

6/30/78  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
	)	
PUBLIC SERVICE ELECTRIC & GAS	)	Docket No. 50-272
COMPANY, et al.	)	(Proposed Issuance
	)	of Amendment to
(Salem Nuclear Generating	)	Facility Operating
Station, Unit 1)	)	License No. DPR-70)

LICENSEE'S ANSWER TO LOWER ALLOWAYS CREEK TOWNSHIP'S  
FURTHER SPECIFICATION OF CONTENTION 8

By letter dated June 22, 1978, counsel for Lower Alloways Creek Township ("LACT"), <sup>1/</sup> an intervenor in the captioned proceeding, informed the presiding Atomic Safety and Licensing Board ("Licensing Board") that LACT had rejected a settlement offer made by Public Service Electric & Gas Company, Licensee in the captioned proceeding. The letter also informed the Licensing Board that LACT had abandoned Contention 7 and contained the following suggested language for Contention 8:

Under the proposed modification, there will be increased reliance on the Residual Heat Removal System. The increased reliance and probability of overload will lessen the ability of the system to perform its safety back-up function. The probability and consequences of failure under increased load should be determined.

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<sup>1/</sup> Accompanying the letter was a Notice of Appearance for Carl Valore, Jr. on behalf of Lower Alloways Creek Township.

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As discussed below, Licensee submits that LACT has still not given sufficient specificity to proposed Contention 8 and it should not be admitted as an issue in the proceeding.

The Licensing Board's Order Following Special Pre-hearing Conference dated May 24, 1978 at 4, stated that "the Township shall submit . . . the language of its Contentions 7 and 8 in final form for decision." The Licensing Board's Memorandum and Order of April 21, 1978 at 4, stated:

Contentions 7 and 8 appear to contain subject matter which could possibly serve as the basis for a valid contention if developed and clarified. In view of the specificity of the Licensee's description of the proposed cooling system, it is not reasonable to contend that the Licensee has 'failed to consider' the impact on that system of the additional spent fuel. If the Petitioner objects to some aspect of the proposed cooling system, it should so inform the Board. The Board has a similar view with respect to Contention 8.

As originally drafted by LACT, Contention 8 reads as follows:

The Licensee has failed to demonstrate that increased reliance

on the Residual Heat Removal System to provide coolant for the spent fuel under the proposed modification would not lessen the ability of that system to perform its safety functions while serving as a backup heat sink for the spent fuel.

Intervenor has failed to remedy the defects which the Board found in the original statement of Contention 8 and, thus, it should not be admitted as an issue.

Initially, the contention is factually incorrect and bears no relationship to the design of the Salem Nuclear Generating Station, Unit 1.<sup>2/</sup> The Residual Heat Removal ("RHR") System does not serve as a backup heat sink for the spent fuel. LACT does not give any specificity regarding its assertion that the RHR system performance would somehow be affected. The spent fuel cooling system utilizes its own heat exchangers which reject heat to the component cooling water system and there is no direct connection to the Residual Heat Removal System. Thus there cannot be "increased reliance on that system" as asserted by LACT.

Moreover, because of the design of the spent fuel cooling system for Salem Nuclear Generating Station Unit 1, it was analyzed without reliance on even the component cooling water system:

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<sup>2/</sup> See Iowa Electric Light & Power Company et al. (Duane Arnold Energy Center), ALAB-108, 6 AEC 195, 196 (1973) for an example of the Atomic Safety and Licensing Appeal Board's affirmance of a decision rejecting contentions "which were lifted indiscriminately from petitions filed in other proceedings, since they are wholly inapplicable to the facility under consideration here."

Since the cooling system is designed as a non-seismic Category I system, the applicants have provided redundant pool makeup water sources to ensure a reliable supply of makeup water, i.e., four different systems are available. However, to further ensure reliability, the following additional measures were taken. Valves were installed on existing spare nozzles on the refueling water storage tank for both units. A portable pump will be provided with the capability to deliver 100 gallons per minute makeup water flow from one of the refueling water storage tanks directly to the spent fuel pool. The valves installed on the tank will be locked closed and capped, and will be under administrative control. The portable pump and hose will also be under administrative control to ensure constant and timely availability.

We have reviewed the system design, component classifications, and design codes for the spent fuel pool cooling system and find them acceptable. 3/

The spent fuel cooling system design basis is unchanged by the spent fuel rack modification. The Description and Safety Analyses, Spent Fuel Storage Rack Replacement, No. 1 Unit, evaluates fuel rod clad temperatures under the same design basis, hypothetical loss of forced coolant circulation conditions. 4/ Thus, should there be an instance where the Residual Heat Removal System be

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3/ Safety Evaluation of the Salem Nuclear Generating Station, Units 1 and 2, dated October 11, 1974 at 9-7. See also Response to NRC Questions 9.10 and 9.48 contained in Volume 7 of the Final Safety Analysis Report.

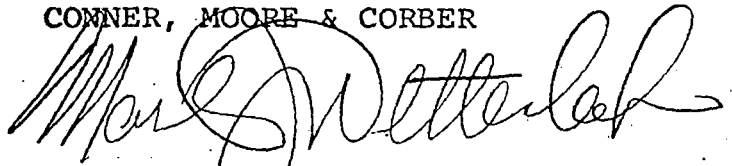
4/ See pp. 26-29.

required in case of an accident, because the spent fuel pool has been analyzed as not requiring outside heat exchange, there would be, in that case, no interaction with the RHR system.

For these reasons, revised Contention 8 should not be admitted as an issue in this proceeding.

Respectfully submitted,

CONNOR, MOORE & CORBER

A handwritten signature in cursive script, appearing to read "Mark J. Wetterhahn".

Mark J. Wetterhahn  
Counsel for Licensee

Of Counsel:

Richard Fryling, Jr., Esq.

June 30, 1978

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NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

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COMPANY, et al. )  
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(Salem Nuclear Generating )  
Station, Unit 1) )

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Answer to Lower Alloways Creek Township's Further Specification of Contention 8," dated June 30, 1978, in the captioned matter, have been served upon the following by deposit in the United States mail this 30th day of June, 1978:

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