

RELATED CORRESPONDENCEUNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARDDOCKETED
USNRC

'85 MAY -3 A11:24

In the Matter of:)

COMMONWEALTH EDISON COMPANY)

(Braidwood Nuclear Power
Station, Units 1 and 2))Docket Nos. 50-4560
50-457OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHBOB NEINER FARMS, INC., ET AL.
ANSWERS TO INTERROGATORIES REQUESTED BY NRC STAFFContention #4Interrogatory #1. Is the Intervenor aware of any evidence (other than exhibit A of the proposed revisions and amendments to their contention(s) which supports any of the following with respect to the Joliet Arsenal facility:

- a) plans to "reactivate," "enlarge," or "modernize,"
- b) plans to budget "between \$300,000,000 and \$420,000,000" for reactivation and enlargement, or
- c) plans for the production of a "new chemical-based explosive."

If the answer is yes, identify all such evidence (e.g. documents, reports, studies) and provide complete citations.

Answer #1. Intervenor via a telephone conversation with Mrs. Jean Duncan, a staff member in Congressman Edward Madigan's office, was told the following:

- A. House Report 981159 provided the funding for a feasibility study which has not yet been completed.
- B. \$32,000,000 was appropriated for a study of all facilities that are capable of producing RDX-HMX. \$10,000,000 of this \$32,000,000 has been allocated to a study of the Joliet Plant.

Interrogatory #2. Has the Intervenor obtained any evidence or performed analyses which establish a quantitative relationship between the contended reactivation and enlargement of the facility operations and the frequency of explosives shipments on the Illinois Central Railroad near the Braidwood site. If the answer is yes, identify the evidence (e.g., documents, studies) and provide complete citations.Answer #2. Not at this time.

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Interrogatory #3. Is the Intervenor aware of the technical bases and assumptions used by the Staff in determining the Braidwood, Unit 2 safety evaluation findings regarding the explosives shipments on the Illinois Central Railroad? If the answer is yes, identify relevant documents or reports and provide complete citations.

Answer #3. Not at this time.

Interrogatory #4. Part of Contention 4 alludes to the use of the Illinois Central Railroad for transport of explosive materials from "other plans or depositories." Has the Intervenor established the extent of the contribution of such shipments to the overall traffic of explosives on the Illinois Central Railroad? If the answer is yes, identify the evidence (documents, studies, reports, analyses) which support the Intervenor's estimates.

Answer #4. Not at this time.

Interrogatory #5. Has the Intervenor estimated the overpressures that may impact the Braidwood safety-related structures in the event of an explosives detonation on the Illinois Central Railroad? If the answer is yes, identify all relevant documents, studies, or analyses, and provide complete citations. Indicate the assumptions and the methodology used in making the estimates.

Answer #5. Not at this time.

Interrogatory #6. Has the Intervenor estimated the probability of an explosion of an explosives shipment on the Illinois Central Railroad near the Braidwood site? If the answer is yes, identify all relevant documents, studies, or analyses, and provide complete citations. Indicate the assumptions and the methodology used in making the estimates, including the traffic frequency.

Answer #6. Not at this time.

Interrogatory #7. Is the Intervenor aware of the maximum overpressures that the Braidwood, Unit 2 safety-related structures are designed to withstand? If the answer is yes, identify the relevant documents, studies, or reports which support your understanding of the capabilities of Braidwood, Unit 2 safety-related structures to withstand detonation overpressures.

Answer #7. Not at this time.

Interrogatory #8. Is the Intervenor aware of the nature and composition of the explosives that were being shipped from the Joliet Arsenal during the six-month period in 1974 referred to in Contention 4? If the answer is yes, identify all relevant documents and reports and provide complete citations.

Answer #8. Not at this time.

Interrogatory #9. With respect to the contention that "new chemical-based explosives" are being considered for production at the Joliet Arsenal, is the Intervenor aware of the specific nature of these explosives in terms of their blast characteristics? If the answer is yes, identify relevant documents and reports, and provide complete citations.

Answer #9. Not at this time.

Lorraine Creek and C. Allen Bock formulated the answers to these interrogatories.

I, C. Allen Bock, upon information and belief and being first duly sworn, submit the foregoing answers to the stated interrogatories.

Subscribed and sworn to before me
a Notary Public, this 30th day of
April, 1985.

Donald Louis Hentman

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For the Intervenor

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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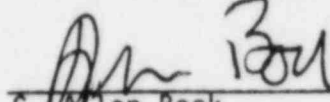
(Braidwood Nuclear Power
Station, Units 1 and 2))

Docket Nos. 50-456
50-457

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I, C. Allen Bock, attorney for Intervenor, certify that copies of the Answers to Interrogatories Requested by NRC Staff have been served in the above-captioned matter on those persons listed in the attached Service List by United States mail, postage prepaid, this 30th day of April, 1985.


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DATED: April 30, 1985

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