

December 20, 1979

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
SACRAMENTO MUNICIPAL UTILITY DISTRICT ) Docket No. 50-312  
 )  
(Rancho Seco Nuclear Generating )  
Station) )

LICENSEE'S SECOND SET  
OF INTERROGATORIES TO  
CALIFORNIA ENERGY COMMISSION

Pursuant to 10 C.F.R. § 2.740b, Licensee requests that the California Energy Commission ("CEC") answer separately and fully in writing, and under oath or affirmation, each of the following interrogatories, within 14 days after service (i.e., on or before January 8, 1980). Licensee requests that the person or persons answering each interrogatory be identified and that the source of information be disclosed where an answer is based in whole or in part on information other than the personal knowledge of the person or persons answering. These interrogatories are intended to be continuing in nature, and the answers should promptly be supplemented or amended as appropriate, should CEC obtain any new or differing information responsive to the interrogatories.

Interrogatories 2 through 15 below are based upon CEC's answers to Interrogatories 1 and 6 (on contentions CEC 5-1 and

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and 5-2) in "California Energy Commission's Responses to First Set of NRC Staff Interrogatories," December 5, 1979.

1. With respect to each of Board Questions CEC 1-2, CEC 1-4, CEC 1-6, CEC 1-7, CEC 1-10 and CEC 5-3a, provide the following information.

A. Identify the individual(s), if any, whom CEC intends to present as witnesses in this proceeding on the subject matter of each of the CEC Board questions. The identification should include the individual's name, affiliation, and a summary of the educational and professional background of that individual.

B. Provide a reasonable description of the substance of the testimony of any witness(es) that CEC intends to have testify with regard to each of the CEC Board questions, including an identification of all documents that will be relied upon in that testimony.

C. Following the substantive response to each of the subsequent interrogatories posed by Licensee, identify all documents and studies relied upon by CEC in providing the answers to that interrogatory. The identification should be specific to the portion of the document or study relied upon. Studies shall include observations, calculations, literature and other types of work, whether recorded in writing or not, which consist of an examination or analysis of a phenomenon.

2. Does CEC contend that the reactor containment structure at Rancho Seco would be unable to accommodate the pressure and/or temperature conditions resulting from a loss of coolant accident?

3. If the answer to the preceding Interrogatory is in the affirmative or not in the negative, would the rate of loss of coolant in the accident or accidents CEC postulates exceed that produced by the double-ended rupture of the largest pipe of the reactor coolant system at Rancho Seco?

4. If the answer to Interrogatory 2 is in the affirmative or not in the negative, describe in detail the sequence or sequences of events which CEC claims would lead to a breach of containment, including, without limitation: a description of the feedwater transient (if any), the maximum temperature and overpressure that would be experienced, the system or systems that would have to fail at the facility in order for the sequence of events to take place, and the rate and total mass, volume and radioactive content of releases from containment into the environment.

5. For each sequence of events described in response to the preceding Interrogatory, does CEC contend that a controlled, filtered venting system is commercially available at the present time that would reduce the rate or total mass,

volume and/or radioactive content of releases from containment into the environment?

6. If the answer to the preceding Interrogatory is in the affirmative, identify each such controlled, filtered venting system by giving the manufacturer or designer, total cost (including, without limitation: developmental, licensing, plant modification, installation and testing, maintenance costs), method of operation, and estimated reduction in the rate or total mass, volume and/or radioactive content of releases from containment.

7. If the answer to Interrogatory 5 is in the affirmative, describe all analyses that have been performed to document the effectiveness of each controlled, filtered venting system, and all testing or operating data that have been used to verify the system's effectiveness.

8. If the answer to Interrogatory 5 is in the affirmative, describe all analyses that have been performed to document the reliability of each controlled, filtered venting system including, without limitation: all analyses of component reliability, system activation at points below the failure pressure and/or temperature of the containment, possible spurious operation of the system, and possible filter bypassing or malfunctioning; and describe all testing or operating data that have been used to verify the system's reliability.

9. If the answer to Interrogatory 5 is in the affirmative, describe all analyses that have been performed to document the safety of each controlled, filtered venting system, including, without limitation: all analyses of possible interference of the system with the emergency core cooling system and other engineered safeguards, flashing of the containment sump water, loss of integrity of containment seals during a prolonged accident, and hydrogen explosion potential; and describe all testing or operating data that have been used to verify the system's safety.

10. If the answer to Interrogatory 5 is not in the affirmative, does CEC contend that a controlled, filtered venting system has been technically developed and demonstrated that would reduce the rate or total mass, volume and/or radioactive content of releases from containment in one or more of the sequences of events enumerated in your response to Interrogatory 4.

11. If the answer to the preceding Interrogatory is in the affirmative, identify each such controlled, filtered venting system by describing its developer, method of operation and estimated reduction in the rate or total mass, volume and/or radioactive content of releases from containment.

12. For each controlled, filtered venting system identified in the preceding Interrogatory, give the estimated date of commercial availability, projected total cost (including,

without limitation developmental, licensing, plant modification, installation and testing and maintenance costs) and identify all analyses or studies that have been performed to demonstrate the feasibility, effectiveness, reliability and/or safety of the system, and all testing or operating data that have been used to verify such analyses or studies.

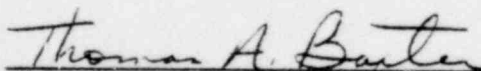
13. For each controlled, filtered venting system identified in response to Interrogatories 6 and 11, state which containment parameters (e.g. containment pressure, temperature, etc.), and what values of those parameters, would result in automatic system activation.

14. For each controlled, filtered venting system identified in response to Interrogatories 6 and 11, describe how any containment matter processed through the system would be disposed of.

15. For each controlled, filtered venting system identified in response to Interrogatories 6 and 11, state whether the system has been designed as a Seismic Category I structure.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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