

BEFORE THE
UNITED STATES OF AMERICA
ATOMIC ENERGY COMMISSION

3-29-73

In the Matter of

CONSOLIDATED EDISON COMPANY)
OF NEW YORK, INC. (Indian)
Point, Unit No. 2))

Docket No. 50-247

REQUEST TO APPLICANT AND
STAFF FOR ADMISSIONS

Pursuant to 10 CFR Part 2, Section 2.742 the following admissions are requested:

A. Genuineness of Documents

1. All documents and transcript pages identified from RM 50-1 by CCPE as relevant to its case here. ^{*/}
2. All documents examined by the Staff in the fuel densification analysis and identified by CCPE as relevant to its case here. ^{*/}
3. ACRS Watts Bar letter (September 21, 1972).

B. Facts

1. The effects of fuel densification were not taken into account in establishing the ECCS Interim Criteria.

^{*/} See CCPE Contentions and Position with Respect to Fuel Densification (Part I).

2. The causes of fuel densification are unknown and are under study.
3. Because the fuel densification phenomenon is not fully understood, steps taken to compensate for its effects have to include conservatism to compensate for uncertainties.
4. Neither the Staff nor the Applicant know what are the limits which bound all of the uncertainties associated with understanding and compensating for the effects of fuel densification.
5. If the calculated consequences of fuel densification are in error in a non-conservative direction, the computed peak clad temperatures for a LOCA with a proper densification analysis could exceed 2300°F.
6. If the present calculation of the effects of fuel densification and the alterations in plant design and operation are conservative, neither the Applicant nor the Staff know what is the margin of safety created by this conservatism.

Copies of the documents for which an admission of genuineness is sought have been provided to the Applicant and the Staff or are already in their possession.

Respectfully submitted,

Anthony Z. Roisman
Anthony Z. Roisman
Counsel for Citizens Committee
for Protection of the
Environment

Dated: March 29, 1973