

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	)	Docket No. 50-549
(Greene County Nuclear Power Plant)	)	

NRC STAFF INTERROGATORIES TO, AND REQUEST FOR  
THE PRODUCTION OF DOCUMENTS FROM,  
CEMENTON CIVIC ASSOCIATION

The Nuclear Regulatory Commission (NRC) Staff hereby requests that Cementon Civic Association (Intervenor), pursuant to 10 CFR §2.740b, answer separately and fully, in writing under oath or affirmation, the following interrogatories within 14 days after service hereof in accordance with the Atomic Safety and Licensing Board's Order of August 1, 1978.

For each response to the interrogatories listed below identify the person or persons who prepared, or substantially contributed to the preparation of the response, the address of the individual and the individual's relationship with the Intervenor, if any.

The interrogatories attached are to be considered the Intervenor's continuing obligation. Accordingly, if, after the Intervenor has answered these interrogatories, additional information comes to its attention with respect to one or more of the answers, the answers should be amended in a timely manner to provide such additional information.

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The NRC Staff further requests that the Intervenor, pursuant to 10 CFR §2.741, provide copies of, or make available for Staff inspection and copying, the documents designated by the Intervenor in response to certain of the accompanying interrogatories.

A. General Interrogatories<sup>1/</sup>

G-1 State whether or not you intend to call any person or persons as witnesses in the NRC proceeding in support of

- (a) Contention I.A.1
- (b) Contention I.A.2
- (c) Contention I.A.3
- (d) Contention I.B

and provide the names, addresses, educational backgrounds and professional qualifications of those persons you intend to call.

G-2 Indicate whether those persons identified in response to interrogatory G-1 in support of

- (a) Contention I.A.1
- (b) Contention I.A.2
- (c) Contention I.A.3
- (d) Contention I.B

will appear voluntarily or under subpoena.

G-3 Provide summaries of the views, positions or proposed testimony on

- (a) Contention I.A.1
- (b) Contention I.A.2
- (c) Contention I.A.3
- (d) Contention I.B.

of all persons named in response to interrogatory G-1 that you intend to present during this proceeding.

G-4 Identify by author, title, date of publication and publishers, all books, documents and papers that you intend to employ or rely upon in presenting your direct case on

- (a) Contention I.A.1
- (b) Contention I.A.2

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<sup>1/</sup> Interrogatories in this section should be answered with respect to each contention specified in the interrogatories. The designation of contentions corresponds to that set forth in the Atomic Safety and Licensing Board's Memorandum and Order of February 14, 1977.

(c) Contention I.A.3

(d) Contention I.B.

and provide copies of, or make available for Staff inspection and copying, these items.

G-5 If the representations made in

(a) Contention I.A.1

(b) Contention I.A.2

(c) Contention I.A.3

(d) Contention I.B

are based in whole or in part on any documents prepared by the Applicant or the NRC Staff which you contend are deficient, specify which documents, and the particular portions thereof, you regard as deficient, and explain specifically and in detail why they are deficient, citing any documents, studies or reports which form the basis for your assertions.

G-6 Identify by author, title, date of publication and publisher, all books documents or papers that you intend to employ or rely upon in conducting your cross-examination of prospective NRC Staff witnesses testifying in connection with

(a) Contention I.A.1

(b) Contention I.A.2

(c) Contention I.A.3

(d) Contention I.B

B. Interrogatories Related To Contentions I.A.1, I.A.2, I.A.3 -  
Financial Qualifications

Contention I.A.1

I.A.1-1 Specifically define what is meant by the phrase "long-term capital markets" as that phrase is used in Contention I.A.1.

I.A.1-2 State specifically the bases for the assertion in Contention I.A.1 that "the long-term capital markets appear to be closed



or extremely limited to borrowings by the State of New York" and identify any documents, studies or reports upon which you rely as the basis for this assertion.

- I.A.1-3 State specifically the bases for the assertion implied in Contention I.A.1 that the long-term capital markets are closed or extremely limited with regard to borrowings by the Applicant itself and identify any documents, studies or reports upon which you rely as the basis for this assertion.

Contention I.A.2

- I.A.2-1 State specifically the bases for the assertion in Contention I.A.2 that decreased demand for electricity in 1974 and 1975 will render the Applicant unable to market power from the proposed Greene County Nuclear Power Plant, if and when it is licensed to operate, and thereby curtail necessary revenue. Identify any documents, studies or reports upon which you rely as the basis for this assertion.

- I.A.2-2 What is meant by the "necessary revenue" referred to in Contention I.A.2?

Contention I.A.3

- I.A.3-1 Define the specific
- (a) "increased cost of nuclear fuel"
  - (b) "high capital cost of nuclear facilities" and
  - (c) "crushing economic burden of excess reserves"
- referred to in Contention I.A.3 and state specifically the basis for your assertion that the costs thus identified will make electricity generated by the Greene County facility non-competitive thereby affecting the Applicant's financial qualifications to engage in the proposed activities in accordance with the Commission's regulations.

I.A.3-2 What is your understanding of the meaning of the phrase "financially qualified to engage in the proposed activities in accordance with the regulations" as that phrase is used in 10 CFR §50.40 with regard to the construction permit stage of the licensing process for nuclear plants?

C. Interrogatories Related to Contention I.B - Emergency Procedures

I.B-1 Specifically define what is meant by the phrase "reasonable probability" as that phrase is defined in Contention I.B.

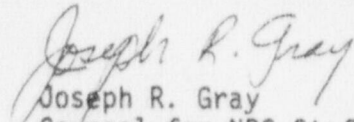
I.B-2 Specifically define what is meant by the phrase "appropriate measures" as that phrase is used in Contention I.B.

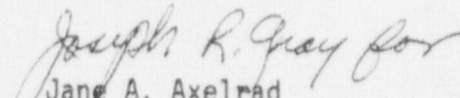
I.B-3 State whether it is your assertion that Highway 9W is inadequate to evacuate the Community of Cementon in the event of an emergency at the proposed facility? If the answer to the above question is yes, state the basis for your assertion and identify any documents, studies, or reports upon which you rely as the basis for this assertion.

I.B-4 Assume that the location of existing Highway 9W were changed as proposed by the Applicant in its Environmental Impact Assessment, Access Improvements - Cementon Site, Greene County Nuclear Power Plant, prepared by Parsons Brinckerhoff Quade and Douglas, Inc., August, 1977. For each option proposed by the Applicant in that study state whether you would still assert that Highway 9W is

inadequate to evacuate the Citizens of Cementon in the event of an emergency at the proposed facility.

Respectfully submitted,

  
Joseph R. Gray  
Counsel for NRC Staff

  
Jane A. Axelrad  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 29th day of September, 1978