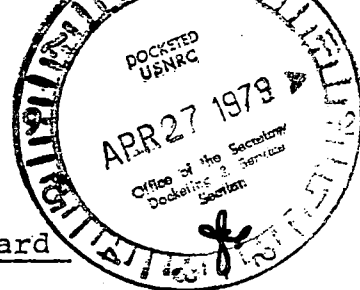


UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board



4/25/79

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

OUTLINE OF CROSS-EXAMINATION  
OF EVIDENCE SUBMITTED  
BY THE NUCLEAR REGULATORY COMMISSION

Pursuant to the Pretrial Order of March 29 , 1979 as amended, the Intervenor, Township of Lower Alloways Creek, submits the following outline of proposed cross-examination.

1. Have modifications been considered to the purification system in the event of a loss of water accident in the spent fuel pool at full capacity for storage without room for a full core discharge through 1996?
2. The basis for the statement in the Environmental Appraisal that the major portion of the radioactivity decays in the first 150 days following removal from the reactor core.
3. The basis for the statement in the Environmental Appraisal that the proposed modification of the spent fuel pool will not change the basic land use of the spent fuel pool.

4. Whether there will be a change in the plant water consumption in the event of a loss of water accident in the spent fuel pool with the pool full without core discharge by the year 1996.

5. That the potential off-site radiological environmental impact associated with the expansion of the spent fuel storage capacity do not consider a loss of water accident in the spent fuel pool or a Class 9 accident or melt down or explosion in the reactor which would involve the spent fuel pool.

6. Has the Environmental Appraisal considered the potential radioactive release of Krypton 89 and its daughter Strontium 89?

7. Since the NRC has calculated five years would be required to construct an Independent Spent Fuel Storage Installation, (ISFSI), why hasn't the NRC staff taken a position that increased capacity may not be required (given expected plant down time) since an ISFSI could be available prior to 264 fuel assemblies being stored in the spent fuel pool.

8. Is the five year estimate for an ISFSI by the NRC in the Environmental Appraisal realistic?

9. How many metric tons of uranium (MTU) are 264 fuel assemblies? 1,170 fuel assemblies?

10. The validity of the statement in the Environmental Appraisal that on a short term basis, i.e., prior to 1985, an ISFSI is not available for an alternative.

11. In evaluating alternatives in the Environmental Appraisal and the conclusion that the environmental impacts of new storage would be less than the environmental impacts of an ISFSI excludes from its consideration a serious accident involving the reactor and spent fuel pool at full storage.

12. In considering alternatives, did the NRC consider the danger to the safety and health of the public in accumulating large amounts of radioactive fuel assemblies in the spent fuel pool in close proximity to the nuclear reactor considering the probable risks and consequences that could be associated with those risks.

Estimated time for cross-examination - 2 hours - 4 hours

TOWNSHIP OF LOWER ALLOWAYS CREEK  
INTERVENOR,

BY:

  
CARL VALORE, JR., Special  
Nuclear Counsel

April 25, 1979

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board



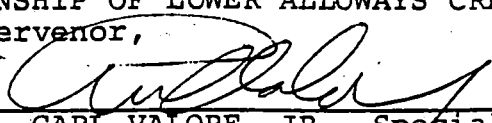
In the Matter of	:	Docket No. 50-272
PUBLIC SERVICE ELECTRIC & GAS CO.	:	Proposed Issuance of Amendment to Facility Operating License No. DPR-70
(Salem Nuclear Generating Station, Unit #1)	:	

INTERVENOR TOWNSHIP OF LOWER ALLOWAYS CREEK  
OUTLINE OF CROSS-EXAMINATION OF EVIDENCE SUBMITTED  
BY THE LICENSEE, PUBLIC SERVICE ELECTRIC & GAS CO.

1. What information has the Licensee provided as to the Licensee's activities to obtain and construct an ISFSI?
2. Has the Licensee performed a real estate survey as to the available tracts of ground in dry unpopulated areas of the United States available for an ISFSI?
3. Has the Licensee developed a timetable acquisition, license and/or construction of an ISFSI?
4. Has the Licensee performed a detailed cost analysis of the ISFSI alternative as compared to the proposed action?

Estimated time for cross-examination 1 hour to 3 hours

TOWNSHIP OF LOWER ALLOWAYS CREEK  
Intervenor,

BY:   
CARL VALORE, JR., Special Nuclear Counsel

April 25, 1979

UNITED STATES OF AMERICA

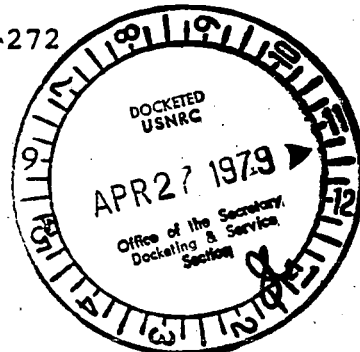
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of :

PUBLIC SERVICE ELECTRIC  
& GAS CO.  
(Salem Generating Station  
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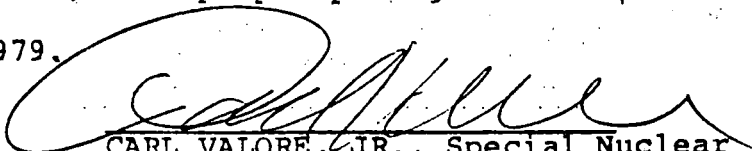
DOCKET NO. 50-272



CERTIFICATE OF SERVICE

I hereby certify that copies of Intervenor's Township of Lower Alloways Creek's outline of cross-examination of evidence submitted by the licensee and NRC

in the above captioned matter have been served upon the attached list by deposit in the United States mail at the post office in Northfield, N.J., with proper postage thereon, this 25th day of April, 1979.

  
CARL VALORE, JR., Special Nuclear  
Counsel for the Intervenor, the  
Township of Lower Alloways Creek

Dated: April 25, 1979

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