

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF COMMONWEALTH)
EDISON CO. (Dresden Station,)
Units 2 and 3))
) Docket Nos. 50-237
) 50-249
Amendments to Facility)
Operating License Nos.)
DPR-19 and DPR-25)
(Increase Spent Fuel Storage)
Capacity))

SECOND AMENDED CONTENTIONS
OF THE STATE OF ILLINOIS

Following the discussion and argument by the parties at the prehearing conference on August 19, 1980, and by leave of the Board granted at that conference, the State of Illinois, Intervenor, submits its Second Amended Contentions. These contentions refine and consolidate Illinois' original Contentions 24-27, filed September 8, 1978, and Amended Contentions A-L, filed August 4, 1980; for the Board's convenience, reference is made to the previous contentions that addressed the subject of each revised contention listed below. The State withdraws all previously filed contentions and substitutes the following:

1. Applicant has not sufficiently demonstrated a need for the spent fuel pool storage expansion, in that:

A. It has not been demonstrated that failure to grant the license amendment would compel shutdown of Dresden Units 2 and 3.

B. There has been no demonstration that shutdown would adversely affect the community currently being served by Dresden Units 2 and 3. Applicant has not shown that its generating capacity cannot satisfy demand if Dresden Units 2 and 3 are shut down. (Amended Contention A)

2. The Application gives no assurance that the radioactive waste treatment system for the spent fuel pools is adequate for the proposed increase in spent fuel storage capacity. (Am. Cont. C)

3. The Application does not show that the quality control and quality assurance programs of Applicant and its contractors are adequate to assure that tube and rack construction and the boron-10 loading of the Boral in the tubes will meet specifications. (Cont. 26 and 27; Am. Cont. I)

4. The Application does not demonstrate that rack and tube packaging, transportation, and receipt inspections are adequate to prevent and detect transportation damage. (Cont. 26 and 27; Am. Cont. J)

5. Applicant has not provided adequate monitoring equipment in the spent fuel pool water to detect abnormal releases of radioactive materials from the increased numbers of spent fuel bundles. Absence of such monitoring and alarms could result in

undue exposure to workers in excess of ALARA, specifically:

- A. There is no description of monitoring devices, e.g., dedicated sippers and, therefore, no assurance exists that workers in each pool area will have adequate warning of possible hazardous conditions.
- B. The Applicant should demonstrate that the radiation monitoring equipment has adequate range and sensitivity to indicate accurately the rates and magnitudes of radiation releases that could occur in the reracked pools. (Am. Cont. F)

6. There is no assurance that the health and safety of workers in the spent fuel pool areas will be adequately protected during rack removal and installation, in that:

- A. The Application does not supply adequate information to assess the occupational radiation dosage to workers involved in removing and installing racks and rearranging spent fuel in the pools, and to other workers who may be in the pool areas.
- B. There is no consideration of the occupational radiation hazards from accidents that may occur as a result of rack removal and installation, e.g., flooding

of the pool area and water spraying on workers. (Cont. 24 and 25; Am. Cont. G and H)

7. The Application inadequately addresses the increased consequences of accidents considered in the FSAR, SER, and FES associated with the operating license review of Dresden Units 2 and 3 due to the increased number of spent fuel assemblies and additional amounts of defective fuel to be stored in the spent fuel pool as a result of the modification. (Cont. 24(D))

8. Corrosion.

The Application does not adequately assess the possibility of general corrosion and galvanic corrosion in the racks, in that:

- A. The life expectancy of the Boral tubes is unsubstantiated.
- B. Swelling of the Boral in the tubes and its effect on removal of fuel assemblies have not been analyzed.
- C. The corrosion surveillance program will not assure detection of corrosion in the racks because the samples to be inspected will not be representative of the actual tubes in the racks, because the sample environment will not represent pool conditions in and near the racks, and because the program does not require a dummy fuel test

shortly before placement of fuel in each tube.

D. There is no plan for steps to be taken should corrosion be discovered in the racks. (Am. Cont. K)

9. The Applicant should develop criteria for the racks defining when their use to store fuel would be proscribed. These criteria should be the acceptable amount of corrosion, limits on dimensional changes and strength tolerance. (Am. Cont. L)

10. Since the Application and supporting documentation do not include anti-sabotage and security plans, there is no assurance that adequate protection exists for the additional fuel to be stored. (Am. Cont. D)

STATE OF ILLINOIS

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PROOF OF SERVICE

I, ATHENA SHELTON, having been sworn and under oath, do state that I have this 27th day of August, 1980, served the foregoing NOTICE and SECONDED AMENDED CONTENTIONS upon the persons to whom said Notice is directed, by placing same in envelopes addressed to said persons, first class mail, postage prepaid, and depositing same with the United States Post Office, located at 160 North LaSalle Street, Chicago, Illinois 60601.

ATHENA SHELTON

SUBSCRIBED AND SWORN TO
BEFORE ME THIS 27th DAY
OF AUGUST 1980.

Notary Public