

## BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of
HOUSTON LIGHTING & POWER COMPANY
(Allens Creek Nuclear Generating Station, Unit 1)

Docket No. 50-466

JOHN F. DOHERTY'S CONTENTION #45, NEED FOR ADDITIONAL LATERAL SUPPORT IN THE REACTOR CORE.

John F. Doherty, Intervenor in the above Construction License proceeding files this Contention #45, and supporting statement to justify lateness in filing.

## CONTENTION #45

Intervenor contends that lateral support of the ACNGS reactor core is not sufficient to withstand the lateral force applied to the core due to flashing which occurs near the end of the subcooled blowdown portion of the LOCA transient. Further, that such a lateral force has not been considered in Applicant's NSSS vendor's analysis and may result in a 10 - 15% change in maximum calculated impact load for a given spacer grid, and a 30% increase in impact load is likely if two fuel assemblies interact at the periphery of the core. Following the recommendation of NUREG/CR-1018, "Review of LWR Fuel System Mechanical Response with Recommendations for Component Acceptance Criteria", Applicant's fuel assembly support against lateral LOCA forces should be increased by:

- 1) additional lateral support equal to 30% of the support against the Safe Shutdown Earthquake, or
- 2) a factor for the LOCA or Safe Shutdown Earthquake LOCA analysis of 1.3

## SUPPORTING STATEMENT

This Interveror's sole source of information on lateral loads of this severity being introduced in the event of LOCA is NUREG/CR-1018, which was first available to him on October 24, 1979. Although the publication date is September, 1979.

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Therefore untimeliness should be considered with these dates in mind. Below are listed this party's defenses to untimeliness assertions as required by 10 CFR 2.714.

- 1/ This issue is not part of any current Commission rulemaking to my knowledge, and henceapplicant is not required to take steps to remedy this problem.
- 2/ The App ident is not known to be following the recommendation of NUREG/CR-1018 sua sponte to this Intervenor's knowledge.
- 3/ The contention may prove helpful if argued at this forum toward any subsequent rulemaking. Indeed, it may spur such attention
- 4/ No other party has raised this issue to this Intervenor's knowledge.

5/ This intervenor is well versed in this proceeding and should be able to present the contention's consideration without slowing matters down, but instead but instead present it such that a safer plant is constructed.

Copies of "JOHN F. DOHERTY'S CONTENTION #45, NEED FOR ADDITIONAL LATER SUPPORT IN THE REACTOR CORE" were served on the parties below by First Class U. S. Postal Service on \_\_\_\_\_\_\_ December, 1979.

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Respectfully Submitted,

John F. Doherty Intervenor

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