



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

LOCAL PDR
50-352



MAR 24 1981

Mr. Marvin I. Lewis:
6504 Bradford Terrace
Philadelphia, Pennsylvania 19149

Dear Mr. Lewis:

This is in response to your letter of February 16, 1981 in which you asked a number of questions and provided additional comments concerning concrete placement and curing.

Answers to your six direct questions are contained in the enclosure to this letter.

Your additional comments concerning concrete and possible effects from blast induced vibrations have been previously noted. As indicated in earlier letters to you and Mr. Romano, we will consider this aspect in our safety review.

I would like to assure you that the quality control of nuclear plants is very much in the area of our interest and we appreciate your concern.

In pursuance of this matter the staff is requesting the Philadelphia Electric Company (PECo) to provide a record of blastings and concrete pours for Class I structures. In addition they will be asked to correlate the data so that more precise information will be available to assist in an analysis of the effect of blasting on the quality of concrete. When this information is available appropriate actions will be taken if necessary.

Once again, I wish to express my appreciation for your continuous interest in this matter and assure you that it is receiving our keenest attention.

Sincerely,

Robert L. Tedesco, Assistant Director
for Licensing
Division of Licensing

Enclosure:
As stated

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RESPONSES TO QUESTIONS

QUESTION A

Has an OL ever been denied to a licensee on a completed or partially completed reactor?

ANSWER

No OL has been denied to a licensee on a completed or partially completed plant to date.

QUESTION B

Will the public have access to the Probabilistic Risk Assessment (PRA) report and will the public be able to raise questions in a timely fashion? By timely, I mean before the staff closes its review or will the public have to petition to question this PRA in hearings?

ANSWER

The public will have access to the risk assessment report and thus will be given an opportunity to provide comments during the course of the OL review.

QUESTION C

"Requirements cannot be backfitted." (Your statement) This seems to say that plants cannot be made safer than originally approved. This statement contradicts many TMI lessons learned orders of the Commission. Please explain this contradiction. Do Mr. Tedesco's letters carry more force than the Commission's Orders?

ANSWER

The comment relative to "backfitting" in the letter of February 4, 1981 applies to the application of siting criteria to plants whose application for a construction permit are dated prior to October 1, 1979. This in no way implies that design changes to the plant cannot be made to increase the safety of the facility, e.g., application of TMI lessons learned orders.

QUESTION D

"PECo has stated that the criterion contained in Dr. Harold Lewis' report (will or) were considered and factored into the study. Where (reference) does PECO make this statement? Which criterion of the Lewis' report were considered and factored into study? All or just those that make Limerick look good? What criterion in the Lewis report will the staff require to be used in the PECO study, if any? How were the criterion factored in? Specifics? Methodology?

ANSWER

PECo indicated that comments made in the Lewis report had been considered in the risk study during the technical meeting on December 9, 1981. The extent to which this is adequately accomplished will be studied in the staff review of the final report.

QUESTION E

"includes Class 9 accidents" (Your statement) Which class 9 accidents? All? Those in WASH 1400 only? TMI#2 scenarios only?

ANSWER

The coverage of Class 9 accidents will be an area of specific interest in our review of the risk report. The exact extent of coverage will not be known exactly until we receive the final report from PECO.

QUESTION F

The paragraph on Page 2 concerning concrete appears self-contradictory. "This aspect ("concrete meets minimum strength requirements") will be considered and reviewed carefully in our (NRC) review of (PECo) study." Yet the previous sentence states, "The (PECo) risk study assumes that the concrete meets these (ACI) minimum strength requirements."

ANSWER

The basis for the risk study rests on certain assumptions. If these assumptions prove to be in error as a result of "as built" conditions, then necessary corrective action must be taken by the applicant to correct the situation. The "as built" condition of the concrete will be considered and reviewed as we proceed with our review of the OL application.