

4/25/79

DOCKET NUMBER

PROD & INST. FB

0-272

OUTLINE OF INTERVENORS,
COLEMANS, CROSS-EXAMINATION

CONTENTIONS TWO AND SIX



2. The licensee has given inadequate consideration to the occurrence of accidental criticality due to the increased density or compaction of the spent fuel assemblies. Additional consideration of criticality is required due to the following:

- A. deterioration of the neutron absorption material provided by the Boral plates located between the spent fuel bundles;
- B. deterioration of the rack structure leading to failure of the rack and consequent dislodging of spent fuel bundles.

6. The licensee has given inadequate consideration to qualification and testing of Boral material in the environment of protracted association with spent nuclear fuel, in order to validate its continued properties for reactivity control and integrity.

I. The Potential for the Occurrence of Accidental Criticality in the Spent Fuel Pool and failure of the reactivity and structural support fixtures in the spent fuel pool to meet design specifications.

A. Deterioration of the neutron absorption material in the fuel racks.

- 1. Cross-examination of NRC staff and PSE&G Co. witnesses shall address the computational analysis performed on the compact rack configuration to verify compliance with the criticality K_{eff} of 0.95 (estimated time of cross-examination: 3 hrs.)

forthwith to resolve the problem without vitiating the integrity of the reactivity control and structural support fixtures in the spent fuel pool (estimated time of cross-examination: 3 hrs.)

LOWER ALLOWAYS CREEK TOWNSHIP

CONTENTION NUMBER ONE

1. The Licensee has not considered in sufficient detail possible alternatives to the proposed expansion of the spent fuel pool. Specifically, the Licensee has not established that spent fuel cannot be stored at another reactor site. Also while the GESMO proceedings have been terminated, it is not clear that the spent fuel could not by some arrangement with Allied Chemical Corp. be stored at the AGNS Plan in Barnwell, South Carolina. Furthermore, the Licensee has not explored nor exhausted the possibilities for disposing of the spent fuel outside of the U.S.A.

I. Inadequate Consideration by the NRC Staff and Utility of Viable Alternatives to the proposed High Density Reracking of the Salem One Nuclear Generating Station Spent Fuel Pool.

- A. Use of storage capacity available at existing Away From Reactor (AFR) reprocessing plants (30 minutes).
- B. Construction of new AFR storage capacity at isolated, unpopulated areas of the United States (30 minutes).
- C. Storage of spent fuel generated at Salem One Nuclear Generating Station at other active or decommissioned nuclear reactor sites (30 minutes).
- D. Slow down or cessation of spent fuel generation until AFR storage capacity can be implemented (30 minutes).

2. Cross-examination of these witnesses will also address the criticality hazards presented by cell venting to dissipate hydrogen gas build up, in addition to the explosive potential associated with such venting and hydrogen gas releases into the spent fuel pool building (estimated time of cross-examination: 2 hrs.)

B. Deterioration of the spent fuel pool rack structure

1. Cross-examination of the NRC staff and utility witnesses will address the unresolved safety problems associated with fuel design changes, inability to maintain proper boric acid concentration in the spent fuel pool and venting procedures which separately or in combination could result in total or partial rack failure (estimated time of cross-examination: 3 hrs.)

C. Qualification and testing of the boron material over a protracted period of time in a spent fuel pool environment.

1. Cross-examination of the NRC staff and utility witnesses will address the insufficient and inadequate surveillance and fuel storage management procedures to assure that no significant deterioration in the boron material occurs without prompt recognition of the hazard posed thereby and appropriate steps are implemented

In addition to the above areas of cross-examination, the intervenors intend to explore, possibly both through direct testimony and cross-examination, the matters of ASLB interest pertaining to the Three Mile Island-2 accident and raised by the several limited appearance statements specified by the Board for consideration at these hearings.

Inasmuch as we are not in receipt of any proposed direct testimony pertaining to these issues filed by any other party to this proceeding, I am unable to prepare an outline of proposed cross-examination. Nonetheless, I anticipate that in light of the absence of such pre-filed direct testimony, none is required under these circumstances.

Respectfully submitted,



KEITH A. ONSDORFF
Assistant Deputy Public Advocate

CERTIFICATION OF SERVICE

I hereby certify that copies of this outline of cross-examination have been served upon all parties to this action by deposit in the United States mail this 25th day of April, 1979.



KEITH A. ONSDORFF