

December 8, 1980

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))
)

JOINT RESPONSE OF NRC STAFF AND APPLICANT
TO ASLB ORDER AT PREHEARING CONFERENCE TO
SUBMIT A PROPOSED SCHEDULE FOR COMMENCEMENT
OF HEARINGS ON HEALTH AND SAFETY ISSUES

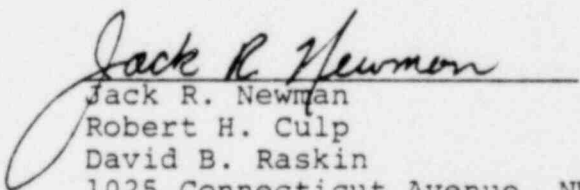
At the prehearing conference held in this proceeding on December 2, 1980, the Board directed the NRC Staff and Applicant to submit to the Board and parties within 5 days a proposed schedule for commencement of evidentiary hearings on health and safety issues. In response to the Board's Order, the Staff and Applicant have conferred, and submit the following proposed schedule.

The Staff and Applicant have identified thirty health and safety issues which are neither the subject of pending motions for summary disposition, nor are issues related to post-TMI proposed licensing requirements. Accordingly, these issues are now ripe for trial. A list of these thirty issues is set forth in Attachment A to this response.

DS63

Applicant is prepared to commence hearings on all of these issues beginning May 1, 1981. Based upon current estimates of manpower resources, the Staff has identified sixteen of the thirty issues listed on Attachment A as to which the Staff can support a hearing date of May 1, 1981. These sixteen issues are set forth in Attachment B. The Staff and Applicant request the Board to establish a date of May 1, 1981, for commencement of the evidentiary hearings on the sixteen issues listed in Attachment B, with the date of April 10, 1981, for filing of testimony on these issues. With respect to the remaining fourteen issues listed in Attachment A, the Staff and Applicant anticipate that the hearings on these issues would commence shortly after the completion of the hearings on the first sixteen issues. A more definite schedule for hearings on these issues can be discussed among the Board and the parties in January, 1981.

Respectfully submitted,



Jack R. Newman

Robert H. Culp
David B. Raskin
1025 Connecticut Avenue, NW
Washington, DC 20036

J. Gregory Copeland
C. Thomas Biddle
Darrell Hancock
3000 One Shell Plaza
Houston, Texas 77002

OF COUNSEL:

LOWENSTEIN, NEWMAN, REIS
& AXELRAD
1025 Connecticut Avenue, NW
Washington, DC 20036

BAKER & BOTTS
3000 One Shell Plaza
Houston, Texas 77002

ATTORNEYS FOR APPLICANT
HOUSTON LIGHTING & POWER COMPANY

LIST OF HEALTH AND SAFETY ISSUES RIPE FOR HEARING

Doherty	9	-	Containment buckling
TexPirg	36 (McCorkle 17)	-	Charcoal adsorber
Doherty	32	-	ECCS vaporization
TexPirg	AC 41	-	Reactor pressure limits/relief valves
TexPirg	AC 55	-	Rapid depressurization/steam break
Bishop	4&5	-	Pipeline rupture/24" gas line
Bishop	7	-	Pipeline rupture/dam breach
Bishop	9	-	Pipeline rupture/non-methane
Bishop	10	-	Pipeline rupture/Brazos River
Doherty	29	-	Blockage of intake canal
Doherty	20 (a)	-	Gap conductance
Doherty	39	-	Fuel swelling
Doherty	14, 25	-	Fuel failure/MSLRM
Doherty	3	-	Fuel specific enthalpy
Doherty	6	-	Recirculation pump overspeed
Doherty	7	-	LPCI cold-slug
Doherty	48	-	CRD return line
Doherty	26 (a)	-	Stud bolts
Doherty	50	-	Jet pump beam
Doherty	41	-	Water level indicators
(and TexPirg AC 54)			
ASLB	11	-	RHR single failure
TexPirg	39	-	Fracture toughness (generic issue A-11)
Doherty	27	-	Reactor pedestal
ASLB	10	-	Bypass leakage
TexPirg	26	-	Computer code error
Doherty	30	-	Interconnection/grid stability
TexPirg	AC 21	-	Occupational exposure
ASLB	8	-	Seismic category 1 - control rods, control rod drives and control units
TexPirg	6 (Bishop 18)	-	Aircraft hazards

LIST OF HEALTH AND SAFETY ISSUES FOR HEARING ON MAY 1, 1981

Doherty	9	-	Containment buckling
Bishop	4&5	-	Pipeline rupture/24" gas line
Bishop	7	-	Pipeline rupture/dam breach
Bishop	9	-	Pipeline rupture/non-methane
Bishop	10	-	Pipeline rupture/Brazos River
Doherty	29	-	Blockage of intake canal
Doherty	20(a)	-	Gap conductance
Doherty	39	-	Fuel swelling
Doherty	3	-	Fuel specific enthalpy
Doherty	7	-	LPCI cold-slug
Doherty	26(a)	-	Stud bolts
Doherty	27	-	Reactor pedestal
TexPirg	26	-	Computer code error
Doherty	30	-	Interconnection/grid stability
TexPirg	6 (Bishop 18)	-	Aircraft hazards

Richard Black, Esq.
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

John F. Doherty
4327 Alconbury Street
Houston, Texas 77021

TexPirg
Att: Clarence Johnson
Executive Director
Box 237 U.S.
University of Houston
Houston, Texas 7704

Carro Hinderstein
609 Fannin Street
Suite 521
Houston, Texas 77002

D. Marrack
420 Mulberry Lane
Bellaire, Texas 77401

Brenda McCorkle
6140 Darnell
Houston, Texas 77074

F. H. Potthoff, III
7200 Shady Villa, #110
Houston, Texas 77080

Wayne E. Rentfro
P. O. Box 1335
Rosenberg, TEXas 77471

James M. Scott, Jr.
13935 Ivy Mount
Sugar Land, Texas 77478

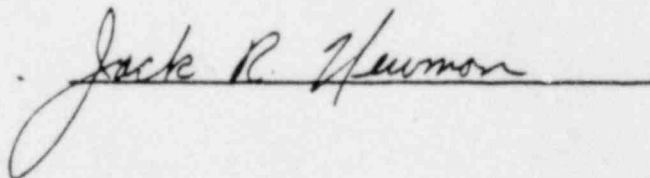
William Schuessler
5810 Darnell
Houston, Texas 77074

Stephen A. Doggett, Esq.
P. O. Box 592
Rosenberg, Texas 77471

Bryan L. Baker
1923 Hawthorne
Houston, Texas 77098

J. Morgan Bishop
Margaret Bishop
11418 Oak Spring
Houston, Texas 77043

W. Matthew Perrenod
4070 Merrick
Houston, Texas 77024

A handwritten signature in cursive script, reading "Jack R. Hewman", is written over a horizontal line.

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 1))
)

CERTIFICATE OF SERVICE

I hereby certify that copies of Joint Response of NRC Staff and Applicant to ASLB Order at Prehearing Conference to Submit a Proposed Schedule for Commencement of Hearings on Health and Safety Issues were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 8th day of December, 1980:

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

Dr. E. Leonard Cheatum
Route 3, Box 350A
Watkinsville, Georgia 30677

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

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

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

Susan Plettman, Esq.
David Preister, Esq.
State Attorney General's Office
P.O. Box 12548
Austin, Texas 78711

Hon. Charles J. Dusek
Mayor, City of Wallis
P. O. Box 312
Wallis, Texas 77485

Hon. Leroy H. Grebe
County Judge, Austin County
P. O. Box 99
Bellville, Texas 77418

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