answered the question, indicate the respective portions answered by each. In addition, identify all other NRC Staff or consultants who have the expert knowledge required to answer the question.

F. Explain whether the Staff is aware of any ongoing or planned research bearing on the question. Please identify such research.

G. Identify the employee(s) or consultant(s), if any, whom the Staff intends to have testify on the subject matter of the question. Provide a statement of the qualifications of such persons.

The term document is to be construed broadly to include all writings, whether handwritten or not. It includes documents from all sources, including those which were not prepared by or for the Staff, as well as those which were intended only for limited distribution, e.g., memos to the file and telecon notes. It also includes graphs, charts, and drawings of every kind.

Question 1. Please state the Staff's position on Contention 1 and set out the basis for this position.

2. To the Staff's knowledge, are there any other NRC licensing proceedings now pending in which a contention has been raised regarding the transportation of spent fuel? If so, please identify them.

3. Is it the Staff's position that it is important for VEPCO (for any reason) to maintain a "full core reserve" in its spent fuel pools? If not, why not? If so, please explain.

4. The following questions relate to VEPCO's application to the NRC for authority to construct a dry-cask storage facility at Surry.

a. What is the status of VEPCO's application?

b. What steps remain to be taken, by VEPCO or the Staff, before VEPCO's application can be granted?

c. When does the Staff expect that its review of VEPCO's application will be completed?

d. What is the planned capacity of facility?

e. Summarize the projected construction schedule for the facility, assuming that full NRC approval is received on (1) February 1, 1985 and (2) August 1, 1985.

f. Please identify all correspondence between VEPCO and the NRC pertaining to dry cask storage of spent fuel.

5. Has the Staff examined the proposed Surry-to-North Anna transportation route(s) to identify population centers, safe havens, traffic levels, road hazards, or environmentally sensi-

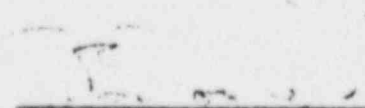
tive areas (such as drinking water supplies)? If so, please identify all documents pertaining to such examinations.

6. Has the Staff examined the proposed transportation route(s) to determine what kind of emergency response skills and equipment are possessed by the governmental departments and agencies that might be expected to respond in the event of an accident? If so, please identify all pertinent documents.

7. Please identify the shipping casks that VEPCO plans to use to transport spent fuel from Surry to North Anna. Have any defects or safety hazards ever been associated with these casks? If so, please explain.

8. In an affidavit dated December 21, 1982 and submitted to the Licensing Board by VEPCO on December 22, 1982, Marvin L. Smith referred to two "windows" during which it was important for VEPCO to make the proposed spent fuel shipments. Is it the Staff's position that similar windows will exist in the future? If so, please explain.

Respectfully submitted,


James B. Dougherty
Counsel for Concerned
Citizens of Louisa County

December 15, 1984

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

VIRGINIA ELECTRIC AND POWER CO.

(North Anna Power Station,
Units 1 and 2)

Docket Nos.

50-338 OLA-1

50-339 OLA-1

CERTIFICATE OF SERVICE

I certify that copies of the foregoing CONCERNED CITIZENS OF LOUISA COUNTY REQUEST FOR PRODUCTION AND INTERROGATORIES TO THE NRC STAFF were served, this 15th day of December, 1984, by deposit in the United States Mail, First Class, upon the following:

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