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UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:

S
HOUSTON LIGHTING & POWER
COMPANY

(Allens Creek Nuclear Generating Station, Unit 1)

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Docket No. 50-466

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."

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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 he SER and Supplement No. 2 to the SER?
 - a. Replacing the liquid loop seals in the offgas 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.

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

Respectfully submitted,

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ATTORNEYS FOR APPLICANT HOUSTON LIGHTING & POWER COMPANY

STATE OF TEXAS

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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 & White

SUBSCRIBED AND SWORN TO BEFORE ME by the said Jon G. White, on this 25 day of Verse, 1979.

> Stewar Travers Notary Public in and for Harris County, T e x a s

> > SUSAN FOWERS

Notary ublic in Harris County, Texas My Commission Expires 114 20 1981

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to John F. Doherty's Third Set of Interrogatories to HL&P in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 25 day of 1979.

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