

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

In the Matter of: )

COMMONWEALTH EDISON COMPANY )

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

'85 MAY -3 A11 25

Docket Nos. 50-456

50-457

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

ANSWERS TO INTERROGATORIES REQUESTED BY APPLICANT  
COMMONWEALTH EDISON COMPANY BY INTERVENOR  
BOB NEINER FARMS, INC., ET AL.

Intervenor, Bob Neiner Farms, Inc., et al. hereby responds to the written interrogatories pursuant to 10 C.F.R. § 2.740b requested by Applicant.

Interrogatory #1. Identify the document(s) which or the person(s) whose opinion(s) provide(s) Intervenor's basis for the conclusion that 765 kV transmission lines create each of the following alleged conditions for persons who are within 600 feet of the line for six or more hours per day:

- a) audible noise impairing hearing;
- b) increasing tension;
- c) sleep interference;
- d) interference with the operation of cardiac pacemakers;
- e) biological effects on humans because of exposure to electric fields excluding the use of nearby areas for working, living, or recreation; and
- f) danger of shock to persons and animals.

Answer #1. a), b), c), d), e), f)

- "Potential Environmental Effects of 765-kV Transmission Lines: Views

Before the New York State Public Service Commission, cases 26529 and 26559, 1976-78," DOE/Ev0056, (Government Accession No.), U.S. Department of Energy, November 1979. Available from: National Technical Information Service, U.S. Department of Commerce, 5285 Port Royal Road, Springfield, VA 22161 (copy attached as Item A).

1303

-State of New York Public Service Commission Opinion No. 78-13, (case 26529 and 26559) (Opinion and order determining health and safety issues, imposing operating conditions, and authorizing, in case 26529, operation pursuant to those conditions). Issued June 19, 1978.

Also: State of New York Public Service Commission Opinion No. 76-12. Issued June 30, 1976. (copy attached as Item B).

-Project Resumes - "Biological Effects From Electric and Magnetic Fields Associated with High Voltage Transmission Lines,"

U.S. Department of Energy  
Division of Electric Energy Systems  
Washington, D.C. 20585

Electric Power Research Institute  
Health Studies Program  
Palo Alto, CA 94303

State of New York Department of Health  
New York State Power Lines Project  
Albany, NY 12201

-"Biological Effects of High Voltage AC Transmission Lines - Colstrip Project: Garrison-Spokane HVTL," A. R. Sheppard, Redlands, CA. February 1983. Prepared for Montana Department of Natural Resources and Conservation.

-"Agreement Between New York State Public Service Commission and Power Authority of State of New York Concerning Operation of Massena-Marcy 765kV Transmission Line." (attached as Item C).

-New York State Department of Health Center for Laboratories and Research, Albany, New York 12201 - Memorandum, April 5, 1984. (attached as Item D).

-The New York State Power Lines Project Notice of Public Meetings and Report on the Status of the Projects. (attached as Item E).

Interrogatory #2. State with particularity the basis for the assumption that 765kV transmission lines will be constructed within 600 feet of where persons would have occasion to be for six or more hours per day. If persons exist who would have occasion to be within 600 feet of such lines for six or more hours per day, identify each such person by name and address.

Answer #2. Intervenor believes that testimony before the Illinois Commerce Commission by Applicant indicated that there had been acquisition of transmission right of way for the 765kV transmission line by Applicant.

Recorder's Office of Kankakee County, Illinois, showing right of way easement acquisitions by Applicant.

Pat Neiner  
Pat Michael Neiner  
Bob Anthony Neiner  
R. R. #1, Box 139  
Manteno, IL 60950

Bob E. Neiner  
Eleanor M. Neiner  
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Manteno, IL 60950

Interrogatory #3. State whether Intervenor agrees that the fields associated with parallel 345kV and 765kV lines would be, at worst, only slightly higher than an average of 2.4 kV/m (maximum 6.9 kV/m) for lines at a height of 1 m. (See Braidwood Final Environmental Statement (FES) at § 5.5.1.2 and Braidwood Environmental Report-Operating License Stage (ER-OLS) at § 3.9.6). If Intervenor disagrees with this conclusion, state with particularity the basis for such disagreement, and identify all documents or persons upon which Intervenor relies in assessing the accuracy of this conclusion.

Answer #3. Intervenor disagrees with this conclusion because the conclusion is based on construction plans which the Intervenor believes are not final and, in addition, the conclusion is dependent on the configuration of the lines and the size of the wire bundles. Also see the New York Hearing Report earlier cited.

Interrogatory #4. State whether Intervenor agrees with the NRC Staff's conclusion in the FES at § 5.5.1.2 that "[f]or the most part, adverse effects have been demonstrated only for higher fields (e.g., greater than 15 kV/m) or longer exposure times than would occur for people residing near or working under transmission lines." If Intervenor disagrees with this conclusion, state with particularity the basis for such disagreement, and identify all documents or persons upon which Intervenor relies in assessing the accuracy of this conclusion.

Answer #4. Intervenor does not agree and as a basis for that disagreement refers to the New York Hearing Report earlier cited.

Interrogatory #5. In light of the NRC Staff's analysis of and conclusions regarding the environmental impacts of postulated accidents described in § 5.9.4 of the FES, state with particularity the basis for Intervenor's conclusion in Contention 7 that "the potential that these facilities would have to be closed, either temporarily or permanently, due to the release of substantial quantities of radioactive materials during an accident creates an unacceptable environmental impact."

Interrogatory #6. Identify the document(s) which or the person(s) whose opinion(s) provide(s) the basis for Intervenor's conclusion in Contention 7 that "the potential that these facilities would have to be closed, either temporarily or permanently, due to the release of substantial quantities of radioactive materials during an accident creates an unacceptable environmental impact."

Interrogatory #7. Identify the levels of radioactive release which Intervenor contends would be of "substantial quantities" so as to require that the recreational facilities referenced in Contention 7 would have to be closed, temporarily or permanently.

Interrogatory #8. Identify the type of radiation release at issue in Contention 7.

Interrogatory #9. Identify the type of accident postulated in Contention 7, e.g., postulated design-basis accident or a Class 9 accident.

Answer #5, 6, 7, 8, 9. Intervenor has requested permission to withdraw the contentions for which these interrogatories relate.

Interrogatory #10. Identify by name, title or position, and address all persons Intervenor intends to present as witnesses to testify with regard to Contentions 1 and 7.

Answer #10. Dr. Alwyn Scott, Professor, Department of Electrical and Computer Engineering, ~~University of Arizona, Tucson, Arizona.~~ (Dr. Scott is presently hospitalized with serious injuries and Intervenor may have to substitute another witness at a later time.) Dr. Ralph Armington, Professor, Illinois Institute of Technology, 3300 S. Federal, Chicago, IL 60616.

Interrogatory #11. Identify the principal spokesperson(s) for Bob Neiner Farms and each individual who formulated or helped to formulate the answers to these interrogatories.

Answer #11. Lorraine Creek  
R. R. #1, Box 182  
Manteno, IL 60950

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. Copies of the reference documents were sent only to Applicant and NRC Staff.

Subscribed and sworn to before  
me, a Notary Public, this 29th  
day of April, 1985

Donald Louis Uchtmann

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C. Allen Bock  
For the Intervenor

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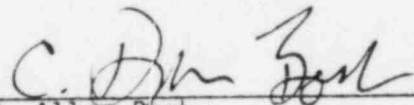
Docket Nos. 50-456  
50-457

'85 MAY -3 A11:25

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CERTIFICATE OF SERVICE

I, C. Allen Bock, attorney for Intervenor, certify that copies of the Answers to Interrogatories 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.

  
C. Allen Bock

C. Allen Bock  
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DATED: April 30, 1985

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