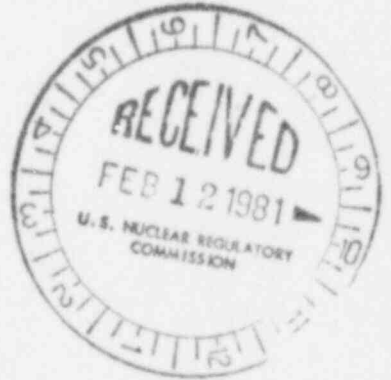


2/11/81

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of  
DUKE POWER COMPANY  
(William B. McGuire Nuclear  
Station, Units 1 and 2)

)  
)  
)  
)

Docket Nos. 50-360<sup>9</sup>  
50-370

NRC STAFF ANSWERS TO CESG INTERROGATORIES  
AND REQUESTS FOR DOCUMENTS

The following are the NRC answers to interrogatories propounded by Intervenor Carolina Environmental Study Group (CESG) on January 25, 1981. In each instance involving a request for documents pursuant to 10 C.F.R. § 2.741, the documents provided in response have been made available in the Public Document Room located in Charlotte, North Carolina for inspection and copying.

NRC STAFF ANSWERS

30. CESG Interrogatory:

Please provide the nuclear accident emergency plans of Huntersville, Cornelius, Davidson and the status of these plans regarding FEMA/NRC approval.

NRC Staff Answer:

The emergency plans for Huntersville, Cornelius, and Davidson are incorporated into the Mecklenburg County Radiological Emergency Response Plan in Support of the McGuire Nuclear Station. There are no separate,

individual plans for these localities. The Mecklenburg County plan, as well as the other county and State plans pertaining to McGuire, are under FEMA review. FEMA will provide to the NRC its findings and determinations as to whether State and local emergency plans are adequate and capable of being implemented. The NRC will then review the FEMA findings and determinations along with NRC's determination of the adequacy of the applicant's emergency response plans made with respect to the standards in Section 50.47(b) of 10 CFR Part 50, the requirements of Appendix E thereto, and the guidance contained in NUREG-0654 in making an overall assessment of the integrated state of emergency preparedness for that site.

31. CESG Interrogatory:

Please provide plans of counties within a 50 mile radius in regard to actions to be taken in the event of a particulate release within that radius and FEMA/NRC approval status.

NRC Staff Answer:

As provided in 10 CFR 50.47, emergency plans for the State and local governmental entities within the plume exposure pathway emergency planning zone (EPZ) are to be submitted for NRC and FEMA review. For the area outside the plume exposure pathway EPZ, but within the ingestion pathway EPZ, the regulation requires the licensee to submit the State plans only. The plume exposure pathway EPZ includes the counties of Mecklenburg, Gaston, Catawba, Iredell, and Lincoln and the State of North Carolina. The ingestion pathway EPZ additionally includes the State of South Carolina. Copies of the emergency plans for the aforementioned counties and States have been placed in the Local Public Document Room in Charlotte, North Carolina.

32. CESG Interrogatory:

Please provide a copy of 10 CFR 51.23 in regard to supplemental EIS.

NRC Staff Response:

A copy of 10 CFR 51.23 has been placed in the Local Public Document Room in Charlotte, North Carolina.

33. CESG Interrogatory:

Please provide a statement as to the period of involvement and the degree of effort of NRC in human factors studies. Please provide any reports, draft or final, which have resulted.

NRC Staff Response:

As a result of a number of studies undertaken shortly following the Three Mile Island-Unit 2 accident, it became apparent that greater attention should be devoted to human factors studies in nuclear power plant operation and design. Accordingly, in April of 1980 the NRC established within the Office of Nuclear Reactor Regulation a Division of Human Factors Safety. This Division includes four branches: Human Factors Engineering, Procedures and Test Review, Operator Licensing, and Licensee Qualification. A copy of a report prepared by the XYZYX Corporation entitled "Human Engineering Guidelines for use in Preparing Emergency Operating Procedures for Nuclear Power Plants," has been placed in the Local Public Document Room in Charlotte, North Carolina.

34. CESG Interrogatory:

What position does Staff intend to take in regard to the performance of a McGuire containment in the event of the combustion of quantities of hydrogen

which it is physically possible to generate as a consequence of the zirconium-water reaction?

NRC Staff Answer:

The Staff's position with respect to the foregoing issue will be set forth in testimony to be filed with the Board and all parties on February 17, 1981.

35. CESG Interrogatory:

What were the Staff's reasons for supporting CESG's motion to reopen, November 7, 1980? For example, did Staff think that all the legal requirements had been met? Does Staff think that a hydrogen release and combustion accident resulting in serious consequences could occur?

NRC Staff Answer:

"The Staff's reasons for supporting CESG's motion to reopen" are set forth in "NRC Staff Supplement to NRC Staff Response to CESG's Revised Motion to Reopen the Operating License Proceeding; Motion to Deny Applicant's Request for Fuel Loading, etc., and Revised Contentions" (November 7, 1980).

36. CESG Interrogatory:

Please provide a copy of Federal Register 45-40101, June 13, 1980, in which the Commission makes a statement in regard to supplemental EIS requirements for Class 9 accidents.

NRC Staff Response

A copy of the referenced document has been placed in the Local Public Document Room in Charlotte, North Carolina.

In addition to the foregoing interrogatories, CESG has supplemented interrogatories 4, 10, and 29, in response to Staff's position that the interrogatories are either objectionable (4 and 10) or fail to identify with sufficient specificity the document requested (29). NRC Staff Response to CESG interrogatories 4, 10, and 29, as supplemented, follows.

4. CESG Interrogatory:

Provide the AEC or NRC statements, prior to licensing, in regard to risk of accidents and public health and safety for 1) Fermi, 2) Browns Ferry, and Three Mile Island.

As Supplemented:

NRC objected to responding to this request on the grounds of relevance and admissibility. In accord with our phone conversation CESG herewith provides its reason for making the request, viewing the matter as both relevant and admissible. In McGuire OL, reopened, NRC Staff will presumably testify in regard to the likelihood of a hydrogen combustion accident and the possible consequences of such an accident. Staff will undoubtedly present expert witnesses. It is both relevant and admissible to examine the track record of the organization putting forth such testimony. Prior judgments as to the likelihood of accidents at Fermi, Browns Ferry, and TMI-2 are relevant in the highest degree.

NRC Staff Response:

Copies of the Safety Evaluation Reports for Fermi, Browns Ferry, and Three Mile Island have been placed in the Local Public Document Room in Charlotte, North Carolina.

10. CESG Interrogatory:

List, by plant and dates of occurrence, departures from normal operation both prior and subsequent to the TMI-2 accident in which there was a concern that the primary system would "go solid" or in which it did "go solid." Have Oyster Bay and Crystal River been involved in such incidents? If there have been such incidents identify plant type and power rating. Provide a full account of all such incidents.

As Supplemented:

NRC objected to this question as not relevant. The relevance lies in the fact that operators in the course of the TMI-2 accident were more concerned about going solid than about exposing the core. There presumably was a basis in fact for this concern. Going solid is as much to be avoided as uncovering the core. CESG seeks to learn what earlier industry experience and regulatory action may have led to this preeminent concern.

NRC Staff Response:

The "earlier industry experience..." that led to the "preeminent concern" about overpressurization is listed in Table 1 of the Attachment to Issue 15 in NUREG-0138, which is entitled Staff Discussion of Fifteen Technical Issues Listed in Attachment to November 3, 1976 Memorandum From Director, NRR to

NRR Staff, November 1976. Subsequent related experience is listed in Table 1 of NUREG-0224, which is entitled Reactor Vessel Pressure Transient Protection for Pressurized Water Reactors, September 1977. Copies of these documents have been placed in the Local Public Document Room in Charlotte, North Carolina.

29. CESG Interrogatory:

Reference: NUREG-CR-0400, p. 42, last paragraph.

Item: Document 1, in entirety if reasonably convenient.

Pp. 180-212 as a minimum concerning PWR/BWR QA/QC procedures.

As Supplemented:

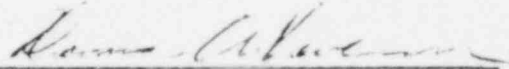
Your response indicated that this request was insufficiently specified. Please refer to the indicated reference, NUREG-0400, p. 42, last paragraph on page. The context is clearly defined. In reference to "the RSS final report" "...pages 180-212 are possibly the most interesting parts of Document 1 [the complete (but undated) write-up of the PWR/BWR QA/QC procedures]..." should prove adequate identification of work performed for the AEC and in major part undertaken by AEC staff.

NRC Staff Response:

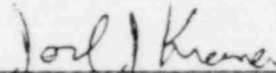
If, in its request, CESG is referring to "the RSS final report," a copy of that document (WASH-1400) has already been placed in the Local Public Document Room in Charlotte, North Carolina. If, on the other hand, CESG is referring to "the complete (but undated) writeup of the PWR/BWR QA/QC procedures," Staff is unable, without a more precise reference (e.g., title of document) to locate the document requested.

Intervenor has also requested copies of NUREG-0728, NUREG-0730, and audiovisual slides presented in a briefing for Commissioner Gilinsky on January 21, 1981. Copies of these documents have been placed in the Local Public Document Room in Charlotte, North Carolina.

I hereby certify that the information detailed above is true and accurate to the best of my personal knowledge.

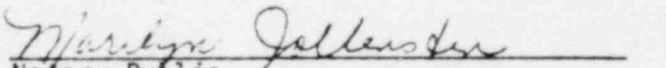
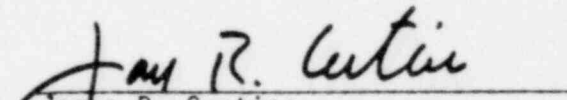


Thomas A. Kevern  
(Interrogatories 30, 31)



Joel J. Kramer  
(Interrogatory 33)

Sworn to before me this  
11<sup>th</sup> day of February, 1981.

  
Notary Public  
My Commission Expires: July 1, 1982  
James R. Curtiss  
(Interrogatories 34, 35)



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
DUKE POWER COMPANY ) Docket Nos. 50-369  
(William B. McGuire Nuclear ) 50-370  
Station, Units 1 and 2 )

CERTIFICATE OF SERVICE

I hereby certify that copies of, "NRC STAFF ANSWERS TO CERG INTERROGATORIES AND REQUESTS FOR DOCUMENTS", dated February 11, 1981, 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 February, 1981:

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U.S. Nuclear Regulatory Commission  
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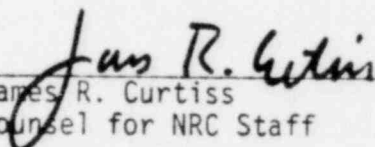
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James R. Curtiss  
Counsel for NRC Staff