

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, AND REQUEST FOR  
THE PRODUCTION OF DOCUMENTS FROM,  
ARTHUR L. REUTER AND THE COLUMBIA COUNTY SURVIVAL COMMITTEE

The Nuclear Regulatory Commission (NRC) Staff hereby requests that Arthur L. Reuter and the Columbia County Survival Committee (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) Stipulated Contention 5a
  - (b) Stipulated Contention 9
  - (c) Unstipulated Contention B.6
- 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) Stipulated Contention 5a
  - (b) Stipulated Contention 9
  - (c) Unstipulated Contention B.6
- will appear voluntarily or under subpoena.
- G-3 Provide summaries of the views, positions or proposed testimony on
- (a) Stipulated Contention 5a
  - (b) Stipulated Contention 9
  - (c) Unstipulated Contention B.6
- 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 publisher, all books, documents and papers that you intend to employ or rely upon in presenting your direct case on
- (a) Stipulated Contention 5a
  - (b) Stipulated Contention 9
  - (c) Unstipulated Contention B.6
- and provide copies of, or make available for Staff inspection and copying, these items.

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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.



G-5 If the representations made in

- (a) Stipulated Contention 5a
- (b) Stipulated Contention 9
- (c) Unstipulated Contention B.6

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) Stipulated Contention 5a
- (b) Stipulated Contention 9
- (c) Unstipulated Contention B.6.

B. Interrogatories Related to Stipulated Contention 5a -  
Exposure of Site to Air Traffic

S5a-1 State specifically the bases for the assertion in Stipulated Contention 5a that the proposed site is lying in an air corridor for international air travel. Include in your response a listing of: the airports which you contend provide the source of, or destination points for, aircraft whose flight patterns are in the air corridor passing over the proposed site; the weight and flight frequency of aircraft whose flight patterns are in the air corridor passing over the proposed site; and the nearest approach of such flights to any corridor passing directly over the proposed site.

S5a-2 Westover AFP was closed several years ago and the Air National Guard Unit responsible for the property has no

record of any of its flights passing near the site. The Department of Defense Flight Information Publication Ap-1B shows no military training routes within about 100 miles of the site. Do you have any information which would contradict these military sources. If so, state what that information is.

S5a-3 State specifically the bases for the assertion in Stipulated Contention 5a that the proposed site "is in the flight pattern for practice runs from Westover (Mass.) Airforce Base". Include in your response a listing of: the weight and flight frequency of aircraft whose flight patterns are in the vicinity of the proposed site; and the nearest approach of such flights to any corridor passing directly over the proposed site.

S5a-4 State specifically the basis for the assertion that the commercial and military flights referred to in Stipulated Contention 5a pose a "particular hazard" to the proposed site. Include in your answer any analysis on which you rely showing the probability that an aircraft will strike the proposed site, if such analysis exists.

S5a-5 What separation distance do you assert is required between a site and a commercial or military airway or air corridor in order to assure adequate safety? State specifically the basis for your answer.

C. Interrogatories Related to Stipulated Contention 9 -  
Accidental Radiological Releases

S9-1 Identify specifically the accidents which will result in the radiological releases referred to in Stipulated Contention 9.

S9-2 State specifically the bases for your assertion in Stipulated Contention 9 that accidental radiological releases from the proposed facility may result in damage to the water supplies



referred to in the contention. In addition to any other information you rely upon as the bases for Stipulated Contention 9, your response should include:

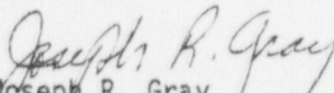
- (a) Meteorological data used in your analysis including:
  - (1) Method by which data was acquired.
  - (2) Meteorological model used to analyze the data.
- (b) Types of radiological accidents evaluated including:
  - (1) Source term used in your analysis and basis for the source term used.
  - (2) Dose Conversion Factors for the various organ doses evaluated and source of numerical values used.
  - (3) Breathing rates for doses due to inhalation.
- (c) Assumptions used in modeling release and transport of fission products from plant site.
- (d) Assumptions used in modeling deposition onto and mixing within the body of water analyzed.
- (e) Qualifications of personnel involved with the model design, derivation of equations used in model, codification of model, debugging of computer models and evaluation of computer results.
- (f) Justification for any assumptions used in your analysis.

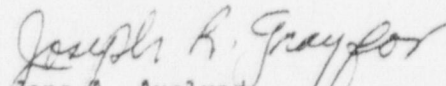
D. Interrogatories Related to Contention B-6 - Emergency Procedures

- B-6-1 State specifically what is meant by the phrase "surrounding populations" as that phrase is used in Contention B-6.
- B-6-2 State specifically what is meant by the phrase "sufficient information" as that phrase is used in Contention B-6.

B-6-3 State with specificity what requirements of 10 CFR Part 50, Appendix E, have not been met by the Applicant's description of emergency plans.

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



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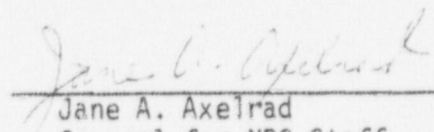
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Docket No. 50-549

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance in the captioned matter. In accordance with §2.713(a), 10 CFR Part 2, the following information is provided:

Name	- Jan. A. Axelrad
Address	- U. S. Nuclear Regulatory Commission Washington, D. C. 20555
Telephone Number	- 301-492-7437
Admission	- District of Columbia Court of Appeals
Name of Party	- NRC Staff U. S. Nuclear Regulatory Commission Washington, D. C. 20555

  
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Jane A. Axelrad  
Counsel for NRC Staff

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