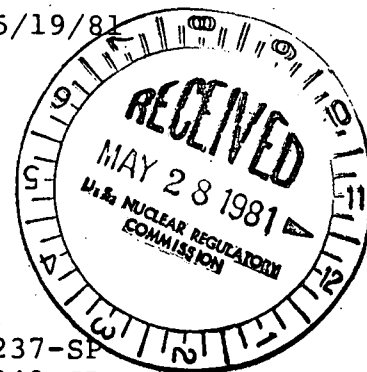


5/19/81



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	Docket Nos. 50-237-SP
COMMONWEALTH EDISON COMPANY	)	50-249-SP
	)	(Spent Fuel Pool
(Dresden Station, Units 2 & 3))	)	Modification)

APPLICANT'S RESPONSE TO INTERVENOR'S  
PROPOSED SUPPLEMENTAL FINDINGS OF FACT  
AND CONCLUSIONS OF LAW

Pursuant to 10 CFR §2.754, Applicant submits the following response to Intervenor's Supplementary Findings of Fact and Conclusions of Law.

Applicant urges the Board to reject all of Intervenor's proposed findings and conclusions of law in favor of Applicant's own findings and conclusions of law, which more accurately reflect the evidentiary record. The comments below are confined to pointing out errors and omissions in Intervenor's summary of the record. No attempt is made to dispute Intervenor's conclusions, with which, of course, Applicant disagrees.

Intervenor's  
Proposed  
Finding

Applicant's Comment

52c

Dr. Wong stated that the effect of fuel channel bowing on criticality would be negligible. (Tr. 823).

160

All of the dimensions in this paragraph are wrong. The maximum outside dimension of a channel is 5.454 inches, not 4.454.

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PSOS  
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Intervenor's  
Proposed  
Findings

Applicant's Comment

The spacer button adds .309 inches to this for a total of 5.763. Finally, it would be erroneous to add any convexity allowance to the spacer button dimension because the two do not occur at the same place. (Tr. 736, 796-97).

161

This paragraph seems to claim for Intervenor the credit for bringing to light the fuel channel bowing issue during its cross-examination of Staff witness Paul O'Connor in the November hearings, which is misleading. The issue was raised by Applicant and voluntarily disclosed by Applicant to the other parties in advance of the hearing. (O'Boyle, prepared testimony at pp. 5-8, following Tr. 1013).

164-166

It is difficult to understand Intervenor's point. If Intervenor is suggesting that some of Applicant's channel side measurements represent average or composite values of bow plus bulge for more than one side of the same channel, this is incorrect. (Tr. 774-778).

Intervenor's  
Proposed  
Finding

Applicant's Comment

On the other hand, if Intervenor means that the percentage of channels with bow plus bulge for at least one side greater than X mils would be slightly different than the percentage of channel sides with bow plus bulge greater than X mils, this is correct. Dr. O'Boyle's testimony gives the percentage of channel sides, not the percentage of channels. The percentages will be different because 1736 channel sides, versus 875 channels were measured. (O'Boyle prepared testimony at pp. 8-9, following Tr. 1013).

171

Mr. Gilcrest testified that creases would not cause interference in the proposed racks. (Tr. 931-32). He testified that hydrogen bubbles or blisters causing interference would be highly unlikely. (Tr. 930-31). And he testified that none of the tolerances, potential corrosion blisters, or other testimony in this case affects his conclusions concerning the safety of the proposed racks. (Tr. 954-959).

Intervenor's  
Proposed  
Finding

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Applicant's Comment

Mr. Mefford testified that he does not consider himself an expert in metallurgy or fuel channel bowing. He did not agree or disagree with Dr. O'Boyle's conclusions about the likelihood of heat-treatment and fabrication processes decreasing future bow, because he did not know. (Tr. 870-71).

175-176

Applicant's witness, Dr. O'Boyle, said that if the corrosion test program shows signs of boral corrosion, he would recommend that Applicant test some tubes with a mandrel. (Tr. 771772). Dr. O'Boyle also testified that he agreed with Applicant's decision not to conduct routine periodic mandrel testing. (Tr. 783).

177

Mr. Ragan testified that although there are no procedures covering assemblies falling across fuel racks, there are procedures covering the evacuation of personnel in the event of a high radiation condition on the refueling floor. (Tr. 915). He also testified that if the grapple failed there are auxiliary hoists which could be used to lift a fuel assembly. (Tr. 916).

Intervenor's  
Proposed  
Finding

178

Applicant's Comment

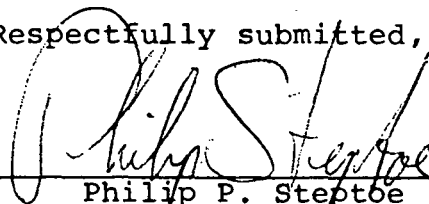
The maximum bow plus bulge of 420 mils was measured on a fuel channel which had been exposed for five cycles at Quad Cities, four of which were on the core periphery. (Tr. 751-52).

Dr. O'Boyle testified that Applicant follows the intent of the G.E. recommendation that channel exposures be limited to 33 megawatt days per standard ton, by measuring actual channel deformations. (Tr. 798-99).

180

The proposed racks were designed in 1977, before the phenomenon of fuel channel bowing was understood. (Tr. 928). The fact that Applicant has allowed construction of the proposed racks to continue is irrelevant because Applicant's analysis shows the racks are safe, and because the Board must approve the proposed racks before they are used.

Respectfully submitted,



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NUCLEAR REGULATORY COMMISSION

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In the Matter of )  
COMMONWEALTH EDISON COMPANY ) Docket Nos. 50-237-SP  
(Dresden Station, Units 2 & 3)) (Spent Fuel Pool  
Modification) 50-249-SP

CERTIFICATE OF SERVICE

I, Philip P. Steptoe, one of the attorneys for Commonwealth Edison Company, certify that copies of Applicant's Response to Intervenor's Proposed Supplemental Findings of Fact and Conclusions of Law has been served in the above-captioned matter on the following by depositing the same in the United States mail, first class postage prepaid, this 18th day of May, 1981:

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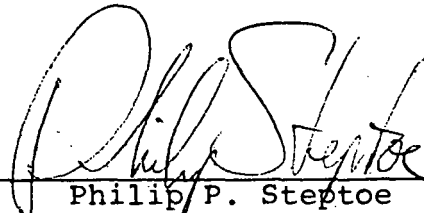
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