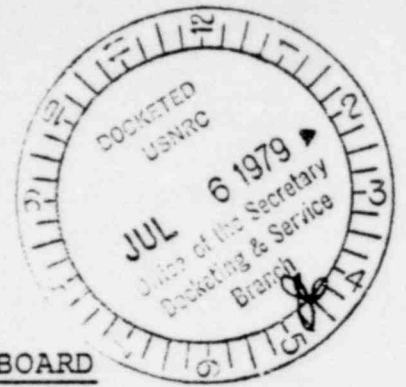


RELATED CORRESPONDENCE



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)	§	

SECOND SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION
OF DOCUMENTS FROM HOUSTON LIGHTING
& POWER COMPANY TO BRENDA A. MC CORKLE

Pursuant to Section 2.7406 and 2.741 of the Commission's Rules of Practice, Houston Lighting & Power Company (Applicant) propounds this Second Set of Interrogatories and Request for Production of Documents to Brenda A. McCorkle (Intervenor).

I.

Instructions

1. Each interrogatory must be answered separately and fully in writing under oath or affirmation by the person or persons making them within 14 days from the date of service, and each document requested must be produced no later than 30 days after service of these Interrogatories and Requests for Production.

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2. As used herein the singular form of a noun or pronoun shall be considered to include within its meaning the plural form of the noun or pronoun so used, and vice versa; in similar fashion, the use of the masculine form of a pronoun shall be considered to also include within its meaning the feminine form of the pronoun so used, and vice versa; and in a similar fashion, the use of tense of any verb shall be considered to also include within its meaning all other tenses of the verb so used.

3. These Interrogatories shall be deemed continuing, so as to require additional answers if after answering such Interrogatories Intervenor obtains information upon the basis of which she knows a response was incorrect when made, or she knows that the response though correct when made is no longer true and the circumstances are such that a failure to amend the response is in substance a knowing concealment.

4. In your answer, repeat each Interrogatory set forth herein and then set forth the answer thereto separately and fully. As to any Interrogatory, section or sub-section of said Interrogatory that you refuse to answer for any reason, separately state the grounds for any such refusal. Where a complete answer to a particular Interrogatory, section or sub-section of said Interrogatory is not possible, such Interrogatory, section or sub-section of said

Interrogatory should be answered to the extent possible and a statement made indicating the reason for the partial answer.

5. If any response is withheld, in whole or in part, for any reason, including but not limited to any claim of privilege, confidentiality or trade secret, set forth the basis upon which such response is withheld, and include in such explanation a statement of what is being withheld, the whereabouts of all documents referring expressly to whatever response is being withheld, and the identify of all persons who have seen any documents being withheld or have knowledge of the matters being withheld.

II.

Definitions

The following definitions and instructions shall apply to these Interrogatories:

1. The words "identify," "identity" or "identification" when used in reference to a natural person means to state his full name and present or last known address, his present or last known position in business affiliation, and each of his positions during the relevant period; when used in reference to a business entity, means to state the name, address and any account or computer number to which such entity is referred to in your records; when used in reference to a document, means to state the type of document (i.e., letter, memorandum,

chart, sound production, report, computer input or output, etc.), the location where it is maintained, all identifying marks and codes, the addressee, the document date, author, and persons to whom copies were sent or persons initiating or reading or approving the document and the name of each of the present custodians of the document. If any such document was, but is no longer in your possession or subject to your control, or in existence, state whether it is (1) missing or lost, (2) has been destroyed, (3) has been transferred, voluntarily or involuntarily, to others, or (4) otherwise disposed of, and in each instance, explain the circumstances surrounding an authorization for disposition thereof and state the date or approximate date thereof.

2. The terms "document" or "documentation" mean and include every writing or record of any type and description that is in your possession, control or custody of your attorney's possession, control or custody as of the date of filing your answers to these Interrogatories, including, but not limited to, correspondence, memoranda, stenographic or handwritten notes, drafts, studies, publications, invoices, ledgers, journals, books, records, accounts, pamphlets, voice recordings, reports, surveys, statistical compilations, work papers, data processing cards, computer tapes or print outs, or any other writing or recording of any kind. The

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term "document" also includes every copy of a writing or record where such copy contains any commentary or notation of any kind that does not appear on the original or on any other copy. Without limitation of the term "control," a document is deemed to be within your control if you have ownership, possession, or custody of the document or a copy thereof, or the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

3. "Studies" means all analyses of every type, including but not limited to evaluations, reports, research, examinations, abstracts, criticisms, calculations, tabulations, compilations, compendiums, surveys, books, essays, monographs, and all other investigations, published or unpublished.

4. "Relating to" means relating to in any way and includes the documents which are the subject of the request (e.g. "relating to a study" includes the study itself). Requests concerning a study or basis should be understood to include all input considered and all possible outcomes with respect to such study or basis. For example, requests for documents relating to engineering studies would include all data compiled but not used and all results considered but rejected.

III.

Interrogatories

A. McCorkle Contention 9

1. McCorkle Contention 9 states that "[n]o plan has been developed to protect the plant operators from the danger of poisoning from gases such as chlorine. . . ."

- a. State why the protection provisions described in PSAR Sections 6.4 and 9.4, including chlorine detectors, automatic isolation, control room leak tightness and self-contained breathing apparatus does not provide adequate protection against chlorine poisoning.
- b. What provisions, in addition to those described in PSAR Sections 6.4 and 9.4, must be added in order to constitute an acceptable "plan"?
- c. At page 6-14 of Supplement No. 2 to the Safety Evaluation Report (hereinafter "SER Supp. 2") the NRC Staff concluded that the plant's toxic gas protection is acceptable. State each fact which to your knowledge demonstrates that this conclusion is in error.
- d. Specify the facts upon which you rely in proving that Applicant's toxic gas protection design is not in compliance with Regulatory Guide 1.95. State which provisions of Regulatory Guide 1.95

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are not being complied with, and every reason, with every fact supporting these reasons, why you believe that the pertinent design is in noncompliance.

- 2a. Which toxic gases other than chlorine should the control room atmosphere be protected against?
- b. State how you determined that such gases, if any could be present at the control room air intakes.

B. McCorkle Contention 14

1. This contention states that the fuel rods are not safe because of . . . hydriding"

- a. Define hydriding and explain how it causes clad failures and higher off-gas activities.
- b. What is the source of hydrogenous impurities that you contend will cause hydriding.
- c. What engineering specifications on hydrogenous impurities do you contend are necessary to prevent hydriding?
- d. Is the hydrogen getter material placed in all fuel rods ineffective? If so, state every reason, and every fact supporting these reasons, why the hydrogen getter does not prevent hydriding.

2. This contention also states that the fuel rods are not safe because of . . . fuel densification"

- a. Define fuel densification and explain how it will increase in power spikes and heat generation rate.

- b. What changes in linear heat generation rate caused by densification will render the fuel rods "not safe"? State in answering this question what alteration in linear heat generation rate you expect over the lifetime of a fuel rod and how this alteration will affect fuel rod integrity.
- c. What changes in the probability of local power spikes caused by densification will render the fuel rods "not safe"? State in answering this question what increase in anticipated localized spikes you expect and how this increase will affect fuel rod integrity.
- d. State whether densification will have other effects on fuel rod thermal and mechanical performance. Identify each of these effects and state every reason, and every fact supporting these reasons, why these effects will impact fuel rod safety.

C. McCorkle Contention 17

1. This contention states that "[t]he containment as designed will allow excessive leakage to bypass the filtration systems"

- a. What technical specification on bypass leakage is necessary to prevent "excessive" leakage?
- b. What criteria should be used to judge whether containment leakage is "excessive"? State in detail each quantitative or qualitative criterion used in your assessment.
- c. Will unfiltered leakage of 20% of the total containment leakage cause the total post accident offsite doses to exceed 10 CFR 100 guidelines? Will 10% unfiltered leakage exceed the guidelines? 5%? If the answer to any or all of these is yes, state every reason, and every fact supporting these reasons, why this amount of unfiltered leakage will exceed the Part 100 guidelines.

2. This contention also states that "the filter absorber [sic] may start a fire by auto-ignition, yet there is no water spray to prevent such auto-ignition as required by NRC regulation [sic] Guide 1.52."

- a. What is the source of heat which will cause adsorber auto-ignition?
- b. What temperature limit will safely maintain the adsorber material below the auto-ignition point?

- c. Are water sprays the only cooling system acceptable under the guidance provided in Regulatory Guide 1.52? If so, specifically identify that portion of Regulatory Guide 1.52 which so indicates.

D. McCorkle Contention 2

1. On page 20 of your March 21st deposition you identify the Final Supplement to the Final Environmental Statement (FSFES) as the only source of documentation on algae growth in the cooling lake.

- a. Identify the section number(s) and page(s) which you assert support your contention on algae growth.

- b. Is the FSFES still your only document? If not, identify all others.

2. On page 30 of the March 21st deposition you stated that you had no studies or documents that supported your belief that "the accumulation of heavy metals would become much more concentrated in the fish in the cooling lake." Have you subsequently acquired any such studies or documents? If so, identify all of them.

E. McCorkle Contention 10

1. On page 73 of the March 21st deposition you stated that the Chamber of Commerce brought up the idea of building a large airport just like Intercontinental but on the west side.

- a. To your knowledge, has the Houston Chamber of Commerce formally or informally proposed such an airport?
- b. Has this airport received any official approval? By what governmental entity?
- c. Identify the exact location of this new airport and provide the name of the owner, the exact type of airport proposed (largest aircraft served, estimated number of general aviation and commercial flights per day expected, etc.) and the current status of plans for the airport.

2. Identify the facts, data and circumstances used to evaluate aircraft hazards in the SER and SER Supp. 2 which you contend are in error. State every reason, and every fact supporting these reasons why the actual facts and circumstances are different from those identified by the SER and supplement.

3. Identify the ads in the newspapers which support your contention that there's been an increase in the number of commercial flights over the ACNGS site. Produce copies of any such ads which are in your possession.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Second Set of Interrogatories and Requests for Production of Documents from Houston Lighting & Power Company to Brenda A. McCorkle in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 2nd day of July, 1979.

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