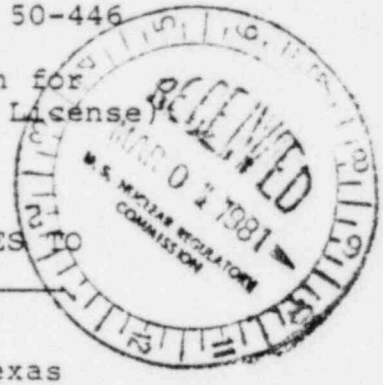
March 2, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
TEXAS UTILITIES GENERATING COMPANY, et al.	)	Docket Nos. 50-445 50-446
	)	
(Comanche Peak Steam Electric Station, Units 1 and 2)	)	(Application for Operating License)



APPLICANTS' SECOND SET OF INTERROGATORIES TO ACORN AND REQUESTS TO PRODUCE

Pursuant to 10 C.F.R. §§2.740b and 2.741, Texas Utilities Generating Company, et al. ("Applicants") hereby serve Applicants' Second Set of Interrogatories and Requests to Produce upon Texas Association of Community Organizations for Reform Now ("ACORN"). Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to ACORN, its officers, directors or members as well as any pertinent information known to its employees, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of ACORN, its officers, directors or members as well as its employees, advisors or counsel. In answering each interrogatory and in responding to each request, please recite the interrogatory or request

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preceeding each answer or response. Also, please identify the person providing each answer or response.[1/]

These interrogatories and requests shall be continuing in nature. Thus, any time ACORN obtains information which renders any previous response incorrect or indicates that a response was incorrect when made, ACORN should supplement its previous response to the appropriate interrogatory or request to produce. ACORN should also supplement its responses as necessary with respect to identification of each person expected to be called at the hearing as an expert witness, the subject matter of his or her testimony, and the substance of that testimony. The term "documents" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. We request that at a date or dates to be agreed upon, ACORN make available for inspection and copying, all documents subject to the requests set forth below.

APPLICANTS' INTERROGATORIES AND REQUEST TO PRODUCE

Contention 10: The CPSES design fails to adequately account for the effect of asymmetric loading resulting from a pipe break in the areas between the reactor vessel and the shield wall.

1/ The instant discovery requests directed to ACORN concern Contentions 10, 12 and 14 for which ACORN is lead-party Intervenor. If, however, any other Intervenor possesses information or documents requested herein which ACORN intends to use in support of its position on these contentions, such information or documents should be provided in response to these interrogatories and requests to produce.

1-2.[2/] What is your basis for Contention 10? Please list all documents not elsewhere identified in your responses to these interrogatories on which you rely with respect to Contention 10. Please provide copies of all such documents for inspection and copying.

2-2. Have you prepared any report, study or analysis with respect to Contention 10? If so please identify each such report, study or analysis by subject and author, including the author's professional and educational background. Please provide each such report, study or analysis for inspection and copying.

3-2. Have you caused others to prepare any report, study or analysis with respect to Contention 10? If so, please identify each such report, study or analysis by subject and author, including the professional and educational background of the author. Please provide for inspection and copying each such report, study or analysis on which you intend to rely.

4-2. Have you had any meetings or contacts with the other intervening parties with respect to Contention 10? If so, please specify the purpose of such meetings or contacts and the results of such meetings or contacts.

5-2. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 10? Please identify the purpose of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.

6-2. Do you plan to participate in the upcoming hearing with respect to Contention 10? If so, what will be the extent of your participation?

7-2. Do you plan to file testimony in the upcoming hearing with respect to Contention 10? If so,

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2/ Applicants have identified these interrogatories as the second set to ACORN by the hyphen 2 following each number.

who will be the sponsor (i.e., witness) of that testimony? Please set forth the nature of such testimony and the professional and educational background of the witness. Please provide copies of that testimony. Also, please identify by title, subject matter and author, and provide for inspection and copying, any documents which any such testimony will rely upon.

8-2. Do you plan to call any witness in the upcoming hearing with respect to Contention 10? If so, please provide a summary of his or her professional and educational background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 10.

9-2. If you plan to call any witness in the upcoming hearing with respect to Contention 10, please specify the nature and scope of that person's testimony. Please provide copies of such testimony. Please state whether that witness has conducted any research or made any studies on which the witness intends to rely. Also, identify by title, subject matter, and author, and provide for inspection and copying, any document on which such witness will rely in their testimony with regard to Contention 10.

10-2. Have you reviewed the Applicants' Final Safety Analysis Report ("FSAR")? If not, please explain. If so, please answer the following:

a. Do you object to any of the information, data or analyses contained or referenced therein with respect to postulated pipe breaks in high-energy piping systems applicable to the pipe break postulated in Contention 10?

b. If your answer to a. is in the affirmative, please identify those objections by the section of the FSAR to which you object and the substance of your objections.

c. If your answer to a. is in the affirmative, please explain how the information, data or analsis contained in the FSAR with respect to postulated pipe

breaks in high-energy piping systems fails to address the specific concern raised in Contention 10.

d. What are the bases (legal and/or other) for your responses to a. through c.?

11-2. Please identify precisely the location of the pipe break which is the subject of Contention 10?

12-2. What "type" of pipe break do you contend should be considered at the location identified in your response to Interrogatory 11-2? (E.g., circumferential and/or longitudinal)?

13-2. Please explain why the "type" of pipe break selected in your response to Interrogatory 12-2 was chosen.

14-2. Please identify in detail the particular forces on structures, systems and components which you contend will result from the pipe break postulated in Contention 10? Identify the thrust and reactive forces as functions of time and space (i.e., location).

15-2. Please set forth the analysis performed to derive the forces identified in your response to Interrogatory 14-2.

16-2. Please describe in detail the consequences postulated for the forces described in your response to Interrogatory 14-2.

17-2. Please set forth the analyses used in your response to interrogatory 16-2 to determine the consequences of the postulated pipe break.

18-2. What are the particular loads on the reactor vessel support system which you contend would be caused by the pipe break which is the subject of Contention 10?

19-2. Do you contend that the loads identified in your response to Interrogatory 18-2 would cause the reactor vessel to move? If so, please set forth the scenario which you contend would lead to such movement.

20-2. If your response to Interrogatory 19-2 is in the affirmative, please set forth the maximum loads which you contend the reactor pressure vessel support system could withstand without allowing the pressure vessel to move.

21-2. Under the loading scenario postulated in your response to Interrogatory 19-2, what are the loading effects which you postulate on all affected piping systems, including the Emergency Core Cooling System (ECCS) lines?

22-2. Do you contend that the pipe break postulated in Contention 10 would cause the control rods to function improperly?

23-2. If your response to Interrogatory 22-2 is in the affirmative, please identify the precise consequences of the pipe break on the control rods which you contend would result.

24-2. Do you contend that the pipe break postulated in Contention 10 would cause any damage to the fuel assemblies?

25-2. If your response to Interrogatory 24-2 is in the affirmative, please identify the particular damage which you contend might occur to the fuel assemblies and the consequences of such damage.

26-2. What are the maximum displacements of the reactor pressure vessel which you contend would result from the pipe break postulated in Contention 10? Please specify these displacements in terms of horizontal and vertical displacements and rotational displacement about the reactor vessel centerline.

27-2. What is the assumed maximum pipe break opening area for the pipe break postulated in Contention 10?

28-2. What is the shortest time which you contend must be considered for the time of severence of the pipe in the pipe break postulated in Contention 10?

29-2. What are the specific forces which you contend would occur within the reactor pressure vessel as a result of the pipe break postulated in Contention 10?

30-2. In what way do you contend the forces identified in your response to Interrogatory 29-2 would be propagated throughout the reactor pressure vessel following the pipe break postulated in Contention 10?

31-2. In what way do you contend reactor internals should be evaluated to determine their response following the pipe break postulated in Contention 10?

32-2. What are the forces, displacements and deflections (as functions of time and space) for all reactor internal components which you contend would be affected by the pipe break postulated in Contention 10?

33-2. What are the maximum deflections of the reactor internals which you contend are permissable in order to avoid any loss of their safety-related functions?

34-2. Do you contend that control rod insertion is required for safe plant shutdown? If so, please explain the reasons for your position.

35-2 Do you contend that the control rods will not be capable of insertion in the event of a pipe break as postulated in Contention 10?

36-2. If your response to Interrogatory 35-2 is in the affirmative, what are the consequences which you envision as a result of the failure of the control rods to drop following a pipe break as postulated in Contention 10?

37-2. For each of your responses to Interrogatories 11-2 through 36-2 please set forth the bases (technical and/or legal) for your responses.

38-2. Do you contend that equipment or aspects of operation of the Comanche Peak reactor that would affect or be affected by a pipe break as postulated in Contention 10 are in any way

unique so that Comanche Peak presents problems not present at other presurrized water reactors with respect the type of pipe break postulated in Contention 10?

39-2. If your response to Interrogatory 38-2 is in the affirmative, please set forth each component or structure which you contend is unique at Comanche Peak with respect to the problems described in Interrogatory 38-2.

40-2. If your response to Interrogatory 38-2 is in the affirmative, please set forth each operating condition at Comanche Peak which you contend is unique for Comanche Peak.

41-2. If your response to Interrogatory 38-2 is in the affirmative, please set forth precisely how a pipe break as postulated in Contention 10 would have consequences at Comanche Peak different from the consequences at other pressurized water reactors resulting from the same type of pipe break.

Contention 12: Neither the Applicants nor the Staff has reliable methods for evaluating and insuring that structures, systems and components important to safety are designed to withstand the affects [sic] of the safe shutdown earthquake without losing the capability to safely shutdown the plant; thus, General Design Criterion 2 has not been satisfied.

42-2. What is your basis for Contention 12? Please list all documents not elsewhere identified in your responses to these interrogatories on which you rely with respect to Contention 12. Please provide copies of all such documents for inspection and copying.

43-2. Have you prepared any report, study or analysis with respect to Contention 12? If so, please identify each such report, study or analysis by subject and author, including the author's professional and educational background. Please provide each such report, study or analysis for inspection and copying.

44-2. Have you caused others to prepare any report, study or analysis with respect to Contention 12? If so, please identify each such report, study or analysis by subject and author, including the professional and educational background of the author. Please provide for inspection and copying each such report, study or analysis on which you intend to rely.

45-2. Have you had any meetings or contacts with the other intervening parties with respect to Contention 12? If so, please specify the purpose of such meetings or contacts and the results of such meetings or contacts.

46-2. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 12? Please identify the purpose of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.

47-2. Do you plan to participate in the upcoming hearing with respect to Contention 12? If so, what will be the extent of your participation?

48-2. Do you plan to file testimony in the upcoming hearing with respect to Contention 12? If so, who will be the sponsor (i.e., witness) of that testimony? Please set forth the nature of such testimony and the professional and educational background of the witness. Please provide copies of that testimony. Also, please identify by title, subject matter and author, and provide for inspection and copying, any documents which any such testimony will rely upon.

49-2. Do you plan to call any witness in the upcoming hearing with respect to Contention 12? If so, please provide a summary of his or her professional and educational background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 12.

50-2. If you plan to call any witness in the upcoming hearing with respect to Contention 12, please specify the nature and scope of that person's

testimony. Please provide copies of such testimony. Please state whether that witness has conducted any research or made any studies on which the witness intends to rely. Also, identify by title, subject matter, and author, and provide for inspection and copying, any document on which such witness will rely in their testimony with regard to Contention 12.

51-2. Have you reviewed the Applicants' Final Safety Analysis Report ("FSAR")? If not, please explain. If so, please answer the following questions:

a. Do you object to any of the information, data or analysis contained or referenced therein with respect to the evaluation of the ability of structures, systems and components classified as Seismic Category 1 to withstand the effects of a safe shutdown earthquake (SSE)?

b. Do you object to any of the information, data or analysis contained or referenced therein with respect to evaluating the ability of structures, systems and components classified as Seismic Category 2 to withstand the effects of a SSE?

c. If your response to a. and/or b. is in the affirmative, please specify your objections by identifying the sections of the FSAR to which you object and the substance of your objections.

d. What are your bases (legal and/or other) for your responses to a., b. and c.?

52-2. What are the "structures, systems and components important to safety" which are the subject of Contention 12?

53-2. Specifically with regard to your response to Interrogatory 52-2, do you contend that any structures, systems or components other than those identified as Seismic Category 1 or Category 2 in the FSAR are the subject of Contention 12?

54-2. If your response to Interrogatory 53-2 is in the affirmative, please identify specifically each structure, system or component other than those categorized as Seismic Category 1 and 2 in the FSAR which you contend should be the subject of Contention 12.

55-2. What do you mean by the term "reliable methods" in Contention 12?

56-2. Do you agree that computer modelling can be an acceptable and reliable method for evaluating the response of Seismic Category 1 and 2 structures, systems and components with regard to responses to a safe shutdown earthquake?

57-2. If your response to Interrogatory 56-2 is in the affirmative, please state whether you contend that any of the computer analyses conducted for Comanche Peak with respect to evaluating those responses are not reliable? If so, please specify the computer analyses and your objections.

58-2. If your response to Interrogatory 56-2 is in the negative, please set forth the method of evaluation which you contend should be utilized to determine the ability of structures, systems and components which are the subject of Contention 12 to withstand a safe shutdown earthquake.

59-2. What are your bases (legal and/or other) for your responses to Interrogatories 55-2 through 58-2?

60-2. What do you contend the structures, systems and components which are the subject of Contention 12 should be designed to assure in the event of a safe shutdown earthquake?

61-2. Have you constructed or have you caused to be constructed any mathematical model to analyze the dynamic characteristics of the structures, systems or components which are the subject of Contention 12 during and after a safe shutdown earthquake?

62-2. If your response to Interrogatory 61-2 is in the affirmative, please set forth those models.

63-2. If your response to Interrogatory 61-2 is in the negative, please explain your justification for contending that the Applicants' analyses on that subject are unreliable.

64-2. Have you computed or have you caused to be computed any response spectra for horizontal and vertical ground motion for the safe shut-down earthquake?

65-2. If your response to Interrogatory 64-2 is in the affirmative, please set forth those response spectra.

66-2. If your response to Interrogatory 64-2 is in the negative, please specify your justification for contending that the Applicants' analysis of the responses of the structures, systems and components which are the subject of Contention 12 are unreliable.

67-2. Do you contend that any of the testing or analysis of Seismic Category 1 electrical and mechanical equipment and equipment supports performed for Comanche Peak is unreliable?

68-2. If your response to Interrogatory 67-2 is in the affirmative, please specify your objections and set forth your basis for those objections.

69-2. If your response to Interrogatory 67-2 is in the negative, what is your basis for contending that Seismic Category 1 equipment and equipment supports have not been subjected to reliable tests or analyses with respect to their ability to maintain functional operability during and after an earthquake up to and including the magnitude of the SSE.

70-2. Do you contend that Seismic Category 1 equipment and equipment supports would not be able to maintain functional operability during and after an earthquake of the magnitude up to and including the SSE?

71-2. If your response to Interrogatory 70-2 is in the affirmative, please set forth with specificity the basis for your response.

72-2. Do you contend that any of the testing or analyses performed for Comanche Peak with respect to the interaction of Seismic Category 1 structures and the ground are unreliable?

73-2. If your response to Interrogatory 72-2 is in the affirmative, please set forth with specificity your objections to such testing and analyses and your bases for your objections.

74-2. Do you object to any of the analyses with respect to the interaction of non-Seismic Category 1 structures with Seismic Category 1 structures as performed for Comanche Peak?

75-2. If your response to Interrogatory 74-2 is in the affirmative, please specify your objections and set forth the bases for those objections.

76-2. Do you contend that any of the analyses performed for the Comanche Peak safe shutdown impoundment dam with respect to seismic responses is unreliable?

77-2. If your response to Interrogatory 76-2 is in the affirmative, please specify your objections to those analyses and set forth the bases for your objections.

78-2. Do you contend that any of the analyses performed for Seismic Category 1 piping systems and tunnels for Comanche Peak with respect to seismic responses is unreliable?

79-2. If your response to Interrogatory 78-2 is in the affirmative, please specify your objections and set forth the bases for those objections.

Contention 14: The DC Power System for the CPSES plant fails to meet the single failure criterion as defined in 10 C.F.R. Part 50, Appendix A.

80-2. What is your basis for Contention 14? Please list all documents not elsewhere identified in your responses to these interrogatories on which you rely with respect to Contention 14. Please provide copies of all such documents for inspection and copying.

81-2. Have you prepared any report, study or analysis with respect to Contention 14? If so, please identify each such report, study or analysis by subject and author, including the author's professional and educational background. Please provide each such report, study or analysis for inspection and copying.

82-2. Have you caused others to prepare any report, study or analysis with respect to Contention 14? If so, please identify each such report, study or analysis by subject and author, including the professional and educational background of the author. Please provide for inspection and copying each such report, study or analysis on which you intend to rely.

83-2. Have you had any meetings or contacts with the other intervening parties with respect to Contention 14? If so, please specify the purpose of such meetings or contacts and the results of such meetings or contacts.

84-2. What are the dates of the meetings or contacts you have had with persons other than the intervening parties with respect to Contention 14? Please identify the purpose of those meetings or contacts, the other persons involved, and the results of such meetings or contacts.

85-2. Do you plan to participate in the upcoming hearing with respect to Contention 14? If so, what will be the extent of your participation?

86-2. Do you plan to file testimony in the upcoming hearing with respect to Contention 14? If so, who will be the sponsor (i.e., witness) of that testimony? Please set forth the nature of such testimony and the professional and educational background of the witness. Please provide copies of that testimony. Also, please identify by title, subject matter and author, and provide for inspection and copying, any documents which any such testimony will rely upon.

87-2. Do you plan to call any witness in the upcoming hearing with respect to Contention 14? If so,

please provide a summary of his or her professional and educational background. Also, set forth any information which has a bearing on his or her qualifications to testify in this proceeding on Contention 14.

88-2. If you plan to call any witness in the upcoming hearing with respect to Contention 14, please specify the nature and scope of that person's testimony. Please provide copies of such testimony. Please state whether that witness has conducted any research or made any studies on which the witness intends to rely. Also, identify by title, subject matter, and author, and provide for inspection and copying, any document on which such witness will rely in their testimony with regard to Contention 14.

89-2. Have you reviewed the Applicants' Final Safety Analysis Report ("FSAR")? If not, please explain. If so, please answer the following:

a. Do you object to any of the information, data or analysis contained or referenced therein with respect to the capability of the on-site DC power system to perform its safety functions assuming a single failure?

b. If your answer to a. is in the affirmative, please specify your objections by identifying the section of the FSAR to which you object and the substance of your objections.

c. What are the bases (legal and/or other) for your responses to a. and b.?

90-2. What do you contend is meant by the term "single failure" as used in NRC regulations and regulatory requirements?

91-2. What is your basis (legal and/or other) for your response to Interrogatory 90-2?

92-2. What do you contend is the method by which the single failure criterion should be applied to the on-site DC power system? Please specify the assumptions which you contend the single

failure criterion requires be made in evaluating the capability of the on-site DC power system to perform its safety functions.

93-2. What is your basis (legal and/or other) for your response to Interrogatory 92-2?

94-2. What equipment do you contend is included within the on-site DC power system which is the subject of Contention 14? Please specify whether that equipment is any different from the on-site DC power system as set forth in the FSAR.

95-2. Is it your contention that the on-site DC power system for Comanche Peak does not have sufficient independence, redundancy, and testability to perform its safety functions in the event of a single failure?

96-2. If your response to Interrogatory 95-2 is in the affirmative, please set forth with particularity the precise scenario which you contend demonstrates the inability of the on-site DC power system to perform its safety functions in the event of a single failure.

97-2. If your response to Interrogatory 95-2 is in the negative, please explain the meaning of Contention 14?

98-2. What are your bases (legal and/or other) for your responses to Interrogatories 94-2 through 97-2?

99-2. Do you contend that the on-site DC power system for Comanche Peak is not designed to provide redundant load groups (as defined in Regulatory Guide 1.6) for electrically powered safety loads such that the loss of any one group will not prevent minimum safety functions from being performed?

100-2. If your response to Interrogatory 99-2 is in the affirmative, please specify where such redundancy is not provided in the on-site DC power system.

101-2. What are your bases (legal and/or other) for your responses to Interrogatories 99-2 and 100-2?

102-2. What do you contend is the probability of a simultaneous and independent failure of the redundant on-site DC power supplies for Comanche Peak?

103-2. With respect to your response to Interrogatory 102-2, do you contend that the probability identified in your response necessitates evaluation of such a failure as a credible accident for Comanche Peak?

104-2. What are your bases (legal and/or other) for your responses to Interrogatories 102-2 and 103-2?

105-2. What do you contend is the likelihood of a failure of each of the redundant DC power supplies from a common event?

106-2. Do you contend that the likelihood of a failure from a common event identified in your response to Interrogatory 105-2 is sufficiently great that such failure should be considered a credible event for Comanche Peak?

107-2. What are your bases (legal and/or other) for your responses to Interrogatories 105-2 and 106-2?

108-2. Do you contend that the scenario leading to the failure of both of the redundant on-site DC power supplies would prevent the starting of the redundant diesel?

109-2. Do you contend that even in the event of a failure of both redundant DC power supplies there are no alternative measures for restoration of power or for removal of decay heat?

110-2. If your response to Interrogatory 109-2 is in the negative, please set forth those alternatives which you contend would be available in order to restore power or remove decay heat.

111-2. With respect to each of the alternative measures identified in your response to Interrogatory 110-2, what is the amount of time which you contend the operator would have in order to implement those measures in order to safely shut down the reactor?

112-2. What are your bases (legal and/or other) for your responses to Interrogatories 108-2 through 111-2?

113-2. Do you contend that each DC load group at Comanche Peak cannot be energized by both a battery and a battery charger for each redundant load group?

114-2. Do you contend that there are automatic connections between the battery-charger combination for each DC load group and any other redundant DC load group?

115-2. Do you contend that redundant DC load groups are not independent from redundant standby power sources (as defined in Regulatory Guide 1.6) in any of the following respects:

a. The standby source of one load group is automatically parallel with the standby source of another load group under accident conditions;

b. A load group can be automatically connected to another load group;

c. Provisions exist for automatically transferring loads between redundant power sources.

116-2. Do you contend that interlocks to prevent an operator error that would parallel standby power sources are required for the Comanche Peak redundant DC load groups? If so, please specify where such interlocks should be provided.

117-2. What are your bases (legal and/or other) for your responses to Interrogatories 113-2 through 116-2?

118-2. Do you contend that the physical separation of the Class 1-E DC power systems in any way contributes to the absence of the ability to withstand a single failure so as to be able to perform required safety functions as you contend in Contention 14?

119-2. If your response to Interrogatory 118-2 is in the affirmative, please specify your objections and set forth your bases (legal and/or other) for your response.

Respectfully submitted,

Nicholas S. Reynolds

William A. Horin

William A. Horin

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March 2, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
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TEXAS UTILITIES GENERATING COMPANY, et al.	)	Docket Nos. 50-445 50-446
	)	
(Comanche Peak Steam Electric Station, Units 1 and 2)	)	(Application for Operating License)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing "Applicants' Second Set of Interrogatories to ACORN and Requests to Produce", in the above captioned matter were served upon the following persons by deposit in the United States mail, first class postage prepaid this 2nd day of March, 1981:

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