

1/11/80

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
BOSTON EDISON COMPANY, et al.) Docket No. 50-471
(Pilgrim Nuclear Generating)
Station, Unit 2))

NRC STAFF'S PROPOSED FINDINGS OF
FACT ON APPENDIX I ISSUES

Pursuant to 10 C.F.R. §2.754, the NRC Staff hereby submits Staff's Proposed Findings on Appendix I Issues to supplement the Staff's Proposed Findings of Fact and Conclusions of Law filed November 20, 1979. As with our earlier submittal, we have indicated where we adopt the Applicants' proposed findings, and the decision not to adopt a finding is not meant to imply that we recommend that it should be rejected.

D. Compliance with Appendix I.

(D1) The Staff adopts the Applicants' findings in paragraphs 84-88.

(D2) The Staff adopts the Applicants' findings in paragraph 89 with the addition of the following footnote to the first sentence:

*/ The last "base case" submitted by Applicants for the gaseous radwaste system (Amendment 26 to the PSAR) differed from an earlier such section in the PSAR in that it effectively deleted a charcoal adsorber by substituting an ambient temperature charcoal release system for a pressurized decay tank storage system. Tr. 6798-9. Even if technically feasible, the addition of a charcoal adsorber to the base system decided upon by the Applicants would not be cost-effective under Appendix I guidelines. Tr. 6789, 6796-99.

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(D3) The Staff adopts the Applicants' findings in paragraphs 90-91.

(D4) The Staff adopts the Applicants findings in paragraphs 92 and 93, with the addition of the phrase "For example" at the beginning of paragraphs 92.

(D5) The Staff adopts the Applicant's finding in paragraph 95.

(D6) The Staff adopts the Applicant's finding in paragraph 96 with the following changes:

In line 1, delete "For gaseous wastes" and substitute "According to Applicants' witness."

In line 1, add "for gaseous wastes" after the word "augment".

Add the phrase "in \$1000/man rem terms" to the end of line 4.

(D7) The Staff adopts the Applicants' findings in paragraph 97 with the following changes:

In line 5, insert "(as amended)" following "PSAR."

Following the last line, add: "The Staff's standardized methods for evaluating compliance with Appendix I are found in NUREG-0017 and Regulatory Guides 1.109 and 1.110. Id."

(D8) The Staff adopts the Applicants' findings in paragraphs 98 and 99.

(D9) The Staff adopts the Applicants' findings in paragraph 100 with the following change:

Delete the word "conservatively" in line 2.

(D10) The Staff adopts the Applicants' findings in paragraph 101 with the following changes:

In line 1, delete "most effective" and substitute "least costly."

Add the following footnote after the word "dollars" in line 4:

*/ Cost estimates are given in 1975 dollars by the Staff in order to make the valuation of augments comparable to the \$1000/man rem figure at the time it was promulgated. Tr. 6767, 6772.

(D11) The Staff adopts the Applicants' findings in paragraph 102 with the following change:

In line 1, delete the phrase "most effective" and substitute "least costly."

(D12) The Staff adopts the Applicants' findings in paragraphs 103-104.

(D13) The Staff adopts the Applicants' findings in paragraph 105 with the following change:

Delete "and exceeds" in line 2.

(D14) The Staff adopts the Applicants findings in paragraph 106.

(D15) The Staff would rewrite the Applicants' findings in paragraph 107 as follows:

The Staff's calculated maximum cost-assessment value, \$3,400, can be used to indicate the value of changing to any alternative site which could reduce the population within 50 miles, hence population doses, to zero. Since this value is de minimis from the standpoint of the consideration of alternate sites, we decide that MWF contention 1(b) is invalid.

Respectfully submitted,

Marcia E. Mulkey
Marcia E. Mulkey
Counsel for RC Staff

Dated at Bethesda, Maryland
this 11th day of January, 1980.

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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Unit 2))

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S PROPOSED FINDINGS OF FACT ON APPENDIX I ISSUES," in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 11th day of January, 1980:

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