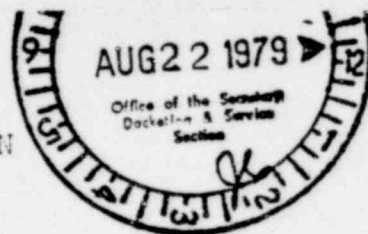


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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



In the Matter of: )

SACRAMENTO MUNICIPAL UTILITY DISTRICT )

Docket No. 50-312

Rancho Seco Nuclear Generating Station )

CONTENTIONS OF PETITIONERS  
GARY HURSH AND RICHARD CASTRO

1. Rancho Seco, being a Babcock and Wilcox designed reactor, is unusually sensitive to off-normal transient conditions originating in the secondary system, and therefore it is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

2. Rancho Seco, being a Babcock and Wilcox designed reactor, is designed with a steam generator which operates with relatively small liquid volume in the secondary side and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

3. Rancho Seco, being a Babcock and Wilcox designed reactor, has a lack of direct initiation of reactor trip upon the occurrence of off-normal conditions in the feedwater system, and therefore is unsafe and endangers the health and safety of Petitioner, constituents of Petitioners and the public.

4. Rancho Seco, being a Babcock and Wilcox designed reactor, has a reliance on integrated control system to automatically regulate feedwater flow, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

5. Rancho Seco, being a Babcock and Wilcox designed reactor, has an actuation before reactor trip of a pilot operated relief valve on the primary system pressurizer which, if the valve sticks open, can

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aggravate an accident, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

6. Rancho Seco, being a Babcock and Wilcox designed reactor, has a low steam generator elevation, relative to the reactor vessel, which provides a smaller driving head for natural circulation, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

7. Rancho Seco, being a Babcock and Wilcox designed reactor, has insufficient timeliness and reliability of the emergency feed-water system, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

8. Rancho Seco, being a Babcock and Wilcox designed reactor, does not have operating procedures for initiating and controlling the emergency feedwater system independent of the integrated control system control, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

9. Rancho Seco, being a Babcock and Wilcox designed reactor, has not installed adequate hard-wire control grade reactor trip on loss of main feedwater and/or on turbine trip, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

10. Rancho Seco, being a Babcock and Wilcox designed reactor, has not completed an adequate analysis for potential small breaks in a loss of coolant accident nor developed and implemented operating instructions to define operator action in such event, and therefore is unsafe and endangers the health and safety of Petitioners,

constituents of Petitioners and the public.

11. SMUD, the licensee, has not upgraded emergency plans to satisfy Regulatory Guide 1.101 with special attention to action level criteria based on plant perimeters, and therefor Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

12. SMUD, the licensee, has not established an emergency operation center for federal, state and local officials and designed a location and an alternate location and provided communications to the plant, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents and the public.

13. SMUD, the licensee, has not sufficiently upgraded off-site radiation monitoring capability, including additional thermoluminescent dosimeters or the equivalent, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioner, constituents of Petitioners and the public.

14. SMUD, the licensee, has not assessed the relationship of state/local plans to the licensee plans so as to assure the capability to take emergency actions, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

15. SMUD, the licensee, has inadequate waste management capabilities, including storage and processing for solid, liquid and gaseous wastes in the event of a loss of feedwater transient, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

16. SMUD, the licensee, has done insufficient analysis of the failure mode and effects analysis of the integrated control system,

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and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

17. SMUD, the licensee, has not modified emergency plans to address changing capabilities of plant instrumentation, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

18. SMUD, the licensee, has not extended the capability to take appropriate emergency actions for the population around the plant site to a distance of ten miles, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents and the public.

19. SMUD, the licensee, has not developed and implemented adequate evacuation plans and procedures which would be necessary in the event of an accident caused by a loss of feedwater transient, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

20. Rancho Seco, being a Babcock and Wilcox designed reactor, does not have a hydrogen recombiner which may be necessary in the event of an accident caused by a loss of feedwater transient, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

21. Rancho Seco, being a Babcock and Wilcox designed reactor, has a pressurizer tank and quench tank which are of inadequate size to accommodate the volume of gas or liquid that may be required to be stored in the event of a loss of feedwater transient, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

22. Rancho Seco, being a Babcock and Wilcox designed reactor,

does not provide control room operators with sufficient data on the water level in the pressurizer and vessel because the operators must interpret information on temperature and pressure in the primary loop and extrapolate water level, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

23. SMUD, the licensee, has inadequate notification procedures for informing local authorities in the event of a loss of feedwater transient, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

24. Rancho Seco, being a Babcock and Wilcox designed reactor, is unable to avoid or control bubble formation in the primary system which may occur subsequent to a loss of feedwater accident, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

25. Rancho Seco, being a Babcock and Wilcox designed reactor, does not have control room instrumentation which would indicate if the auxiliary feedwater or pressurizer relief valves are open or closed or the instrumentation to open or close such valves automatically, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

26. Rancho Seco, being a Babcock and Wilcox designed reactor, has a once through steam generator which makes the plant more susceptible and sensitive to a loss of feedwater transient, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

27. Rancho Seco, being a Babcock and Wilcox designed reactor,

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cannot be adequately operated so that the feedwater system and the auxiliary system can be controlled and operated separately, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

28. Rancho Seco, being a Babcock and Wilcox designed reactor, does not have sufficient or reliable off-site power in the event of a loss of feedwater transient causing a reactor trip, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

29. Rancho Seco, being a Babcock and Wilcox designed reactor, has insufficient instrumentation and capability to immediately retrieve necessary information or data during a loss of feedwater transient and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

30. SMUD, the licensee, has conducted insufficient analysis of what operations of the facility should be required to be automated or hard equipment responsibilities and what can be conducted manually or by plant personnel, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

31. Rancho Seco, being a Babcock and Wilcox designed reactor, has a control room configuration which is poorly and inadequately designed for plant operators to avoid a loss of feedwater transient, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

32. Rancho Seco, being a Babcock and Wilcox designed reactor, is operated by personnel and management whose competence has not been adequately tested and evaluated, namely testing has not been

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conducted as to whether such employees can act responsibly and appropriately to make judgment decisions during a loss of feedwater transient, personnel interviews have not been conducted to properly evaluate the test results with such employees and some employees have never been tested because of grandfathering, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

33. SMUD, the licensee, cannot be assured of necessary assistance from the Nuclear Regulatory Commission in the event of a loss of feedwater transient because of the Nuclear Regulatory Commission's failure to act quickly and decisively during the TMI-2 accident, and therefore Rancho Seco is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.

34. Rancho Seco, being a Babcock and Wilcox designed reactor, has not adequately trained unlicensed operators to respond to orders necessary for action which would be required in the event of loss of feedwater transient, and therefore is unsafe and endangers the health and safety of Petitioners, constituents of Petitioners and the public.


## CONCLUSION

Petitioners offer as evidence of the adequacy of the above contentions, the order and notice of hearing in Docket No. 50-346 for Three Mile Island Nuclear Station, Unit No. 1. These contentions are submitted on behalf of GARY HURSH and RICHARD D. CASTRO, Petitioners.

AUGUST 17, 1974

Submitted,

1024 12V

  
GARY HURSH, Petitioner  
Member Board of Directors

-7-Sacramento Municipal Utility District

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CERTIFICATE OF SERVICE

Michael L. Glaser, Esq., Chairman  
1150 17th Street, N.W.  
Washington, D.C. 20036

Dr. Richard F. Cole  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

David S. Kaplan, Esq.  
Secretary and General Counsel  
Sacramento Municipal Utility District  
P.O. Box 15830  
Sacramento, California 95813

Timothy V. A. Dillon, Esq.  
Suite 380  
1850 K Street, N.W.  
Washington, D. C. 20006

Mr. Richard D. Castro  
2231 K Street  
Sacramento, California 95816

James S. Reed, Esq.  
Michael H. Remy, Esq.  
Reed, Samuel & Remy  
717 K Street, Suite 405  
Sacramento, California 95814

Christopher Ellison, Esq.  
Dian Grueneich, Esq.  
California Energy Commission  
1111 Howe Avenue  
Sacramento, California 95825

Atomic Safety and Licensing  
Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Atomic Safety and Licensing  
Appeal Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Docketing and Service Station  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Lawrence Brenner, Esq.  
Stephen H. Lewis, Esq.  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Mr. Frederick J. Shon  
Atomic Safety and Licensing  
Board Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555



I, Elizabeth Leep, declare that on August 17, 1979 I forwarded a true and correct copy of the Contentions of Petitioners Gary Hursh and Richard Castro to the parties above-named.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 17th day of August, 1979, at Sacramento, California.

Elizabeth Leep