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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	§	
No. 1)		

APPLICANT'S RESPONSE TO
JOHN F. DOHERTY'S FIFTH SET OF
INTERROGATORIES TO HOUSTON LIGHTING & POWER COMPANY

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

INTERROGATORY NO. 1:

What is the calculated release of radioactive materials in gaseous effluents from ACNGS at the gland seal and mechanical vacuum pump for each radionuclide except those less than 1.0 ci/yr for Noble gases or less than 10^{-4} ci/yr for Iodine or less than 1% of total for radionuclide? (See pg. S.5-24, FSFEIS.)

A. Has any gland seal release been included in "Mechanical vacuum pump" and "Total" in Table S.5.10 of the FSFEIS?

B. Has applicant stated any other reason or taken any other position for justifying the releases listed on pg. S.5-24 of the FSFEIS, other than they are within the Commission's limits?

ANSWER:

Applicant objects to this interrogatory in its entirety on the grounds that it is not related to any

1212 289

7910260 284 G

admitted contention.

INTERROGATORY NO. 2:

Referring to 5.A2 of pg. A-3 of Containment Structure Design Report (EBASCO Corp., Rev. 1), are the "magnitudes of all design bases loads" known at this time?

A. List these loads and their magnitudes.

B. List any loads not known and the reasons they have not been calculated as of 8/28/79.

C. Who is in charge of this aspect of containment design?

D. What qualifications does this person have to testify at the Construction License hearing on this aspect of construction?

ANSWER:

A.-D. Applicant objects to this interrogatory because it is vague and unspecific. The Allens Creek Containment Structures Design Report does not contain a page A-3 or a Section 5.A2. Further, the quote provided in this interrogatory cannot be found in the Containment Structures Design Report at all. Hence, without some clarification regarding which loads the Intervenor is asking about, Applicant cannot properly respond.

INTERROGATORY NO. 3:

In NEDO-10,173, on pg. 1-2, it states: "There is sufficient margin between the steady-state operating condition (operating limits) and the damage limit linear heat generation rate to accommodate the highest anticipated G. F. BWR reactor transient power without occurrence of fuel damages."

A. What are the principal experimental results for reaching this conclusion? (In answering, state the name of test reactors used and dates.)

B. What are the principal results relied on that do not use actual physical measurements in

arriving at this conclusion?

C. Is Applicant aware of any programs evaluating codes used to reach this conclusion? If so, state the name of any such programs and indicate how Applicant will receive information relevant to its reliance on these codes and amend them to be in compliance with the latest information.

ANSWER:

A.-C. Applicant objects to this interrogatory on the grounds that the referenced portion of NEDO-10173 is not relevant to the ACNGS design. The fuel referred to in NEDO-10173 (dated May, 1970) is designed for operation at 17.5 to 18.5 kw/ft. The fuel for the Allens Creek plant is designed for operation at 13.4 kw/ft. Hence, the quoted statement is not related to any admitted contention and the follow-on questions need not be answered.

INTERROGATORY NO. 4:

Does Applicant plan to introduce evidence on this Intervenor's speech-making in Houston, as a result of questions it asked this Intervenor at a deposition held earlier this year, at any prehearing conference or hearing in regard to ACNGS?

- A. If so, what evidence will it introduce?
- B. Who will introduce such evidence?

ANSWER:

Applicant objects to this question on the grounds that it is attempting to elicit the legal strategy of Applicant's counsel and is not designed to elicit information arguably related to admissible evidence.

INTERROGATORY NO. 5:

What questions will Applicant ask this Intervenor in regard to speech-making he has done in the past year with regard to nuclear power?

ANSWER:

See response to Interrogatory No. 4.

INTERROGATORY NO. 6:

Referring to Table 2 of the NEDO-20943, what "Fuel type" will ACNGS be fueled with on its first loading?

- A. If this is not decided, so state.
- B. On the second loading.
- C. On the third loading.
- D. If B. and C. are not decided, state that.

ANSWER:

A. The use of fuel type designations in Table 2 has been discontinued by General Electric. The present Allens Creek, fuel design, however, would fall under the L J series fuel classification as listed by this table.

B.,C.&D. The fuel type for the second and third fuel loading has not been decided.

INTERROGATORY NO. 7:

Does Applicant keep the names of persons who attempt to Intervene confidential from HL&P office workers who work in the towns where intervenors come from, such as Rosenberg, Richmond or Simonton?

ANSWER:

Applicant objects to this interrogatory on the grounds that it is totally unrelated to any admitted contention. Applicant would note, however, that it would be impossible to keep the identity of petitioners confidential when they have made an appearance in a public proceeding and entered their names in the public record.

INTERROGATORY NO. 8:

If the answer to above is "no", what is the policy of Applicant with regard to disseminating such information?

ANSWER:

See response to Interrogatory No. 7.

Respectfully submitted,

C. Thomas Biddle Jr

OF COUNSEL:

BAKER & BOTTS
3000 One Shell Plaza
Houston, Texas 77002

J. Gregory Copeland
C. Thomas Biddle, Jr.
Charles G. Thrash, Jr.
3000 One Shell Plaza
Houston, Texas 77002

LOWENSTEIN, NEWMAN, REIS,
AXELRAD & TOLL
1025 Connecticut Avenue, N.W.
Washington, D.C. 20036

Jack R. Newman
Robert H. Culp
1025 Connecticut Avenue, N.W.
Washington, D.C.

ATTORNEYS FOR APPLICANT
HOUSTON LIGHTING & POWER
COMPANY

STATE OF TEXAS §
 §
COUNTY OF HARRIS §

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared Jon G. White, who upon his oath stated that he has answered the foregoing Houston Lighting & Power Company's Response to John F. Doherty's Fifth 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 the 17 day of September, 1979.

Jeanette S. Patten
NOTARY PUBLIC IN AND FOR
HARRIS COUNTY, TEXAS

JEANETTE S. PATTEN
Notary Public in and for Harris County, Texas
My Commission Expires 4-14-81

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(Allens Creek Nuclear Generating §
Station, Unit 1) §

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to John F. Doherty's Fifth Set of Interrogatories to Houston Lighting & Power Company in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 17th day of September, 1979.

Sheldon J. Wolfe, Esq., Chairman
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. E. Leonard Cheatum
Route 3, Box 350A
Watkinsville, Georgia 30617

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

Mr. Chase R. Stephens
Docketing and Service Section
Office of the Secretary of the
Commission
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

R. Gordon Gooden, Esq.
Baker & Botts
1701 Pennsylvania Avenue, N. W.
Washington, D. C. 20006

Richard Lowerre, Esq.
Assistant Attorney General
for the State of Texas
P. O. Box 12548
Capitol Station
Austin, Texas 78711

Hon. LeRoy Valicek, Mayor
City of Wallis, Texas 77435

Hon. LeRoy Grebe
County Judge, Austin County
P. O. Box 767
Bellville, Texas 77481

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

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

Steve Sohinki, Esq.
Staff Counsel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. John F. Doherty
4438 1/2 Leeland
Houston, Texas 77023

Mr. Carro Hinderstein
8739 Link Terrace
Houston, Texas 77025

Ms. Brenda McCorkle
5140 Darnell
Houston, Texas 77074

Mr. James M. Scott, Jr.
8302 Albacore
Houston, Texas 77074

Mr. and Mrs. R. S. Framson
4022 Waynesboro Drive
Houston, Texas 77025

Mr. D. Marrack
420 Mulberry Lane
Bellaire, Texas 77401

Mr. H. Potthoff
7200 Shady Villa, No. 110
Houston, Texas 77055

Mr. Wayne E. Rentfro
P. O. Box 1335
Rosenberg, Texas 77471

C. Thomas Biddle, Jr.

C. Thomas Biddle, Jr.