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December 6, 1978



Stephen H. Lewis, Esq.
Office of the Executive Legal Director
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Re: Greene County Nuclear Power Plant
NRC Docket No. 50-549 and PSC Case 80006

Dear Mr. Lewis:

Enclosed herewith are the answers to NRC Staff Interrogatories H1 through H11. These interrogatories, which were addressed to the Managing Board of Heidelberger Zement, have been answered by Mr. Theodor Brenke, a member of the Managing Board. If there is any further information which Staff desires in connection with these proceedings, do not hesitate to contact me.

Very truly yours,

DeGRAFF, FOY, CONWAY & HOLT-HARRIS

Algird F. White, Jr.
Algird F. White, Jr.

AFW:kar
Enclosures
cc: All parties
w/enclosures

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GREENE COUNTY NUCLEAR POWER PLANT

APPLICATION TO THE NEW YORK STATE BOARD
ON ELECTRIC GENERATION SITING AND THE ENVIRONMENT
FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY

INTERROGATORY NO. H1

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

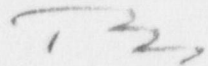
DATED: September 22, 1978

INTERROGATORY:

Has the Heidelberg management board given any consideration either in formal or informal proceedings to the loss of its facilities at Cementon as a result of the construction of the Greene County Nuclear Plant (GCNP) at the Cementon site?

RESPONSE:

Since the acquisition of Lehigh approximately one year ago, the Heidelberg management board feels considerably restricted with respect to its engineering and planning efforts concerning the cement plant in Cementon. If the Greene County nuclear power plant is constructed, Heidelberg cannot utilize the existing possibilities to improve the Alsen performance.



Theodor Brenke

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INTERROGATORY NO. H2

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF


DATED: September 22, 1978

INTERROGATORY:

In the event that the GCNP is built on Lehigh property at Cementon, has the Heidelberg management board determined either formally or informally that its production facilities at Cementon must be closed permanently?

RESPONSE:

The Heidelberg management board has concluded that in the event that the GCNP is built on Lehigh property at Cementon that the existing production facilities will probably be forced to close prematurely as a result of interruptions during the construction phases and problems in operating efficiently post construction and because Lehigh will not be able to construct the type of new cement production facility which will enable Lehigh to be a dominant factor in the Northeast market in the long term.



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INTERROGATORY NO. H3

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF


DATED: September 22, 1978

INTERROGATORY:

In the event that the GCNP is built on the Lehigh property, and that such a development causes the closing of the facility, has the Heidelberg management board given consideration either formally or informally to what alternatives the company should take in response to this closing of its facilities?

RESPONSE:

The Heidelberg management board has given intensive consideration to what alternatives the company should take in the event the GCNP is built on Lehigh property, causing the closing of the Lehigh plant.



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INTERROGATORY NO. H4

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

DATED: September 22, 1978

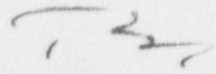
INTERROGATORY:

In the event of such a loss of the Cementon facilities, has the Heidelberg management board either formally or informally determined that it is not feasible to construct an entirely new facility at a virgin or "greenfield" site?

RESPONSE:

The Heidelberg management board has determined that it is not feasible to construct an entirely new facility at a virgin or "greenfield" site in the Northeast because:

1. According to our information, there are no suitable raw material deposits in the Northeast with sufficient reserves, suitable locations to the market and acceptable highway and railroad network as well as direct access to navigable waters.
2. We foresee enormous difficulties in acquiring property which is not owned by Lehigh for the purpose of building a new cement plant.
3. It is considerably more expensive to erect a new cement production facility in the Northeast at a virgin or "greenfield" site, than to build a new cement plant which is located directly at the Hudson River in Alsen on Lehigh property and in the immediate vicinity of the existing quarries.



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INTERROGATORY NO. H5

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

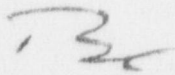
DATED: September 22, 1978

INTERROGATORY:

Has the Heidelberg management board initiated or caused to be initiated in any way a search for a virgin or "greenfield" site? If so, in what governmental jurisdiction is the site located?

RESPONSE:

The Heidelberg management board has not initiated or caused to be initiated a search for a virgin or "greenfield" site in the Northeast region.



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INTERROGATORY NO. H6

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

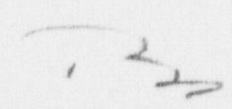
DATED: September 22, 1978

INTERROGATORY:

In the event of a loss of the Cementon facilities, has the Heidelberg management board either formally or informally discussed the feasibility of purchasing the existing (operating or non-operating) facilities of another cement manufacturer?

RESPONSE:

The Heidelberg management board has discussed many possibilities for an alternate solution in the event of a loss of the Cementon facilities. These possibilities include the purchase of an existing facility of another cement manufacturer with good raw materials, production costs, and market conditions.



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INTERROGATORY NO. H7

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

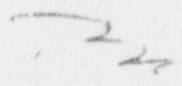
DATED: September 22, 1978

INTERROGATORY:

If such discussions have occurred, what candidates for such purchase have been identified, and where are they located?

RESPONSE:

We have - without officially involving the Lehigh Board of Directors - evaluated several offers from the U. S. market. In each case, the high capital requirements mentioned by the potential sellers for plants not meeting Heidelberg's high standards have convinced us to discontinue further negotiations.



Theodor Brenke

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INTERROGATORY NO. H8

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

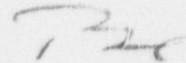
DATED: September 22, 1978

INTERROGATORY:

In the event of a loss of the Cementon facilities, has the Heidelberg management board either formally or informally discussed the feasibility of purchasing the adjoining properties of the Alpha and/or Marquette companies?

RESPONSE:

The Heidelberg management board has discussed among others the feasibility of purchasing the adjoining properties of the Alpha and/or Marquette Companies.



Theodor Brenke

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INTERROGATORY NO. H9

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

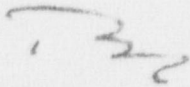
DATED: September 22, 1978

INTERROGATORY:

In the event of such discussions, has the Heidelberg board initiated or caused to be initiated any analysis of the feasibility of a purchase of either the adjoining Alpha or Marquette properties?

RESPONSE:

The Heidelberg management board has not initiated or caused to be initiated any analysis of the feasibility of a purchase of either the adjoining Alpha or Marquette properties, because neither raw material deposit meets Heidelberg's needs in terms of quarry reserves, nor is there any chance for converting the existing plants into modern low cost cement production facilities, nor is there any site available for the construction of such a facility on deep water.



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INTERROGATORY NO. H10

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

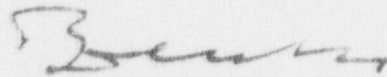
DATED: September 22, 1978

INTERROGATORY:

Has the Heidelberg management board initiated or caused to be initiated any direct or indirect, formal or informal contacts with Alpha or Marquette officials regarding a potential Lehigh purchase of either of the companies' adjoining properties?

RESPONSE:

The Heidelberg management board has not initiated or caused to be initiated any direct or indirect formal or informal contacts with Alpha or Marquette officials regarding a potential Lehigh purchase of either of the companies' adjoining properties.



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INTERROGATORY NO. H11

REQUESTED BY: NUCLEAR REGULATORY COMMISSION STAFF

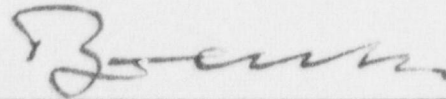
DATED: September 22, 1978

INTERROGATORY:

In the event of the above described loss of Lehigh's production facilities at Cementon, has the Heidelberg management board formally or informally determined that a purchase of the adjoining properties of Alpha and/or Marquette is not feasible? On what basis was such infeasibility established for each company's property?

RESPONSE:

The Heidelberg management board has determined that a purchase of the adjoining properties of Alpha and/or Marquette is not feasible. Such a determination was made on the basis of the considerations outlined in the answer to Interrogatory H9.



Theodor Brenke