

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

APPLICANT'S RESPONSE  
TO JOHN F. DOHERTY'S THIRD\* SET OF  
INTERROGATORIES TO HL&P

In response to the interrogatories propounded by John F. Doherty, Houston Lighting & Power (Applicant) answers as follows:

INTERROGATORY NO. 1: As designed, can two more charcoal filters be installed in the radwaste building of ACNGS?

ANSWER: Applicant objects to this interrogatory on the grounds that the question is nonsensical. There are no charcoal filters in the radwaste building, so that a reference to "two more" makes no sense. There is nothing in this interrogatory, or any other, to aid in identifying the relevant system or contention inquired about; therefore, Applicant cannot meaningfully respond.

INTERROGATORY NO. 2: If the answer to No. 1 (above) is "no" state the reasons such devices cannot be installed.

\*This document was incorrectly titled "JOHN DOHERTY'S SECOND SET OF INTERROGATORIES TO H.L.&P."

The "device" in this question is called a "charcoal delay bed" in Figure 11-2 of the Supplement No. 2 to the SER.

ANSWER: Applicant objects to this interrogatory on the grounds given in the answer to Interrogatory No. 1.

INTERROGATORY NO. 3: Has Applicant modified the off-gas system in the following way since the SER and Supplement No. 2 to the SER?

- a. Replacing the liquid loop seals in the off-gas process lines with traps which do not rely on a head of water to provide the seals?
- b. The addition of a "guard bed"?
- c. The addition of any additional "charcoal delay beds"?

ANSWER: a. The applicant has never had loop seals in the off-gas process lines.  
b. There has been no addition of a "guard bed" to the off-gas system.  
c. There have been no additional "charcoal delay beds" added to the off-gas system.

INTERROGATORY NO. 4: Please state where in the ACNGS the location of the bottled nitrogen to be used on an automatic depressurization system air supply (mentioned on

Page 5-9, first full paragraph) will be.

ANSWER: The ADS nitrogen gas bottles are located on elevation 142.50' of the Reactor Auxiliary Building.

Respectfully submitted,

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ATTORNEYS FOR APPLICANT  
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STATE OF TEXAS

§

COUNTY OF HARRIS

§

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared, who upon his oath stated that he answered the foregoing Houston Lighting & Power Company's Response to John F. Doherty's Third Set of Interrogatories to Houston Lighting & Power Company in his capacity as Supervising Engineer for Houston Lighting & Power Company, and all statements contained therein are true and correct to the best of his knowledge and belief.

*Jon G. White*  
\_\_\_\_\_  
Jon G. White

SUBSCRIBED AND SWORN TO BEFORE ME by the said Jon G. White, on this 25<sup>th</sup> day of June, 1979.

*Susan Powers*  
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Notary Public in and for  
Harris County, T e x a s

SUSAN POWERS  
Notary Public in Harris County, Texas  
My Commission Expires May 20, 1981

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