

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
COMMONWEALTH EDISON COMPANY) Docket Nos. 50-295
(Zion Station, Units 1 and 2)) 50-304

TESTIMONY OF GARY G. ZECH
ON CONTENTION 2(a) and (b)

I am employed by the U. S. Nuclear Regulatory Commission as a Project Manager, in the Division of Operating Reactors, Office of Nuclear Reactor Regulation. I am the project manager assigned to the Zion Station spent fuel pool modification application.

The Staff performed an environmental evaluation of the proposed modification pursuant to the National Environmental Policy Act of 1969, as amended, (NEPA). This culminated in the issuance of an environmental impact appraisal (EIA) on March 29, 1979. The EIA was prepared under my direction and supervision. Its contents are true and correct to the best of my knowledge and I adopt it as the NRC Staff's direct testimony in this proceeding regarding Contention 2(a) and (b).

Contention 2(a) states:

The State of Illinois contends that approval of the proposed license amendment would be a major action of the Commission significantly affecting the quality of the human environment in Illinois. The National Environmental Policy Act of 1969, as amended, requires the Commission to submit an environmental impact statement with respect to the proposed license amendment.

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NEPA requires the preparation of an environmental impact statement in connection with "major Federal actions significantly affecting the quality of the human environment." 42 U.S.C. §4332(2)(c). The Commission's regulations implementing NEPA are contained in 10 CFR Part 51.

Based on the review documented in sections 5 and 6 of the EIA, the Staff concluded that the environmental impacts of the proposed action are negligible. EIA, §7.7. Under the circumstances, the Staff concluded that the issuance of a negative declaration was appropriate under 10 CFR §51.5(c) and that an environmental impact statement need not be prepared. EIA, §10.0.

Contention 2(b) states:

Approval of the amendment request would be contrary to the NRC policy position on spent fuel storage which prohibits non-emergency licensing of any existing storage facility prior to the adoption of an official long term policy regarding the permanent storage of spent fuel. See "Intent to Prepare Generic Environmental Impact Statement of Handling and Storage of Spent Light Water Power Reactor Fuel," 40 F.R. 42801, September 16, 1975.

(1) There is no emergency need to rerack as the existing storage pool contains more space than is necessary to accommodate full core discharge.

(2) The existing pool is able to accommodate normal refueling discharges until 1981; therefore, failure to grant the application at this time poses no threat of imminent shutdown of the facility.

If the storage capacity of the spent fuel pool is not increased or if alternative storage space for the spent fuel from the Zion Station is not located, both Zion units will have to be shut down in 1983. Full core reserve capacity will be lost following the 1981 refuelings. Shutdown of the Zion Station could adversely

affect the licensee's ability to meet electrical energy needs. See EIA, §8.4
The Staff estimated that the cost of replacement energy would be \$7.2 million
per month. See EIA, §8.4. On balance, the Staff concluded that deferral of
the proposed action was n : in the public interest. See EIA, §8.4.

GARY G. ZECH

PROFESSIONAL QUALIFICATIONS

DIVISION OF OPERATING REACTORS

OFFICE OF NUCLEAR REACTOR REGULATION

U.S. NUCLEAR REGULATORY COMMISSION

I am a project manager in the Division of Operating Reactors, Office of Nuclear Reactor Regulation, U.S. Nuclear Regulatory Commission. As such, I am responsible for managing and participating in the safety and environmental reviews associated with licensing actions regarding the design and operation of assigned operating power reactors. This includes planning and coordinating the efforts of other Commission personnel involved in the reviews.

I received a Bachelor of Science degree from the U.S. Naval Academy in 1964. Upon graduation, I attended the Navy's Submarine School and entered the Navy Nuclear Power Program. I attended a 6-month course in nuclear engineering followed by a 7 month training period at the Navy's prototype nuclear power plant (S3G) at West Milton, N.Y. From 1966 to 1973 I served in various engineering assignments on diesel and nuclear powered submarines including the mechanical, electrical and radiological controls areas.

In July 1973, I joined the General Atomic Company of San Diego, California as a Senior Operations Engineer at the Fort St. Vrain High Temperature Gas Cooled Reactor Plant in Colorado. I was responsible for coordinating the construction work and startup test program efforts with the utility, Public Service Company of Colorado.

In August 1974, I joined Stone & Webster Engineering, Corporation of Boston, Massachusetts as a Project Engineer. I was responsible for the system design specifications for Emergency Core Cooling Systems on the Montague 1 and 2 Nuclear Generating Station Project and developed a qualification program for startup test engineers consisted with the ANSI Standard N18.7.

I am a Registered Engineer-In-Training in the Commonwealth of Massachusetts.

I have held my position with the Commission since June 1975.