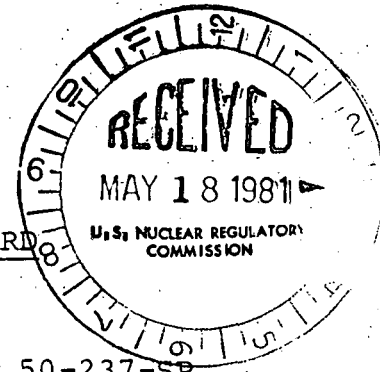


5/11/81

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter Of )  
COMMONWEALTH EDISON COMPANY )  
(Dresden Stations Units 2 & 3) )

Docket Nos. 50-237-SP  
50-249-SP  
(Spent Fuel Pool Modification)

Dear Administrative Judges:

In response to Applicant's affidavit of A. K. Singh filed on May 8, 1981, Intervenor makes the following comments:

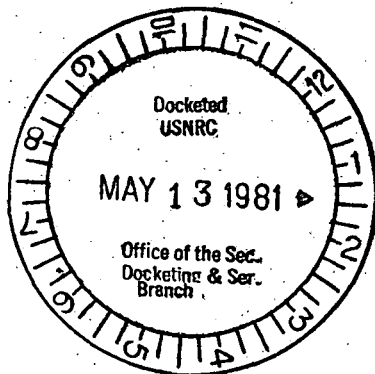
The vertical design response spectra may not be conservative. It is not clear that Applicant's reanalysis of spent fuel structure systems and components was in accordance with practices outlined in Reg Guide 1.60 and 1.61.

Reg Guide 1.60 provides that the vertical design response spectra values are 2/3 those of the horizontal spectra for frequencies less than 0.25; for frequencies higher than 3.5, they are the same, while the ratio varies between 2/3 and 1 for frequencies between 0.25 and 3.5.

In contrast, p. 3 of Mr. Singh's affidavit states that a vertical component equal to 2/3 of the horizontal component was considered in the plant design. This implies that 2/3 was used for all frequencies, leading Intervenor to the conclusion that the vertical design response spectra may not be conservative.

Secondly, in reference to page 7 of the Singh affidavit, the damping values for reinforced concrete structures appear to exceed the values set forth in Table 1 of Reg Guide 1.61 for the Safe Shutdown earthquake. The staff's senior seismic review team's evaluation considered 10% damping, while Reg Guide 1.61 recommends the use of 7% damping. It is not clear what damping value Applicant used.

Respectfully submitted,  
PEOPLE OF THE STATE OF ILLINOIS  
TYRONE C. FAHNER  
Attorney General  
State of Illinois



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//

BY:

*Mary Jo Murray*

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DATED: May 11, 1981

cc: Service List

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter Of )  
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COMMONWEALTH EDISON COMPANY ) Docket Nos. 50-237-SP  
 ) 50-249-SP  
 )  
(Dresden Stations Units 2 & 3) ) (Spent Fuel Pool Modification)

CERTIFICATE OF SERVICE

I hereby certify that copies of Intervenor's response to the affidavit of Singh in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, postage prepaid:

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

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

Dr. Forrest J. Remick  
305 E. Hamilton Avenue  
State College, Pa. 16801

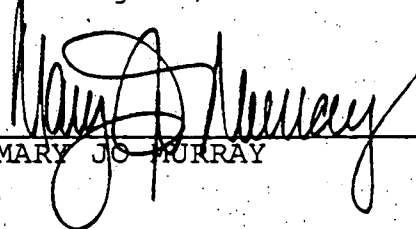
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Atomic Safety and Licensing Board  
U.S. NRC  
Washington, D.C. 20555

Atomic Safety and Licensing Appeal  
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Docketing and Service Section  
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\_\_\_\_\_  
MARY JO MURRAY