

ISHAM, LINCOLN & BEALE
COUNSELORS AT LAW

ONE FIRST NATIONAL PLAZA FORTY-SECOND FLOOR
CHICAGO, ILLINOIS 60603
TELEPHONE 312-558-7500 TELEX: 2-5288

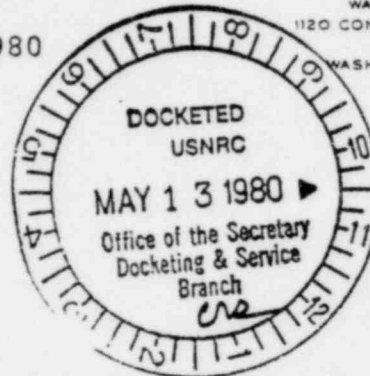
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May 8, 1980

WASHINGTON OFFICE
1120 CONNECTICUT AVENUE, N.W.
SUITE 325
WASHINGTON, D. C. 20036
202-633-9730

Mr. John O'Neill, II
Route 2, Box 44
Maple City, Michigan 49664



Dear John:

Consumers Power Company is having some difficulty in drafting testimony addressing your contention IIE-3, which reads:

The application has not adequately analyzed the possibility of criticality occurring in the fuel pool because of the increased density of storage without a gross distortion of the racks.

We want our testimony to be truly responsive to your contention and we think that would not be the case if the testimony takes the form of a generalized treatise on criticality, with the detailed criticality calculations performed for the Big Rock Point spent fuel pool attached. The purpose of this letter is to solicit your help.

As you know, Section 4 of the Description and Safety Analysis which accompanied Consumers' application in this matter, dated April 23, 1979, contains a nine-page summary of criticality considerations for the new racks. More recently, Consumers sent you its answers to Christa-Maria's Interrogatories 9-22 through 9-30 which explained at some length the statements and conclusions relating to criticality contained in the Description and Safety Analysis. In addition, Consumers provided copies of the detailed technical calculations supporting this criticality analysis. Consumers believes that the information we have provided constitutes a thorough and adequate analysis of criticality considerations affecting the proposed Big Rock Point spent fuel pool modification. We hope that you agree and will withdraw this contention so that we can all focus on other issues in this proceeding.

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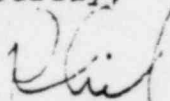
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If, however, you are not satisfied with our treatment of criticality, we would appreciate any guidance you can give us as to the specific aspects of these materials which you find inadequate or need further explanation. We appreciate that you are not an expert in criticality, but if you have any specific concerns or basic questions relating to criticality analyses in general or the Big Rock Point application in particular, we would like to address them in our testimony. The reference to pages 57-58 of Dr. Caldicott's book, "Nuclear Madness," in your answers to our Interrogatories does not help us much, since she merely raises the spectre of a melt-down in the fuel storage pool without explaining why criticality analyses generally performed by licensees are inadequate to avoid such a calamity. (You should know that the unfinished "safety study" Dr. Caldicott refers to was published as NUREG 0575 in August 1979. I think the NRC Staff would probably send you a copy free if you asked for one.)

With respect to your "Motion for Clarification of Legal Language:" inter alia means "among other things." "Slip op" is short for "slip opinion," which is the way lawyers cite to a decision which is so recent that it has not yet been published in bound volumes. Supra ("above") is a reference to a previous portion of the brief. Infra ("below") is a reference to a subsequent portion of the brief. Sub nomine, which we also used in our brief, means "under the name of" and indicates that the case changed names during the appeal process. Id., or "Ibid." stands for the Latin, "Ibidem," meaning "In the same place" or "in the same book," etc.

In the future I will try to keep Latin and legal terms to a minimum.

Sincerely,



Philip P. Steptoe

PPS/kb

CC: Big Rock Point Service List