



NRG PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	§	
	§	
HOUSTON LIGHTING &	§	
POWER COMPANY	§	Docket No. 50-466
	§	
(Allens Creek Nuclear	§	
Generating Station,	§	
Unit 1)	§	

APPLICANT'S RESPONSE TO JOHN F. DOHERTY'S
ADDITIONAL CONTENTIONS

Houston Lighting & Power Company (Applicant) hereby submits the following individual responses to the additional contentions filed by John F. Doherty (Intervenor).
Amendment to Contention 4. ATWS mitigation incorporation.

In its Memorandum and Order of April 11, 1979, the Board allowed Intervenor an opportunity to give with reasonable specificity the bases for his contention that the pending generic resolution of the ATWS issue requires design flexibility. Intervenor now answers that he "interprets NUREG - 0460 V.3 to mean the main ATWS mitigation will be enlargement of the SLCS system." Intervenor's "interpretation" is groundless. There is nothing in any of the three volumes of NUREG-0460 that indicates that the system volume

will be increased to meet the mitigation design criteria. The only changes contemplated, besides those in instrumentation and circuitry, are a change in flowrate (an increase in pump capacity) and some changes in plumbing routing. Intervenor can not genuinely contend that these changes, set out in the document, necessitate additional space for the existing SLCS tanks, or appreciably altered pipe size, or increased weight bearing capacity, or altered reactor vessel penetrations. Intervenor's clarification of bases is no basis at all and, therefore, the contention should be rejected.

Contention 9. IEEE-279 qualification.

Intervenor states that Applicant's safety systems contain many non-safety grade components. Intervenor's only support for this assertion is a reference to PSAR Table 3.10-1. The difficulty with this position is that the referenced table does not speak to the system or component criteria for safety systems. The table is clearly titled "Typical Vendor Supplied Class 1E Devices" and purports to be nothing more than that: a non-specific list of electric and electronic components that are part of the instrument and control panels to be supplied by the NSSS vendor. Figures 7.1-3 through 7.1-8 of the PSAR lists all the safety protection systems for ACNGS and their standard qualifications.

Without exception, these safety systems are comprehensively qualified under IEEE-279-1971 and all other applicable IEEE standards. Intervenor's contention should be rejected as totally without basis.

Contention 10. Diesel generator reliability.

To the extent Intervenor contends that the HPCS diesel generator system is too unreliable to provide a reasonable assurance of safe operation of the plant, Applicant agrees that this contention meets the minimum requirements for presenting a litigable issue.

Contention 11. Spent Fuel Pool LOCA.

Intervenor claims that there is a danger to his health and safety from the following tenuous chain of events. An accident at a "nearby" nuclear plant*/ causes an evacuation of ACNGS, the abandoned spent fuel pool loses water without replenishment resulting in an "evaporation induced criticality event." There is no basis for assuming that each event in this chain is anything but sheer speculation of the most improbable sort.**/ Whatever the possible interpretations of this contention, Intervenor has not provided

*/ There are no nearby nuclear plants. There are no plans for an "ACNGS Unit-2" and the other two stations named by Intervenor are over 60 and 150 miles away, respectively.

**/ In fact, the climax appears to be impossible because loss of water moderator through evaporation would most certainly be a "sub-criticality event."

a single factual statement that would take this sequence out of the conjectural category. Accordingly, it should be dismissed.

Contention 12. Rod Pattern Control System.

Intervenor complains that the rod control system proposed for ACNGS is unreliable as demonstrated by repeated failures at other BWR's. Intervenor is perhaps correct in his survey of past system problems, but is incorrect in ascribing that system to ACNGS. The difficulties described by Intervenor may have plagued the Rod Worth Minimizer system, but are not relevant to the substituted Rod Pattern Control System incorporated in the ACNGS design. Intervenor has presented nothing to question the reliability of the actual system used here and, accordingly, the contention shall be dismissed.

Contention 13. ECCS inlet strainers.

To the extent that Intervenor contends that there is a significant potential for ECCS or containment heat removal system degradation due to plugging of the screens on the suction inlets in the suppression pool, Applicant agrees that this contention meets the minimum requirements for presenting a litigable issue.

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Contention 14. Main Stem Line Radiation Monitor.

To the extent Intervenor claims that the Main Steam Line Radiation Monitor is not sensitive enough to detect a rapid fuel failure, Applicant agrees that this contention meets the minimum requirements for presenting a litigable issue.

Contention 15. WIGLE code.

Intervenor complains that the WIGLE computer code is not conservative in computing the effects of a design base power excursion accident. Applicant does not rely on the WIGLE code to compute the peak energy yield in such an accident. In fact, Applicant has never used the WIGLE code for any purpose. Thus, the contention is irrelevant to ACNGS and should be dismissed.

Contention 16. Steam blanketing of the fuel rods.

Intervenor alleges that Applicant has not considered steam blanketing of the fuel rods as a part of the ECCS performance evaluation. However, Appendix K to 10 CFR Part 50 provides the specific methodology for calculating the peak cladding temperature during ECCS operation including all appropriate heat transfer phenomena. See, e.g., Appendix K Section I.C.4.e. Furthermore, Intervenor has not specifically

challenged Applicant's design and analysis as not being in compliance with the requirements of paragraph 50.46 and Appendix K to 10 CFR Part 50. In sum, Intervenor's cryptic reference to steam blanketing is either a direct challenge to the Commission's ECCS regulations or a nonspecific complaint about Applicant's compliance. In either case, the contention should be dismissed.

Contention 17. Relief valve failure.

To the extent Intervenor contends that Applicant should be required to use a variety of relief valve designs, Applicant agrees that this contention meets the minimum requirements for presenting a litigable issue. This contention is identical to TexPirg Additional Contention 46. If the Board admits these contentions, Intervenor and TexPirg should be consolidated as parties for the presentation of evidence, cross-examination, briefs, proposed findings of fact, and conclusions of law and argument.

Contention 18. Pressure sensors.

Intervenor asserts that the recirculation pump pressure sensors can not be tested during operation and have displayed a marked history of failures. The facts are exactly contrary to what is alleged. Section 7.2.1.1.3.8 of the PSAR demonstrates that all subsystems of the reactor protection system, including the pressure sensing circuitry,

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can be tested during operation. Similarly, Intervenor has not documented, or even alleged, one specific instance where a pressure sensor circuit used in recirculation pump trip has failed.* / Since this contention lacks the slightest factual support, it should be dismissed.

Contention 19. Collet retainer tube cracking.

As Intervenor surmises, Applicant has changed the materials, design, and fabrication of the collet retainer tubes to avoid cracking problems experienced in earlier components. Intervenor further contends, however, that Applicant should prove that this change is "superior to the one currently in use with BWR's . . ." For some unexplained reason, Intervenor believes that the change "will not alter the contended situation." The flaw in this contention (whatever its real nature) is that Intervenor's reasons are not explained - - at all. Nowhere in the contention is there a single specific criticism of the redesign. The statements made amount to no more than a general demand that Applicant justify the design change criteria to Intervenor's satisfaction, whatever that might be. The contention totally

* / Intervenor's reference to a number of "reportable occurrences" involving all types and uses of pressure sensor devices through out the BWR plant certainly does not establish a relevant history as to the reliability of the specific circuitry in question.

fails to meet the specificity requirements of 10 CFR 2.714 and must be dismissed.

Contention 20. BWR-6 gap conductance.

Intervenor contends that Applicant's NSSS vendor has not performed calculations for the BWR-6 to account for the presence of fission product gas in gaps between the fuel pellet and cladding. The simple answer is that General Electric's GEGAP-III gap conductance modeling has been applied to all BWR designs, which is imminently reasonable since all BWRs have the same pertinent fuel rod design input parameters. The general applicability of the gap conductance calculations to all BWR designs has been accepted by the Staff*/ and Intervenor does not allege a shred of support for the erroneous conclusion that these calculations do not apply to the BWR-6. The contention must be dismissed for failure to raise a genuine factual controversy.

Contention 21. Void collapse reactivity.

This contention implies that Applicant is postponing "resolution" of some void collapse reactivity issue

*/ "Supplement No. 1 To Technical Report on Densification of General Electric Reactor Fuel," December 14, 1973.

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until the operating license stage. The alleged problems associated with this "postponement" is indeed a puzzle since it fails to specify what "issue" Intervenor asserts is yet unresolved, and the contention affords no clues. Perhaps Intervenor is unaware that void collapse reactivity has already been calculated and included in every required analysis of normal operating and transient conditions, and nothing has been deferred to the OL stage. See, PSAR Section 4.3. and Chapter 15. The contention must be dismissed as vague and unsupported. To the extent Intervenor raises an issue effecting his economic interest, it must be disregarded for the reasons given in the response to Contention 34.

Contention 22. Control rod blade cracking.

Intervenor does not raise an environmental issue but argues that neutron flux induced cracking might result in boron carbide poison loss, which in turn might result in a loss of shutdown margin. Based on this scenerio of compound speculation Intervenor then alleges an impact on Intervenor's "economic interest" if the plant is not allowed to operate while this hypothetical problem is corrected. The contention is wholly speculative and unsupported; but, more importantly, also urges consideration on economic interest alone which do not come within the zone of interests protected by the

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Atomic Energy Act or NEPA. Consumers Power Company (Midland Plant, Units 1 and 2), ALAB - 458, 7 NRC 155, 161-63 (1978).

Contention 23. Overheating pressure surge LOCA.

Intervenor postulates in very broad fashion a loss of coolant accident presumably more severe than the design basis LOCA. The exact initiating events and probable consequences Intervenor leaves to the imagination. The contention is in reality either a challenge to regulations governing potential loss of coolant accidents (10 CFR Part 50, Appendix K) or a request to consider a Class 9 accident without any factual "showing that with respect to the reactor in question, there is a reasonable possibility of the occurrence of a particular type of accident generically regarded as being in Class 9. Long Island Lighting Co. (Shoreham Nuclear Power Station), 6 AEC 831, 836 (1973). Pursuant to Commission guidance, Class 9 accidents need not be considered unless such a particularized showing is made.

Contention 24. Dropped rod reactivity worth.

Although his argument is far from clear, apparently Intervenor claims that if a rod of reactivity worth in excess of 1.4% is dropped, the specific enthalpy limit of 280 calories per gram will be exceeded. Intervenor's support for this conclusion is a General Electric topical report. NEDO-10527 does not demonstrate anything close to

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what is claimed; but putting aside Intervenor's interpretation and even assuming that Intervenor's relationship is correct, the contention is empty if the rod worth which could be dropped is less than the imaginary 1.4% limit. This is exactly the case. The envelope of maximum worth controls rods never exceeds 1.1%. See PS:R SECTION 15.1.38.1 and Figures 4.3-2a : 2b. Simply stated, Intervenor has not disputed the design and analysis which places this conservative limit on the rod drop accident. Since Intervenor has provided no basis for this contention, it should be dismissed.

Contention 25. Flow blockage.

To the extent Intervenor contends that the design basis flow blockage accident should assume more than one blocked fuel assembly, Applicant agrees that this contention meets the minimum requirements for presenting a litigable issue.

Contention 26. Reactor stud bolt visual inspection.

Intervenor requests that the reactor stud bolts be visually inspected at refueling. It appears obvious that one can not avoid visually inspecting the stud bolts when unfastening them prior to removing the vessel head. Nevertheless, under the liberal standard of the Commission's regulations,

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Applicant agrees that this contention meets the minimum requirements for presenting a litigable issue.

Contention 27. Reactor pedestal concrete.

Intervenor alleges that the pedestal concrete may be weakened by excessive temperatures or temperature gradients. There are two answers to Intervenor's concern. The first, and dispositive one, is that the reactor vessel pedestal concrete is not a load bearing member.*/ PSAR Section 3.8.3.1.7. Secondly, even after reforming the contention to correct the conceptual error, Intervenor has not alleged a particularized defect in Applicant's thermal and loading qualification of the pedestal structural steel. See PSAR Section 3.8.3.3.2. This contention should be rejected for lack of basis and because it is unacceptably nonspecific.

Contention 28. Control rod ejection.

Intervenor claims that the control rod rejection accident has not been considered adequately because containment and Scram Discharge Volume Tank (SDVT) pressures have not been added to the ejection forces. Both of Intervenor's additive forces are irrelevant. It is impossible for the control rod drives to be ejected by containment pressure

*/ Concrete is filled between the two concentric steel cylinders of the pedestal only for seismic mass effects.

since the CRDMS are physically arranged such that the force from containment pressure is vectored into the vessel, not out. See, PSAR Sections 6.2.1.2.3. and 6.2.1.2.4. The SDVT can be pressurized only after a scram when the rod ejection accident is inconsequential because the post-scram reactor remains subcritical with the control rod of highest worth out of the core. See, PSAR Section 4.2.3.2.2.3. Intervenor's contention makes no technical sense, is without basis, and should be dismissed.

Contention 29. Ultimate heat sink.

This contention has two parts. First is an allegation that the ultimate heat sink has been "unexplainably" reduced to insufficient size. The total amount of ultimate heat sink water available was reduced appropriately with the reduction in station size from two units to one unit; but, of course, remains at an amount more than adequate to ensure four months supply for LOCA cooling. PSAR Section 9.2.5.3.1.4.2. Furthermore, Intervenor does not specify one allegation that supports his claim of "insufficiencies." Any implication that the Staff concurs in his assertion of inadequate size is misleading. In Supplement No. 2. to the SER, Staff clearly determined that "the ultimate heat sink will have the capability to provide sufficient cooling for safe control

of an accident and to maintain the plant in a safe shutdown condition . . ." (p. 9-2). Intervenor's inadequate size allegation should be dismissed as lacking specificity and basis, and being merely conclusional.

In a separate allegation, Intervenor repeats the Staff's one concern that "there is insufficient assurance that postulated failures would not lead to unacceptable blockage of the submerged intake canal . . ." Applicant accepts this contention as meeting the minimum requirements for framing a litigable issue, although it is unrelated to the size of the ultimate heat sink about which the balance of the contention is concerned.

Contention 30. Offsite power.

In Contention 30, Intervenor challenges the adequacy of the offsite and onsite supplies, contending that

"his health, safety and economic interests are imperiled because Applicant refused to interconnect with any utility that interconnects with an out of state utility. This refusal makes ACNGS safety systems more vulnerable to lack of power in the event there is loss of off-site power during severe climatic conditions or other disturbances, and the proposed unit must turn on on-site diesel generators which are not highly reliable, and unpreferred to the use of off-site power."

The Contention takes issue with the Commission's governing regulation. It also lacks specificity and is wholly without basis. It should be rejected.

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Criterion 17 of the General Design Criteria (GDC-17) contained in Appendix A to 10 CFR Part 50, prescribes requirements for electric power systems. It requires that

"An onsite electric power system and an offsite electric power system shall be provided to permit functioning of structures, systems, and components important to safety."

GDC-17 requires that, assuming the offsite power is not functioning, the onsite system shall provide sufficient capacity and capability to assure that fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded and that "the core is cooled and containment integrity and other vital functions are maintained in the event of postulated accidents.."

So far as offsite power is concerned, GDC-17 requires that:

"Electric power from the transmission network to the onsite electric distribution system shall be supplied by two physically independent circuits (not necessarily on separate rights of way) designed and located so as to minimize to the extent practical the likelihood of their simultaneous failure under operating and postulated accident and environmental conditions. A switchyard common to both circuits is acceptable. Each of these circuits shall be designed to be available in sufficient time following a loss of all onsite alternating current power supplies and other offsite electric power circuit, to assure that specified acceptable fuel design limits and design conditions of the reactor coolant pressure boundary are not exceeded. One of these circuits shall be designed to be available within a few seconds following a loss-of-coolant accident to assure

that core cooling, containment integrity, and other vital safety functions are maintained."

Intervenor does not allege that the offsite power supply for the ACNGS Nuclear Generating Station will fail to comply with GDC-17 with respect to any of these detailed requirements. Although he makes reference to alleged unreliability of onsite diesel generators, the contention also fails to specify how the ACNGS will fail in any way to meet the GDC-17 requirements concerning onsite power. Accordingly, the proposed imposition of the requirement of an interstate connection (or the alternatives of additional generators or shutdown when undefined "severe" climatic conditions occur) is no more than an impermissible challenge to the Commission's regulations under 10 CFR § 2.758(a).

Even if the contention was not foreclosed by GDC-17, the contention would be insufficient, for it is wholly unspecific and lacking in basis. It fails to indicate in what respect the absence of an interstate connection makes the offsite system "more vulnerable"; and it does not indicate against what standard the system should be measured to determine that it is "more" vulnerable or the extent of the alleged increase in vulnerability. The contention does refer to turbine trips at other plants caused by climatic conditions, but does not suggest that these are not "postulated

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accidents and environmental conditions" against which the system is designed in accordance with GDC-17, as is indeed the case. See PSAR Section 8.2.2. And the suggestion that the system "may become too highly centered around ACNGS . . ." is by its terms merely speculation.

In sum, the entire contention is merely conjecture which fails to raise an issue suitable for litigation.*/

Contention 31. Flow induced vibration.

Intervenor raises the alleged problem of flow induced vibration effects on in-core instrumentation. This contention is subsumed in TexPirg Contention 11 and these parties should be consolidated on this issue.

*/ It may be of interest to the Licensing Board to know that the question of interstate connection was recently the subject of a seven-week trial in the United States District Court for the Northern District of Texas. After considering "over 3,500 pages of testimony and about 1,000 exhibits", the Court issued a lengthy memorandum opinion upholding intrastate operation. West Texas Utilities Company and Central Power and Light Company v. Texas Electric Service Company and Houston Lighting & Power Company, (N.D. Tex., January 30, 1979; No. CA3-76-0633-F). The trial and the decision dealt primarily with the "economic interests," referred to in the contention, i.e., issues under the Sherman antitrust Act, the Federal Power Act and the Public Utilities Holding Company Act. These "economic interests" are, of course, not subject to consideration in this proceeding. However, the decision also stated that "the plaintiffs have not established that the [interstate] interconnection . . . would be as reliable as the current intrastate operation, or even a reliable network." Slip op. p. 49.

Contentions 32. LOCA vaporization rate.

To the extent Intervenor contends that the Two Loop Test Apparatus tests have produced data on the rate of vaporization of emergency core cooling water which may require changes in the General Electric model in order to assure adequate margins for assessing the performance of the ACNGS ECCS, Applicant agrees that this contention meets the minimum requirements for presenting a litigable issue.

Contention 33. Doppler reactivity feedback.

Intervenor asserts that General Electric relies on data generated with respect to metallic uranium fuel instead of uranium dioxide fuel for predicting doppler reactivity feedback. This incorrect assumption gives rise to a number of postulated inadequacies in analysis and design. Intervenor's fears would have been allayed if he had availed himself of the opportunity extended by Applicant, at Intervenor's request,*/ to inspect the GE report titled "Generation of Void and Doppler Reactivity Feedback For Application to BWR Design," NEGO-20964 (December 1975). This topical report supplies the uranium dioxide reference Intervenor claims is lacking. This contention must be dismissed as it lacks a proper basis.

*/ "John F. Doherty's First Request for Documents To Houston Lighting and Company" dated April 5, 1979.

Contention 34.

Intervenor claims that his "economic interest" will be injured because the General Electric division making the nuclear steam supply system for ACNGS "will be going out of business." This contention should be rejected for two reasons. First, the contention is based on nothing but pure speculation on Intervenor's part; he fails to provide any basis, other than sheer conjecture, to support the assertion that GE will leave the NSSS business. Second, Intervenor's claim that his "economic interest" will be injured, presumably through increased electric rates caused by such items as plant outages, must be rejected since economic interests do not come within the zone of interests protected by the Atomic Energy Act or NEPA. Board's February 9 Order, pp. 17-18 and cases cited therein.

Contention 35

Intervenor claims that safe welding cannot be provided at ACNGS because a shortage of trained welders "is likely" to occur. This contention should be dismissed since, as Intervenor readily admits, it is based entirely on what "is likely" to happen at ACNGS and therefore is nothing more than sheer speculation on Intervenor's part. Moreover, Intervenor does not take issue with Applicant's commitment

in Appendix C1.71-1 of the PSAR to comply with NRC criteria with respect to training required for welders at ACNGS. Rather, Intervenor seeks relief in the form of requiring some unspecified and vague training program as well as requiring a union "pay scale" for welders at ACNGS; he has provided no supporting basis for such relief, particularly the latter which is beyond the power of this Board to grant and therefore the contention should be rejected.

Contention 36. Drywell vacuum breaker.

Intervenor hypothesizes a containment overpressurization sequence initiated by the "pressure outside the drywell decreasing to less than the drywell pressure opening the vacuum breaker valves." It is physically impossible for Intervenor's imagined sequence to materialize. The drywell vacuum breaker system is designed to minimize the pressure transient on a sudden depressurization of the drywell due to condensation of steam following a LOCA. To accomplish this, the vacuum breaker check valves open when the drywell pressure is lower than the pressure inside the containment. The drywell vacuum breaker can not operate if the drywell is at a higher pressure than containment, as Intervenor supposes. No one can seriously suggest that check valves will open backwards. The contention is wholly based on mechanical

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impossibilities; hence, it has no basis and should be accordingly disregarded.

Contention 37. ECCS heat transfer.

Intervenor alleges that Applicant's ECCS performance calculations do not account for the heat transfer from the reactor vessel walls. Applicant's evaluation model does in fact include the heat transferred from piping, vessel walls, and all nonfuel internal hardware as required by Appendix K to 10 CFR Part 50, Section I.A.6. Applicant has strictly complied the Commission's ECCS regulations; Intervenor has not alleged any shortcomings in Applicant's compliance or with the regulations. Hence, this portion of the contention should be dismissed as unsupported.

Intervenor's further claim that large scale testing is needed to confirm the acceptable heat transfer features of the ECCS evaluation models is a direct challenge to the Commission's regulations. Since Intervenor has done nothing more than make a general complaint about "underestimation" in the present regulations without a showing of "special circumstances," this contention can not be addressed in this proceeding. See, Ohio Edison Co. (Erie Nuclear Plant, Units 1 and 2) ASLB Order Subsequent to the First Prehearing Conference Slip op. p. 7 (August 18, 1977).

Intervenor's contention may also be interpreted as urging a generic consideration of the ECCS rule in light of new knowledge and operating experience (e.g., NUREG/CR-0599). If such is the case, the contention is still inappropriate for these proceedings because the Commission has initiated its own generic consideration of the ECCS rule. See 43 Fed. Reg. 57157 (December 6, 1978) wherein the Commission invited comment preliminary to a rulemaking on changes reflecting heat transfer to the coolant from hot walls, countercurrent flow, core spray distribution and all other significant phenomena.

Contention 38.

To the extent Intervenor contends that the Residual Heat Removal System does not meet the Commission's

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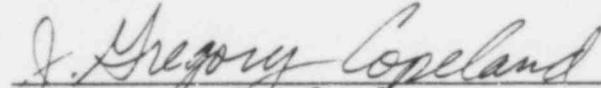
single failure criterion, Applicant agrees that this contention meets the minimum requirements for presenting a litigable issue.

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to John F. Doherty's Additional Contentions in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 14th day of June, 1979.

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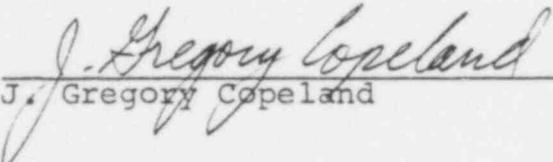
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