

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

POWER AUTHORITY OF THE STATE OF
NEW YORK

(Greene County Nuclear Power Plant)

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Docket No. 50-549

NRC STAFF INTERROGATORIES TO THE
COLUMBIA COUNTY SURVIVAL COMMITTEE AND ARTHUR L. REUTER

Pursuant to 10 CFR § 2.740 of the Commission's Rules of Practice, the NRC Staff hereby requests that the Columbia County Survival Committee and Arthur L. Reuter, (Intervenors) answer separately and fully in writing under oath or affirmation the interrogatories set forth below.

Insofar as any answer is based on information other than the personal knowledge of the individual subscribing to the answers, the source of such information shall be disclosed. When the source of the information is another individual, such disclosure is to be in the form of the individual's name, address, and relationship with the Intervenors, if any. Where the source of information is a writing of some kind, it shall be identified.

The interrogatories set forth below are to be considered the Intervenors' continuing obligation. Accordingly, if, after the Intervenors have answered these interrogatories, additional information comes to their attention with respect to one or more of the answers, the answers should be amended to provide such additional information.

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Columbia County Survival Committee and Arthur L. Reuter Contention 5 b.^{*/}

5. Petitioner contends that the site of the proposed Greene County Nuclear Power Plant is unsuitable for the following reasons...

b. The effect on the proposed facility from blasting operations continually conducted close to the site by local industries has not been adequately considered. These blasting operations are likely to damage the delicate mechanisms of the proposed facility causing safety problems or shutdowns.

1-1 a. Upon what person or persons do you rely to substantiate your case on the above contention?

b. Provide the addresses and educational and professional qualifications of any person named in your response to a. above.

c. Identify which of the above persons you intend to call as witnesses on this contention in this proceeding.

d. Identify which of those persons identified in c. above you anticipate will appear voluntarily and which under subpoena.

e. Identify each document upon which this contention is based.

^{*/} The wording of this contention conforms to the wording accepted by the Atomic Safety and Licensing Board in its Memorandum and Order dated February 14, 1977, at 11.

- 1-2 a. Indicate the deficiencies in the Staff's evaluation of the effects on the proposed facility from blasting operations conducted close to the site by local industries. Indicate any data, sources of data, assumptions, reasons for the assumptions used in performing any calculations.^{*/}
- b. Identify the "delicate mechanisms of the proposed facility" that may be damaged by the blasting operations noted in a. above.
- c. Indicate how the blasting operations noted in a. above may damage each of the "delicate mechanisms of the proposed facility" noted in b. above. Indicate any data, sources of data, assumptions, reasons for assumptions used in performing any calculations.^{*/}
- 1-3 To the extent that Intervenor's case on this contention will rely on cross-examination of witnesses presented by other parties to this proceeding, identify any material to be relied upon during such cross-examination.
- 1-4 Identify all documentary or other material which you intend to offer as exhibits on this contention in this proceeding.

Columbia County Survival Committee and Arthur L. Reuter Contention 8.^{**/}

8. Petitioner contends that the Applicant's PSAR has not adequately considered the susceptibility of the site to earthquakes.

Three cement companies have been removing weight from the earth's crust at Cementon for more than a decade. It is submitted that a

^{*/} We desire this information in sufficient detail to allow replication of the results of your calculations.

^{**/} The wording of this contention conforms to the wording accepted by the Atomic Safety and Licensing Board in its Memorandum and Order dated February 14, 1977, at 13.

study should be made to determine whether this removal of stone and sand increases the possibility of earthquakes at Cementon or would tend to magnify the result of an earthquake otherwise caused.

2-1 a. Upon what person or persons do you rely to substantiate your case on the above contention?

b. Provide the addresses and educational and professional qualifications of any person named in your response to a. above.

c. Identify which of the above persons you intend to call as witnesses on this contention in this proceeding.

d. Identify which of those persons identified in c. above you anticipate will appear voluntarily and which under subpoena.

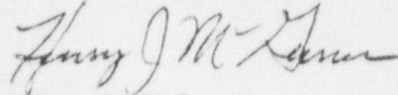
e. Identify each document upon which this contention is based.

2-2 Indicate the bases, calculations and documents (including trench logs, maps, well data and published works) that you intend to rely on during this proceeding to support your contention that removal of stone and sand at Cementon for more than a decade increases the possibility of earthquakes at Cementon or would tend to magnify the results of an earthquake otherwise caused.

2-3 To the extent that Intervenor's case on this contention will rely on cross-examination of witnesses presented by other parties to this proceeding, identify any material to be relied upon during such cross-examination.

2-4 Identify all documentary or other material which you intend to offer as exhibits on this contention in this proceeding.

Respectfully submitted,



Henry J. McGurren
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 2nd day of October, 1978