

January 4, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Before the Atomic Safety and Licensing Board

DEPUTY SECRETARY
DOCKETING SERVICE
ATLANTA

In the Matter of	:	
	:	
GEORGIA POWER COMPANY, <u>et al.</u>	:	Docket Nos. 50-424
	:	50-425
(Vogtle Electric Generating	:	
Plant, Units 1 and 2)	:	

APPLICANTS' THIRD SET OF INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

These interrogatories and this request for production of documents are directed to Joint Intervenors Campaign For a Prosperous Georgia/Georgians Against Nuclear Energy and pertain to contentions accepted by the Atomic Safety and Licensing Board in its Memorandum and Order on Special Prehearing Conference Held Pursuant to 10 C.F.R. § 2.715a, dated September 5, 1984. In that order the Board adopted a stipulation entered into by the parties that provided for two rounds of discovery. These discovery requests constitute the Applicants' second round of discovery requests on Contentions 7, 10.1, 10.3, 10.5, 10.7, 11, 12, and 14 and follow up on the discovery requests contained in Applicants' First Set of Interrogatories and Request

for Production of Documents, which were served on November 5, 1984 and responded to by the Intervenor on December 5, 1984.

The interrogatories are filed pursuant to 10 C.F.R. § 2.740b, which requires that they be answered separately and fully in writing under oath or affirmation. According to the stipulation of parties adopted by the Board, such answers shall be served within 30 days after service of the interrogatories. The interrogatories are intended to be continuing in nature, and the answers must be immediately supplemented or amended, as appropriate, should Intervenor obtain any new or differing information responsive to the interrogatories.

The request for production of documents is filed pursuant to 10 C.F.R. § 2.741, which requires that Intervenor produce and furnish copies of, or permit Applicants to inspect and copy, any documents that are responsive to the request and that are in the possession, custody, or control of Intervenor. In accordance with the stipulation of the parties and with 10 C.F.R. § 2.741, such production must be effected within 30 days after service of this request. The request for production of documents is also continuing in nature, and Intervenor must produce immediately any documents they obtain which are responsive to the request.

I. INSTRUCTIONS

The following instructions and definitions apply to Applicants' interrogatories and request for production of documents.

When identification of a document is requested, briefly describe the document (i.e., letter, memorandum, book, pamphlet, etc.) and state the following information as applicable to the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, the Applicants' identification number (for those documents that have been produced by Applicants to Intervenors in this proceeding), and the name and address of the person(s) having possession of the document. When identification of a person is requested, state that person's full name, present employer or business affiliation, present address, and present telephone number.

The following terms shall have the meaning indicated below:

1. "VEGP" means the Vogtle Electric Generating Plant, Units 1 and 2.
2. "Intervenors," "you," or "your" refers to Georgians Against Nuclear Energy (GANE) or Campaign for a Prosperous Georgia (CPG) and all members, employees, agents, consultants, attorneys, or other representatives of GANE or CPG.

3. "Correspondence" shall be construed broadly and shall mean letters; all recordings, transcriptions, and notes of telephone calls or conversations; inter-office and intra-office memoranda; telegrams; telex messages; notes; and reports.

4. "Document" means any handwritten, typed, printed, graphic, photographic, mechanically recorded, computer stored, filmed, or other verbal or pictorial matter of whatever character, however produced or reproduced, of any kind and description. "Document" shall also mean every copy of a document when such copy is not an identical duplicate of the original.

5. "CP-ER" refers to the VEGP construction permit stage Environmental Report.

6. "FSAR" refers to the VEGP Final Safety Analysis Report.

7. "OL-ER" refers to the VEGP operating license stage Environmental Report.

II. INTERROGATORIES

In answering each interrogatory, please recite the interrogatory before providing the response.

A. Specific Interrogatories

Contention 7 (Groundwater)

7-35. When Intervenorors state in their response to Interrogatory 7-1 that the Applicants use "insufficient and old reports" in assessing ground water conditions beneath Plant Vogtle are they referring to any studies or reports other than the 1943 study by C. W. Cooke, entitled "Geology of the Coastal Plain of Georgia?" If so, identify the author, date, and title of each such study or report.

7-36. Describe in detail how you contend the Applicants' use in the FSAR of water quality analyses that are thirteen years old would affect the validity of the Applicants' assessment of ground water conditions beneath the VEGP.

7-37. What is the basis for the Intervenorors' statement in their response to Interrogatory 7-1 that geophysical well logs from the State of Georgia Geological Survey and the U.S.G.S. "are extremely helpful in defining . . . the presence of radioactive materials"?

7-38. Explain in detail the basis for the statement in your response to Interrogatory 7-3 that the Savannah River Plant site has "a very similar hydrogeology to the Vogtle site."

7-39. What is the basis for the statement in your response to Interrogatory 7-4 that "groundwater at the SRP

is so grossly contaminated that it is now considered by the Environmental Protection Agency to be a source of pollution of surface streams"?

7-40. Based on the information available to you, what do you contend were the means by which contamination at the Savannah River Plant reached the Cretaceous (Tuscaloosa) aquifer?

7-41. Describe each "inadequacy of Applicants' Application" to which the Intervenor is referring in their response to Interrogatory 7-5.

7-42. Explain the basis for the statements made by both Intervenor in their respective Supplements to Petition for Leave to Intervene and Request for Hearing that the water table aquifer below the VEGP is a source of drinking water and agricultural supply.

7-43. Identify the location of all wells about which the Intervenor has information that draw water from the water table aquifer below VEGP for drinking water or agricultural supply purposes.

7-44. Explain the basis for the statements made by both Intervenor in their respective Supplements to Petition for Leave to Intervene and Request for Hearing that the water table aquifer below VEGP is used by some commercial establishments.

7-45. Identify the location of all wells about which the Intervenor has information that draw water from the

water table aquifer below VEGP for use by commercial establishments.

7-46. Explain the basis for the statement in your response to Interrogatory 7-10 that the "contamination of wells with contaminants from the cooling pond" that has occurred at the Savannah River Plant "could also occur at Plant Vogtle."

7-47. What "old and inadequate data" are the intervenors referring to in their response to Interrogatory 7-11?

7-48. Explain the basis for the statement in your response to Interrogatory 7-11 that "there is no such thing as a truly 'isolated' water table aquifer, as demonstrated at SRP and elsewhere," and identify those locations other than the Savannah River Plant to which you are referring.

7-49. Identify the "literature" to which you are referring in your response to Interrogatory 7-12 by author, title, date of publication, and specific page reference.

7-50. With respect to your statement in response to Interrogatory 7-16 that "the contamination could migrate . . . with or against the hydrolic flow," describe the specific migration paths and mechanisms by which you contend such migration could occur.

7-51. With respect to your statement in response to Interrogatory 7-16 that "the contamination could migrate . . . with or against the hydrolic flow," what do you contend would be the distance that such upgradient migration could be expected to travel on an annual basis? Explain how you calculated or determined your response.

7-52. Describe the specific migration paths and mechanisms by which you contend in your response to Interrogatory 7-18 that radioactive contaminants released to the water table aquifer beneath the VEGP could migrate in a direction other than Mathes (also known as Mallard) Pond.

7-53. Describe the specific migration paths and mechanisms by which you contend in your response to Interrogatory 7-18 that contaminants released to the water table aquifer beneath the VEGP could migrate to the Cretaceous (Tuscaloosa) aquifer and explain in detail how such contaminants would migrate through the marl underlying the plant site.

7-54. Identify the literature, documents, or other sources of information on which you base your responses to Interrogatories 7-50 through 7-53.

7-55. Identify the source of the estimate made by Savannah River Plant officials "that groundwater velocity would result in contamination taking one hundred to two hundred years to travel 1,500 feet," which you cite in your response to Interrogatory 7-20.

7-56. Explain in detail the basis for the contention in your response to Interrogatory 7-21 that the geology at Plant Vogtle is comparable to that of the Savannah River Plant.

7-57. Explain in detail the basis for the statement made in your response to Interrogatory 7-22 that with respect to the marl underlying the VEGP, "one point might be relatively resistant to penetration, another point within several feet might not be," and identify the specific locations beneath the VEGP site at which the marl is not resistant to penetration.

7-58. Identify the literature, documents, or other sources of information on which you base your contention that the marl underneath the Plant Vogtle site is not effectively impermeable.

7-59. Identify the specific page or section of the "Savannah River Plant L-Reactor EIS" to which you are referring in your response to Interrogatory 7-23.

7-60. Do the Intervenor contend that the pressure differential between the water table aquifer above the marl and the Tertiary aquifer or Cretaceous aquifer below the marl is not consistent or reverses at any point within the boundaries of the VEGP site? If so, explain the basis for that contention.

7-61. What is the location and designation of each of the six wells at the Savannah River Plant that you refer to in your response to Interrogatory 7-24?

7-62. Do the Intervenor's contend that the marl underlying the VEGP site is similar to a formation underlying the Savannah River Plant? If so, identify that formation and explain the basis for your response.

7-63. Explain in detail the basis for the statement in your response to Interrogatory 7-25 that the marl underlying the VEGP site has "permeable sections and fragments. In fact, there are places where the clay does not even exist." Identify the specific locations beneath the VEGP site where the marl has "permeable sections or fragments" or ceases to exist.

7-64. Identify the literature, documents, or other sources of information upon which you base the statement in your response to Interrogatory 7-25 that the marl underlying the VEGP site has "permeable sections and fragments. In fact, there are places where the clay does not even exist."

7-65. Do Intervenor's contend that the marl beneath the VEGP site contains fractures or permeable sections that would provide a path for migration of contaminants in the water table aquifer to the Tertiary or Cretaceous aquifers? If so, explain in detail the basis for this contention.

7-66. Provide responses to Interrogatories 7-13, 7-14, 7-15, 7-17, and 7-26 as promised in CPG/GANE'S Response to Applicants' First Set of Interrogatories and Request for Production of Documents.

7-67. Supplement your responses to Interrogatories 7-1, 7-2, 7-4, 7-5, and 7-18 based upon the information provided by the documents produced by the Applicants, as promised in CPG/GANE'S Response to Applicants' First Set of Interrogatories and Request for Production of Documents.

Contention 10.1 (Integrated Dose v. Dose Rate)

10.1-7. Describe each "inadequacy" of Applicants' application" to which the Intervenor is referring in their responses to Interrogatories 10.1-1 through 10.1-4.

10.1-8. Identify each specific PVC or polyethylene polymer that you refer to in your response to Interrogatory 10.1-1 as having been shown to be susceptible to differing dose-rate effects.

10.1-9. Supplement your responses to Interrogatories 10.1-1, 10.1-2, 10.1-3, and 10.1-4 based upon the information provided by the documents produced by the Applicants, as promised in CPG/GANE'S Response to Applicants' First Set of Interrogatories and Request for Production of Documents.

Contention 10.3 (Multiconductor Configurations)

10.3-9. Which specific references cited in "An Overview of Equipment Survivability Studies at Sandia National Laboratories," Proceeding, International Meeting of Light Water Reactor Severe Accident Evaluation, August 28-September 1, 1993 support the proposition that in tests of EPR cable material, multiconductor configurations performed "substantially worse" than single conductor configurations?

10.3-10. Do the Intervenor's contend that any EPR cable material other than a multiconductor cable manufactured by Anaconda Wire and Cable Co., which had EPR insulation and a chlorinated polyethylene jacket, has performed substantially worse in a multiconductor configuration than in the corresponding single conductor configuration in environmental qualification tests? If so, then identify any such EPR cable materials by manufacturer and cable type.

10.3-11. Provide responses to Interrogatories 10.3-3, 10.3-4, 10.3-5, and 10.3-7 as promised in CPG/GANE'S Response to Applicants' First Set of Interrogatories and Request for Production of Documents.

Contention 10.5 (Solenoid Valves)

10.5-9. With respect to your contention that "upon heating to 340 degrees F many ASCO solenoid valves failed

early," describe the conditions to which the valves had been subjected prior to being exposed to high temperatures.

10.5-10. In the Franklin Research Center tests, did the test temperatures to which the ASCO solenoid valves were exposed exceed 400 degrees Fahrenheit? If so, then state by how much the test temperatures exceeded 400 degrees Fahrenheit.

10.5-11. If your response to Interrogatory 10.5-10 is affirmative, then explain why the results of the Franklin Research Center tests are applicable to Plant Vogtle.

10.5-12. Do the Intervenor dispute the validity of the equipment qualification tests performed by ASCO as set out in AQS-21678/TR, Revision A and AQR-67368, Revision 1? If so, explain in detail the basis on which you dispute the validity of those tests.

Contention 10.7 (Hydrogen Recombiners)

10.7-4. Explain in detail the basis for the statement in your response to Interrogatory 10.7-1 that "the VEGP implies that the hydrogen recombiner was not qualified to radiation."

10.7-5. Do the Intervenor contend that environmental qualification testing of the components of the hydrogen recombiner used at the VEGP is not adequate to qualify the recombiner as a unit? If so, then explain in detail the basis for that contention.

Contention 11 (Steam Generator)

11-15. Provide responses to Interrogatories 11-3, 11-4, 11-5, 11-6, 11-7, 11-8, 11-9, 11-10, 11-11, 11-12, and 11-13 as promised in CPG/GANE'S Response to Applicants' First Set of Interrogatories and Request for Production of Documents.

Contention 12 (Cooling Tower Releases)

12-20. Do the Intervenor's contend that the salt deposition estimates provided by the Applicants in response to NRC Question E290.8 in Amendment 3 to the OL-ER, dated May 1984, and in the attachments to the September 25, 1984 letter from Mr. Foster of Georgia Power Company to Mr. Denton of the NRC are incorrect? If so, explain the manner in which you contend that the Applicants' estimates are erroneous.

12-21. For each type of "salt" identified in your response to Interrogatory 12-1, what deposition rate for that salt do the Intervenor's contend would cause harm to vegetation in the vicinity of Plant Vogtle?

12-22. What specific types of farm crops, pine trees, and hardwood trees are you referring to in your response to Interrogatory 12-6?

12-23. With respect to the statement in your response to Interrogatory 12-6 that all types of vegetation "could

be harmed" by salt deposition from the VEGP cooling towers, what physical properties or characteristics do you use the term "harm" to refer to?

12-24. For each type of farm crop, pine tree, or hardwood tree to which you are referring in response to Interrogatory 12-6, what level of salt deposition do Intervenor's contend would cause harm to what type of vegetation?

12-25. With respect to each of the chemical compounds that you identify in your response to Interrogatory 12-11 as resulting from the reactions that could occur when chlorine is injected into the cooling tower water at VEGP, state whether that compound constitutes free available chlorine (free residual chlorine), combined available chlorine (combined residual chlorine), or a chloride.

12-26. When chlorine is mixed with water in public water supply systems would the resulting chemical reactions differ in any way from the reactions identified by the Intervenor's in response to Interrogatory 12-11? If so, describe how those reactions would differ from the reactions listed in your response to Interrogatory 12-11 and explain the bases for those differences. . .

12-27. With respect to the hydrolysis reaction identified in your response to Interrogatory 12-12, what would be the rate of reaction and how complete would the

hydrolysis of the chlorine injected into the cooling tower water be, given the following parameters:

<u>pH</u>	7.0 to 8.0
<u>Temperature</u>	the Temperature of the water is 89 degrees F before going through the condenser and is 122 degrees F after going through the condenser.
<u>Concentration and Nature of Impurities in Cooling Tower Water at 4 Cycles of Concentration</u>	
	TDS (mg/l) 240
	TSS (mg/l) 50
	Calcium (mg/l) 30
	Sodium (mg/l) 30
	Magnesium (mg/l) 14
	Iron (mg/l) 1
	Potassium (mg/l) 8
	Copper (mg/l) less than 0.1
	Lead (mg/l) less than 0.1
	Zinc (mg/l) 0.1
	Mercury (mg/l) less than 0.01
	Chloride (mg/l) 20
	Fluoride (mg/l) 0.3
	Total Phosphorus (mg/l) 1
	Chromium (mg/l) less than 0.1
	Nitrate (mg/l) 1
	Alkalinity (as mg/l CaCO ₃) 95
	Sulfate (mg/l) 29
	Ammonia (mg/l) 0.85
	Bicarbonate (mg/l) 115
	Total Organic Carbon (mg/l as C) 18

12-28. Based upon (a) the parameters set forth in interrogatory 12-27, (b) the injection of approximately 420 lbs. of chlorine into the cooling tower water over two thirty-minute periods each day as described in the Applicants' response to the Intervenor's Interrogatory R-4, and

(c) the cooling tower parameters specified in the OL-ER in response to NRC question E290.8, what amount of each of the chemical compounds that you identify in your response to Interrogatory 12-11 as resulting from the reactions that could occur when chlorine is injected into the cooling tower water at VEGP would be present in the drift from the VEGP cooling towers?

12-29. With respect to the "chlorine" that the Intervenor contends would be emitted from the VEGP natural draft cooling towers, would that "chlorine" be in the form of a gas or dissolved in the drift?

12-30. Based upon (a) the parameters set forth in interrogatory 12-27, (b) the injection of approximately 420 lbs. of chlorine into the cooling tower water over two thirty minute periods each day as described in the Applicants' response to the Intervenor's Interrogatory R-4, and (c) the cooling tower parameters specified in the OL-ER in response to NRC question E290.8, what amount of "chlorine" do Intervenor estimate would be emitted from each cooling tower per day?

12-31. What percentage of the amount of "chlorine" that Intervenor estimate would be emitted from the VEGP cooling towers would reach the ground? Explain in detail the basis for your response and identify any documents that support that response.

12-32. What would be the environmental effect of the "chlorine" that Intervenors estimate would be released from the cooling towers? Explain in detail the basis for your response and identify any documents that support that response.

12-33. Provide a response to Interrogatory 12-7 as promised in CPG/GANE'S Response to Applicants' First Set of Interrogatories and Request for Production of Documents.

12-34. Supplement your responses to Interrogatories 12-3, 12-4, and 12-5 based upon the information provided by the documents produced by the Applicants, as promised in CPG/GANE'S Response to Applicants' First Set of Interrogatories and Request for Production of Documents.

Contention 14 (Diesel Generators)

14-9. Describe specifically each of the QA/QC problems in "materials" to which the Intervenors refer in their response to Interrogatory 14-7.

14-10. Describe specifically each of the QA/QC problems in "manufacturing" to which the Intervenors refer in their response to Interrogatory 14-7.

14-11. Describe specifically each of the QA/QC problems in "installation of TDI generators" to which the Intervenors refer in their response to Interrogatory 14-7.

14-12. Explain in detail the basis for the statement in your response to Interrogatory 14-7 that "all indications are that more problems will occur" with the TDI diesel generators at the VEGP.

14-13. Supplement your responses to Interrogatories 14-1, 14-2, 14-3, 14-4, 14-5, 14-6, and 14-7 based upon the information provided by the documents produced by the Applicants, as promised in CPG/GANE'S Response to Applicants' First Set of Interrogatories and Request for Production of Documents.

B. General Interrogatories

G-4. For each of the persons identified in your response to Interrogatory 2 of the NRC Staff's Interrogatories to Campaign for a Prosperous Georgia (CPG) and Georgians Against Nuclear Energy*(GANE) state the following:

(a) the specific contention or contentions about which he or she has knowledge;

(b) the subject matters relevant to this proceeding about which he or she has knowledge;

(c) the identity of each educational institution attended by that individual subsequent to high school, any degrees received from those institutions, and the date on which each such degree was awarded;

(d) a description of each job held by that individual since high school, including the identity and address of the employer, the job position and its duties, and the period of employment in that position;

(e) whether the Intervenors have utilized information from that person in developing the basis for any of the admitted contentions, and if so, which contentions; and

(f) whether the Intervenors have utilized information from that person in responding to any interrogatories or document requests from the Applicants or the NRC staff, and if so, which specific interrogatories or document requests.

G-5. For each interrogatory in Applicants' Third Set of Interrogatories and Request for Production of Documents list the name, title or position, address, and employer of each person who prepared or provided information used in preparing your response to that interrogatory.

G-6. For each interrogatory in Applicant's Third Set of Interrogatories and Request for Production of Documents list each document used or referred to by you in preparing your response to that interrogatory.

G-7. Identify each document requested by Applicants' Third Set of Interrogatories and Request for Production of Documents for which Intervenors claim a privilege against production. Include in the identification all addressees or recipients of the original or a copy of the document, a

brief description of its subject matter, and the nature of the privilege claimed.

III. REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that Intervenor respond in writing to the following request for production of documents and produce or make available for inspection and copying at a designated location each of the documents requested below that is in the possession, custody, or control of Intervenor. A document shall be deemed to be within the "control" of the Intervenor if Intervenor have ownership, possession or custody of the document or a copy thereof, or have the right to secure the document or copy from any person, organization, or public or private entity having physical possession thereof.

A. Specific Document Requests

Contention 7 (Groundwater)

7-1. All documents that refer to, relate to, or contain information about the sequence of hydrologic units beneath the Plant Vogtle site or the geologic formations that comprise or separate those units.

7-2. All documents that refer to, relate to, or contain information about the sequence of hydrologic units

beneath the Savannah River Plant site or the geologic formations that comprise or separate those units.

7-3. All documents that refer to, relate to, or contain information concerning the means by which contamination at the Savannah River Plant has reached the Cretaceous (Tuscaloosa) aquifer.

7-4. All documents that refer to, relate to, or contain information concerning the use of the water table aquifer beneath the VEGP as a source of drinking water, for agricultural supply, or by commercial establishments.

7-5. Each book, article, treatise, or other publication that is part of the "literature" to which the Intervenor refers in their response to Interrogatory 7-12.

7-6. All documents upon which you rely to support the contention that the hydrology and geology beneath the VEGP site is comparable to the hydrology and geology beneath the Savannah River Plant.

7-7. All documents that refer to, relate to, or contain information concerning the permeability of the marl underlying the VEGP site.

7-8. All documents that refer to, relate to, or contain information concerning the six wells at the Savannah River Plant that draw from the Cretaceous (Tuscaloosa) aquifer and that have been contaminated.

7-9. All documents upon which you base the statement in your response to Interrogatory 7-25 that the marl

underlying the VEGP site has "permeable sections and fragments. In fact, there are places where the clay does not even exist."

7-10. All documents that refer to, relate to, or contain any information concerning any fractures or permeable zones in the marl underlying the VEGP site or any places within the site boundaries where the marl does not exist.

7-11. Produce the following documents, which are referenced in the May 29, 1984 letter from William Lawless to Danny Feig:

- (a) Fenimore, J.W., The Assessment of Solid Low-Level Waste Management At The Savannah River Plant, Dupont Rep. No. DPST-77-300 (1977).
- (b) J. Wiley, "Savannah River Laboratory Dose to Man Model", Proceedings of the Third Annual Information Meeting, DOE Low Level Waste Management Program, November 4-6, 1981, New Orleans, LA, DOE Rep. ORNL/NFW-81/34, 305, (1981).
- (c) Radioactive Waste Management, DOE Order 5820.2 (1984).
- (d) Symposium on Low-Level Waste, NRC Rep. NUREG/CP-0028, CONF-820911 (1983).

7-12. Produce the following documents, which are referenced in the report prepared by William Lawless entitled "Savannah River Plant Offsite Releases Comparison" and dated June 7, 1984:

- (a) SR-90 In Turtle Carapace, DOE Savannah River internal memorandum, (1982).

- (b) Waste Management Operations, Savannah River Plant, a U.S. EROA Environmental Impact Statement Report EROA 1537 (1977).
- (c) Dukes, E.K., Benjamin, R.W., Savannah River Plant Airborne Emissions and Controls, Dupont Rep. DPST-82-1054 (1982).
- (d) "Issues Pertinent to the Long-Term Operation of the Burial Ground," letter from R. Maker, Dupont Program Manager, to J. B. Hindman, Director, DOE-SR Waste Management Project Office, June 30, 1981.
- (e) Fenimore, J.W., Radionuclides in 643 Groundwater-1973-1976, an internal Dupont Savannah River Laboratory Memorandum report to E.L. Albenesius, Nov. 23, 1977.
- (f) W. R. Jacobsen, Environmental Effects of a Tritium Gas Release From the Savannah River Plant on December 31, 1975, Dupont Savannah River Laboratory Rep. DP-1415 (1976).
- (g) W.L. Maiter, Environmental Effects of a Tritium Gas Release From The Savannah River Plant on May 2, 1974, Dupont Savannah River Laboratory Rep. DP--1369 (1974).
- (h) Environmental Monitoring In the Vicinity of the Savannah River Plant, Dupont Savannah River Plant Rep. DPSPU 83-30-1 (1983).
- (i) W.F. Lawless, Savannah River Plant (SRP) Burial Ground Building L43-G Management, Appraisal Report, Appraised June 2-13, 1980, Internal DOE draft report (1982).
- (j) J.F. Schubert, J.L. Heffter, G.A. Mead, Atlantic Coast Unique Regional Trace Experiment (ACURATE), Dupont Interim Rep. DP-1651 (1983).
- (k) W.L. Marter, New Criteria For Seepage Basin Use, Dupont Rep. DPST-77-444 (1977).
- (l) Radioactive Waste Management, AEC Regulation 0511 (1973).
- (m) S.H. Greemleigh, DOE Assistant General Counsel for Environment, "Compliance with EPA Hazardous Waste Regulations," A DOE review memorandum (November 17, 1980).

- (n) C. Ashley, C. Zeigler, Environmental Monitoring At the Savannah River Plant, Annual Report for 1981, Dupont Report DPSPU 82-302 (1984).
- (o) C.H. Ice, Dupont Director Savannah River Laboratory, Letter to N. Stetson, Manager, ERDA Savannah River Operations Office, "Comments on Technical Issues IN NRDC suit" p. 8 September 29, 1976.

7-13. Produce the following documents, which are referenced in the report prepared by William Lawless entitled "Savannah River Plant Offsite Radioactive Releases" and dated January 15, 1985:

- (a) W. F. Lawless, Department of Energy Radioactive Waste Management, a report submitted for publication, October 28, 1984.
- (b) Tritium in the Environment, National Council on Radiation Protection NCRP Report No. 2 (1979).
- (c) W. F. Lawless, The Dupont Management of Savannah River Plant Radioactive Wastes, a report to the U.S. House of Representatives Committee on Energy and Commerce, Subcommittee on Oversight and Investigations, November 27, 1984.

Contention 10.1 (Integrated Dose v. Dose Rate)

10.1-1. All documents not previously produced that refer to, relate to, or contain information concerning polymers that have been shown to be susceptible to differing dose rate effects (i.e. greater degradation at low dose rates than at a high dose rate during environmental qualification testing).

Contention 10.3 (Multiconductor Configurations)

10.3-1. All documents that refer to, relate to, or contain information concerning any EPR cable materials that performed substantially worse in a multiconductor configuration than in the corresponding single conductor configuration in environmental qualification tests.

Contention 10.5 (Solenoid Valves)

10.5-1. All documents that refer to, relate to, or contain information concerning the qualification testing of ASCO solenoid valves.

Contention 10.7 (Hydrogen Recombiners)

10.7-1. All documents that refer to, relate to, or contain any information concerning the qualification testing of the Westinghouse Model B Hydrogen Recombiners used at Plant Vogtle.

10.7-2. All documents that refer to, relate to, or in any way support your contention that the qualification testing of component parts of the Westinghouse Model B Hydrogen Recombiners used at VEGP does not suffice to qualify the hydrogen recombiner as a unit.

Contention 12 (Cooling Tower Releases)

12-1. All documents that refer to, relate to, or contain any information concerning vegetation in the vicinity of Plant Vogtle.

12-2. All documents that refer to, relate to, or contain any information concerning salt deposition from the VEGP cooling towers.

12-3. All documents that refer to, relate to, or contain any information concerning harm to vegetation caused by salt deposition from cooling towers.

12-4. All documents that refer to, relate to, or contain any information concerning the emission of "chlorine" from the VEGP cooling towers.

12-5. All documents that refer to, relate to, or contain any information concerning the environmental effect of any "chlorine" that the Intervenor contend would be released from the VEGP cooling towers.

Contention 14 (Diesel Generators)

14-1. If not previously produced, each document to which you refer in your response to Interrogatory 14-1.

14-2. All documents that refer to, relate to, or contain any information concerning the "QA/QC problems in materials, manufacturing and installation of TDI generators" to which you refer in your response to Interrogatory 14-7.

14-3. All documents that refer to, relate to, or contain any information concerning TDI diesel generators.

B. General Document Requests

G-4. Applicants request that Intervenor produce or make available for inspection and copying each and every document identified or described in the answer to any of the specific interrogatories above.

G-5. Applicants request that Intervenor produce or make available for inspection and copying each and every document that Intervenor used or referred to in preparing the response to any of the specific or general interrogatories above.

Respectfully submitted,

James E. Joiner
James E. Joiner, P.C.
Charles W. Whitney
Kevin C. Greene
Hugh M. Davenport
TROUTMAN, SANDERS, LOCKERMAN
& ASHMORE

George F. Trowbridge, P.C.
Ernest L. Blake, Jr., P.C.
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SHAW, PITTMAN, POTTS
& TROWBRIDGE

Counsel for Applicants

Dated: January 4, 1985

January 4, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board '85 -7 AIO:00

In the matter of: :
: :
GEORGIA POWER COMPANY, et al. : Docket Nos. 50-424
: 50-425
(Vogtle Electric Generating :
Plant, Units 1 and 2) :

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Second Set of Interrogatories and Request for Production of Documents," dated January 4, 1985; "Applicants' Third Set of Interrogatories and Requests for Production of Documents," dated January 4, 1985; "Notice of Appearance" of Charles W. Whitney, dated January 3, 1985; "Notice of Appearance" of Kevin C. Greene, dated January 3, 1985; and "Notice of Appearance" of Hugh M. Davenport, dated January 3, 1985, were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, or where indicated by an asterisk (*) by hand delivery, this 4th day of January, 1985.

James E. Joiner
James E. Joiner, P.C.

Dated: January 4, 1985

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of

GEORGIA POWER COMPANY, et al.

(Vogtle Electric Generating Plant,
Units 1 and 2)

)
)
) Docket No. 50-424
) 50-425
)

SERVICE LIST

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