

8/13/81

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
LOUISIANA POWER AND LIGHT COMPANY)	Docket No. 50-382
(Waterford Steam Electric Station,)	
Unit 3))	

NRC STAFF'S THIRD SET OF INTERROGATORIES TO, AND
REQUEST FOR DOCUMENTS FROM, LOUISIANA CONSUMERS LEAGUE, INC.

The NRC Staff ("Staff") hereby requests that Louisiana Consumer's League, Inc. ("LCL"), pursuant to 10 CFR §§ 2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce or make available for inspection and copying, all documentary material identified in the responses to interrogatories below. As provided in paragraph 3 of the "Stipulation on Discovery Schedule" ("Stipulation)", forwarded to the Atomic Safety and Licensing Board ("Licensing Board") on September 25, 1979, these interrogatories relate to new information contained in the Staff's Safety Evaluation Report (SER) relevant to allowed contentions. Pursuant to paragraph 5 of the Stipulation, these interrogatories must be answered within 30 days, and any objections to the interrogatories must be served within 15 days.

All references provided in response to these interrogatories are to be identified by author, title, date of publication and publisher if the reference is published; if any such reference is not published, it is to be identified

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by author, title, date it was written, the qualifications of the author relevant to this proceeding, and the location where a copy of the document may be obtained.

All persons named in response to these interrogatories are to be identified by name, address, employer, position, education, professional qualifications, and publications related to their views concerning the subject matter of this proceeding.

INTERROGATORIES ON CONTENTION 2

2-1. State whether LCL contends that the Staff's SER (§§ 2.2, 7.2.5, 8.2, 8.3) fails to adequately resolve the issue(s) raised by LCL in Contention 2.

2-2. If the answer to Interrogatory 2-1 is affirmative, state in detail the reasons and basis for LCL's contention.

2-3. If the answer to Interrogatory 2-1 is affirmative, identify all persons upon whom LCL relies in support of this contention along with a summary of their views or positions relevant to the subject matter of your contention.

2-4. If the answer to Interrogatory 2-1 is affirmative, identify all persons whom LCL intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

2-5. If the answer to Interrogatory 2-1 is affirmative, identify all documentary or other material that LCL intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

INTERROGATORIES ON CONTENTION 3

3-1. State whether LCL contends that the Staff's SER (§§ 2.1, 2.2) fails to adequately resolve the issue(s) raised by Contention 3.

3-2. If the answer to Interrogatory 3-1 is affirmative, state in detail the reasons and basis for LCL's contention.

3-3. If the answer to Interrogatory 3-1 is affirmative, identify all persons upon whom LCL relies in support of this contention, along with a summary of their views or positions relevant to the subject matter of this contention.

3-4. If the answer to Interrogatory 3-1 is affirmative, identify all persons whom LCL intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

3-5. If the answer to Interrogatory 3-1 is affirmative, identify all documentary or other material that LCL intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

INTERROGATORIES ON CONTENTION 4

4-1. State whether LCL contends that the Staff's SER (§ 13.3) fails to adequately resolve the issue(s) raised by Contention 4.

4-2. If the answer to Interrogatory 4-1 is affirmative, state in detail the reasons and basis for LCL's contention.

4-3. If the answer to Interrogatory 4-1 is affirmative, identify all persons upon whom LCL relies in support of this contention, along with a summary of their views or positions relevant to the subject matter of this contention.

4-4. If the answer to Interrogatory 4-1 is affirmative, identify all persons whom LCL intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

4-5. If the answer to Interrogatory 4-1 is affirmative, identify all documentary or other material that LCL intends to use in this proceeding to support this contention and that you intend to offer as exhibits on

this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

INTERROGATORIES ON CONTENTION 6

6-1. State whether LCL contends that the Staff's SER (§§ 15.2, 15.3) fails to adequately resolve the issue(s) raised by Contention 6.

6-2. If the answer to Interrogatory 6-1 is affirmative, state in detail the reasons and basis for LCL's contention.

6-3. If the answer to Interrogatory 6-1 is affirmative, identify all persons upon whom LCL relies in support of this contention, along with a summary of their views or positions relevant to the subject matter of this contention.

6-4. If the answer to Interrogatory 6-1 is affirmative, identify all persons whom LCL intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

6-5. If the answer to Interrogatory 6-1 is affirmative, identify all documentary or other material that LCL intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

INTERROGATORIES ON AMENDED CONTENTION 1^{*/}

1A-1. State whether LCL contends that the Staff's SER (§ 17.1-6, 22.2) fails to adequately resolve the issue(s) raised by Amended Contention 1.

1A-2. If the answer to Interrogatory 1A-1 is affirmative, state in detail the reasons and basis for LCL's contention.

1A-3. If the answer to Interrogatory 1A-1 is affirmative, identify all persons upon whom LCL relies in support of this contention, along with a summary of their views or positions relevant to the subject matter of this contention.

1A-4. If the answer to Interrogatory 1A-1 is affirmative, identify all persons whom LCL intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

1A-5. If the answer to Interrogatory 1A-1 is affirmative, identify all documentary or other material that LCL intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

^{*/} All references herein to any "Amended Contention" relates to the "Amended Contentions of the Louisiana Consumer's League, Inc.," filed on December 10, 1979.

INTERROGATORIES ON AMENDED CONTENTION 2

2A-1. State whether LCL contends that the Staff's SER (§§ 15.2, 15.3, 22.2) fails to adequately resolve the issue(s) raised by Amended Contention 2.

2A-2. If the answer to Interrogatory 2A-1 is affirmative, state in detail the reasons and basis for LCL's contention.

2A-3. If the answer to Interrogatory 2A-1 is affirmative, identify all persons upon whom LCL relies in support of this contention, along with a summary of their views or positions relevant to the subject matter of this contention.

2A-4. If the answer to Interrogatory 2A-1 is affirmative, identify all persons whom LCL intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

2A-5. If the answer to Interrogatory 2A-1 is affirmative, identify all documentary or other material that LCL intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

INTERROGATORIES ON AMENDED CONTENTION 3

3A-1. State whether LCL contends that the Staff's SER (§§ 15.2, 15.3, 22.2) fails to adequately resolve the issue(s) raised by Amended Contention 3.

3A-2. If the answer to Interrogatory 3A-1 is affirmative, state in detail the reasons and basis for LCL's contention.

3A-3. If the answer to Interrogatory 3A-1 is affirmative, identify all persons upon whom LCL relies in support of this contention, along with a summary of their views or positions relevant to the subject matter of this contention.

3A-4. If the answer to Interrogatory 3A-1 is affirmative, identify all persons whom LCL intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

3A-5. If the answer to Interrogatory 3A-1 is affirmative, identify all documentary or other material that LCL intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

INTERROGATORIES ON AMENDED CONTENTION 4

4A-1. State whether LCL contends that the Staff's SER (§§ 12.3, 15.4, 22.2) fails to adequately resolve the issue(s) raised by Amended Contention 4.

4A-2. If the answer to Interrogatory 4A-1 is affirmative, state in detail the reasons and basis for LCL's contention.

4A-3. If the answer to Interrogatory 4A-1 is affirmative, identify all persons upon whom LCL relies in support of this contention, along with a summary of their views or positions relevant to the subject matter of this contention.

4A-4. If the answer to Interrogatory 4A-1 is affirmative, identify all persons whom LCL intends to call as witnesses in this proceeding, along with a summary of their views or positions relevant to the subject matter of your contention.

4A-5. If the answer to Interrogatory 4A-1 is affirmative, identify all documentary or other material that LCL intends to use in this proceeding to support this contention and that you intend to offer as exhibits on this contention or to refer to during your cross-examination of witnesses presented by the Applicant and/or Staff.

Respectfully submitted,

Sherwin E. Turk

Sherwin E. Turk
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 13th day of August, 1981