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Docket No. 50-~~20~~237

MEMORANDUM FOR: Thomas D. Murphy, Chief
Radiological Assessment Branch, DSI

FROM: Thomas Ippolito, Chief
Operating Reactor Branch #2, DL

Dennis M. Crutchfield, Chief
Operating Reactors Branch#5, DL

SUBJECT: DRESDEN SPENT FUEL POOL HEARING TESTIMONY

Please assign a reviewer to provide testimony for contention #5 of the Second Amended Contentions of the State of Illinois (Enclosure 1).

The reviewer should be identified by September 15 in order to accomodate the the Hearing Board's schedule for a November 19, 1980 hearing.

Please use TACA #7635 for this review and follow the schedule (Enclosure 2).

Thomas Ippolito, Chief
Operating Reactors Branch #2
Division of Licensing

Dennis M. Crutchfield, Chief
Operating Reactors Branch#5
Division of Licensing

Enclosures:

1. Second Amended Contentions of the State of Illinois
2. 9/4/80 Memo. to P. W. O'Connor from OELD

memo 4

8010230229

PWT

OFFICE	DL: ORB #5	DL: ORB #2	DL: ORB #5		
SURNAME	PO'Connor:cc	Tippolito	DCrutchfield		
DATE	9/15/80	9/16/80	9/16/80		

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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 documenta-
tion 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

TYRONE C. FAHNER
Attorney General

BY: Susan N. Sekuler
SUSAN N. SEKULER
Assistant Attorney General

OF COUNSEL

SUSAN N. SEKULER
ANNE K. MARKEY

Assistant Attorneys General
Environmental Control Division
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601
(312)793-2491

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



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

September 4, 1980


MEMORANDUM FOR: Paul O'Connor, Project Manager, Dresden 2/3 SFP

FROM: Richard J. Goddard, Attorney
Office of the Executive Legal Director

SUBJECT: PREPARATION OF TESTIMONY

1. Enclosed are copies of the State of Illinois' (Intervenor) Second Amended Contentions in the Dresden Spent Fuel Pool Modification Proceeding. While the Board has not yet determined which contentions will be admissible, and will probably promulgate additional questions to be answered by Staff on their own initiative, I consider it likely at this time that Contentions 2-9 set forth therein will be the subject of litigation in the evidentiary hearing scheduled to begin on November 19, 1980. Accordingly, I would like to begin at this time to proceed toward identifying the appropriate reviewers on each of these contentions, and the preparation of testimony for presentation at the hearing. Until I receive the order of the Licensing Board following the Special Prehearing Conference, which rules on the admissibility of each of the contentions, I am not concerned with assignment of a reviewer for Contentions 1 and 10 or the preparation of testimony which would address those contentions.
2. Due to the relatively short time period preceding this hearing, I propose that we adhere to the following schedule:
 - September 15 - The reviewers who will prepare the testimony addressing Contentions 2-9 should be identified to me.
 - September 22 - I would like to arrange a meeting with you and each of the reviewers who have been identified. By this time, each of the reviewers should have a position with regard to the contentions and any problems which they foresee should be presented to you prior to this meeting.
 - October 6 - An outline of each reviewer's testimony should be available to you and me for our review.
 - October 14 - Draft testimony (draft means in detail appropriate for presentation at an evidentiary hearing, subject to our editing or modifications) should be made available to you and to me.

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- October 28 - All testimony should be in final form on this date without exception in order that it may be delivered to reproduction for the appropriate number of copies to be reproduced in time for our filing deadline.
- November 4 - All testimony is due to be served on this date. Because two of the three Licensing Board members do not live in the Bethesda area, I would like to be able to serve our testimony by mail before this date.
- November 19 - The hearing is scheduled to begin in the Chicago or Morris, Illinois area.
3. If the schedule set forth herein is not acceptable to you, or if any modifications thereof are in order, please let me know at your earliest convenience.
4. My co-counsel in this proceeding will be Charles Barth (27455).
- 
- Richard J. Goddard, Attorney
Office of the Executive Legal Director
- Enclosure: As stated
- cc: D. Crutchfield ✓
W. Olmstead
C. Barth

DUPE 800 904 0200 (2 pp.)

that a decision on the admission of Second Amended Contention 10 should be held in abeyance until October 1, 1980. During the interim, Applicant will make the security plan available to the State for inspection. If the State, after review of the security plan, finds that the plan is inadequate to assure protection against sabotage, as related to the spent fuel modification, the State shall have until October 1, 1980, to modify its security/sabotage contention. Should the State take no action by October 1, 1980, Second Amended Contention 10 shall be deemed withdrawn.

Very truly yours,

Susan N. Sekuler (by LHM)

SUSAN N. SEKULER
Assistant Attorney General
Environmental Control Division
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601
(312) 793-2491

SNS:AKM:acs

cc: Philip Pendleton Steptoe III
Richard Goddard

encl.

August 27, 1980

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)
)

N O T I C E

TO: See attached Service List

PLEASE TAKE NOTICE that I have today filed with
the Docketing and Service Section of the U.S. Nuclear Regulatory
Commission the State of Illinois Second Amended Contentions, a
copy of which is attached hereto and herewith served upon you.

TYRONE C. FAHNER
Attorney General
State of Illinois

BY: Susan N. Sekuler (Assistant)
SUSAN N. SEKULER
Assistant Attorney General
Environmental Control Division
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601
(312) 793-2491

DATED: August 27, 1980

DUPE 800904 0208 (2pp)

IN THE MATTER OF COMMONWEALTH EDISON CO., DRESDEN STATION,
Units 2 and 3 ---- Docket Nos. 50-237 and 50-249

SERVICE LIST

John F. Wolf, Esq.
3409 Shepherd Street
Chevy Chase, Maryland 20015

Dr. Linda W. Little
5000. Hermitage Drive
Raleigh, North Carolina 27612

Dr. Forrest J. Remick
305 East Hamilton Avenue
State College, Pennsylvania 16801

Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Philip P. Steptoe III, Esq.
Isham, Lincoln & Beale
One First National Plaza
42nd Floor
Chicago, Illinois 60603

Richard Goddard
Office of Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555