

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
PACIFIC GAS AND ELECTRIC COMPANY) Docket No. 50-133
) License No. DPR-7
(Humboldt Bay Power Plant, Unit No. 3))
)

REPLY TO INTERVENORS' MEMORANDUM
IN SUPPORT OF ANSWER IN OPPOSITION TO
LICENSEE'S MOTION TO HOLD PROCEEDINGS IN ABEYANCE

Intervenors urge that Pacific Gas and Electric Company's ("PGandE") motion to hold these proceedings in abeyance for an additional twelve (12) months be denied for the following reasons:

- (1) PGandE is merely delaying the inevitable closing of the plant.
- (2) Further delay will economically prejudice them.
- (3) Further delay will have serious health implications for PGandE employees.

PGandE contends that it is acting in good faith in seeking the additional time to accomplish those tasks as outlined in the Woodward-Clyde Consultants' Report attached to our Motion.

THE DELAY ISSUE

The scope of work document prepared by Woodward-Clyde Consultants ("WCC") and submitted with PGandE's motion reflects that the geological and seismological studies have been ongoing since March 1978. As that document indicates, the results of completed work in turn defines, in part, the scope of the continuing investigations. (WCC Report, p. 2-1). Numerous borings (25) have been drilled in the vicinity of the plant to determine the

1494 173
7912050 351

subsurface structure (WCC Report, p. 2-2) and additional borings to further clarify the subsurface structure are planned. (WCC Report, Fig. 3-1, 3-2, 3-3, and 3-4). These and other tasks have been, and are being, performed to comprehensively define the geology of the area to resolve concerns expressed by the NRC Staff. These studies, which are not inexpensive, are not being used as a delaying tactic by PGandE as alleged by the intervenors.^{1/} To the contrary, these studies are incrementally and logically planned to develop evidence to resolve the issues raised herein and allow for the return of the unit to service as soon as reasonably possible. PGandE has a genuine interest in having the Humboldt facility return to service in a timely manner and will continue to submit status reports to this Board evidencing its progress every 60 days.

THE ECONOMIC ISSUE

As for the argument that intervenors will be economically harmed by any further delay, PGandE submits that that issue is more properly directed to the California Public Utilities Commission, which is currently considering the status of the Humboldt facility for ratemaking purposes.

^{1/} The references to testimony of J. O. Schuyler (Interv. Memo, p. 8-9) as evidencing that further continuances will be sought by PGandE is inaccurate. A careful reading of Mr. Schuyler's testimony indicates that his references to further delay of up to two years was in response to a question of when the plant could go back into operation after the completion of hearings.

THE RADIATION EXPOSURE ISSUE

The final argument raised by intervenors concerns alleged unnecessary exposure of workers to radiation at the plant. In support of this assertion, they quote statistics from NUREG-0482, Occupational Radiation Exposure at Light Water Cooled Power Reactors Annual Report for 1977 published in May 1979 reflecting the high radiation exposure levels at the facility in 1977.

Initially, it should be emphasized that PGandE is committed to insuring the safe operation of its nuclear plants and the protection of its employees and others from excessive radiation exposure. As with many statistical reports such as NUREG-0482, when one examines the background facts upon which the statistics are compiled, oftentimes reasonable explanations exist to justify an apparent inconsistency. This is such a case.

During the year 1977, the Humboldt Bay Power Plant Unit No. 3 was undergoing extensive modifications which required work to be performed in radiation areas. There was also special maintenance performed which involved replacing the feedwater sparger and repairing the feedwater nozzle. These jobs resulted in additional radiation exposure which would not normally be experienced in an operating year.

As the attached Humboldt plant personnel exposure reports for 1977 indicates (Attachments 1), for the year 1977, out of a total exposure of 1857 man-rem, 338 man-rem or 18 percent was associated with special maintenance and 1418 man-rem or 76 percent was associated with construction activities. For the year 1978, (Attachment 2), the total personnel exposure for the

plant was reduced to 318 man-rem even though some construction activities and special maintenance continued during the early part of this year and accounted for 253 man-rem and 40 man-rem of exposure respectively. These radiation exposure reports and other supporting data were periodically furnished to the NRC for its information and review in accordance with applicable regulations. In no situation did radiation exposures exceed annual NRC radiation exposure criteria. PGandE estimates that the personnel exposure at the plant for the first eight months of the year 1979 is less than 23 man-rem for all categories of work.

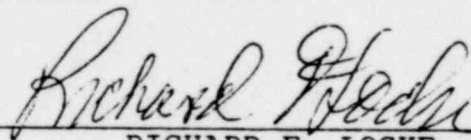
Thus, the record simply does not support the intervenors' assertion that further delay will result "in a large number of additional unnecessary worker exposures to radiation."

For the foregoing reasons, PGandE requests that the Motion be granted.

Respectfully submitted,

MALCOLM H. FURBUSH
PHILIP A. CRANE, JR.
RICHARD F. LOCKE

By



RICHARD F. LOCKE

Counsel for

PACIFIC GAS AND ELECTRIC COMPANY
77 Beale Street, 31st Floor
San Francisco, California 94106
Telephone: (415) 781-4211

DATED: October 31, 1979

1494 176