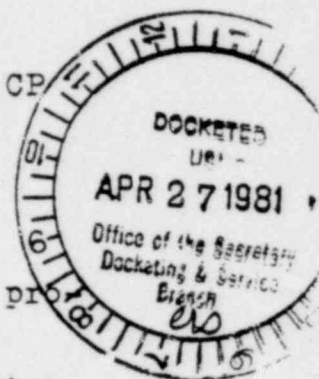


UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION APRIL 23, 1981
BEFORE THE ATOMIC SAFETY & LICENSING BOARD

In the Matter of:
(HOUSTON LIGHTING & POWER CO.
(Allens Creek Nuclear Gener-
ating Station, Unit 1)

Docket No. 50-466 CP



INTERVENOR JOHN F. DOHERTY'S CONTENTION #56

John F. Doherty, intervenor pro-se in the above proceedings now files the below Contention #56.

Intervenor contends Applicant's reactor trip system is not protected against a pipe break to the scram discharge volumes from the hydraulic control units. Sudden breakage of one or more of these pipes would impair public safety because the water would continue to come out of the reactor and possibly drown out, short or otherwise stop the recirculation cooling pumps which are located below them, and there is no valve upstream of such break locations to permit stopping the loss of coolant. A plausible physical mechanism for pipe break in this part of the control rod hydraulic system would be thermal shock to the non-safety grade piping. Such thermal shock results on a reactor scram.

This Contention is based on the results of the investigation of the June 28, 1980, partial scram failure at the Brown's Ferry, Unit 3, by the NRC Office for Analysis and Evaluation of Operational Data, authored by Carlyle Michaelson. The report was sent to the Commissioners on April 7, 1981, as reported in the Washington Post, of April 8, 1981 on page A-9 (attached).

To the best of this Intervenor's knowledge the report was the first publication of discovery of the problem in the contention. Intervenor believes the requirements of 10 CFR 2.714 (i) and (iv) are met by him at the threshold, that is, the timing of the report lays good cause for a late filing, and that there is indeed no other party representing his interest on this issue. In 10 CFR 2.714 (ii) Intervenor believes it cannot be shown there is available at this time other means by which his interest will be protected on this issue. Under 10 CFR 2.714 (v), this

Intervenor would point out the final schedule for hearing safety issues is not determined. Indeed, discovery on issues, while others are in litigation is permissible in a multi-issue administrative hearing, although not desirable. In any case it is not reasonable to deny an Intervenor the right to hear an issue, because he won't have time to do discovery on the issue. Under 10 CFR 2.714 (iii) this Intervenor would only urge that a record which does not cover an issue cannot be complete as one that does even if the Intervening party does not present expert testimony.

Therefore, this Intervenor requests the Board admit into controversy his Contention #56, with discovery to begin at once.

Respectfully Submitted,

John F. Doherty
John F. Doherty, J. D.
Intervenor

CERTIFICATE OF SERVICE

Copies of "INTERVENOR JOHN F. DOHERTY'S CONTENTION #56" were served on the below parties via First Class U. S. Postal Service, this 23rd April, 1981.

Sheldon J. Wolfe, Esq., Gustave A. Linenberger, Dr. E. Leonard Cheatum, Administrative Judges

J. Gregory Copeland, Esq. and Jack R. Newman, Esq., Applicant

Richard A. Black, Esq. Staff

Docketing & Service, NRC

Atomic Safety Licensing & Appeal Board

The Several Intervening Parties

NRC Eyes Problems In Reactor Plumbing

By Joanne Ormang

Washington Post Staff Writer

The Nuclear Regulatory Commission is checking two "potentially serious" problems of plumbing and stress that could lead to meltdowns in any of the nation's operating nuclear power plants and a resulting disastrous explosion of radioactivity.

One involves pressurized-water reactors, which comprise about two-thirds of the nation's 74 nuclear plants. It is possible, according to Harold Denton, NRC's director of reactor regulation, that some have brittle walls that could crack if they received a sudden high-pressure burst of cold water when they are very hot. A jet of cold water might be injected during a malfunction or accident, crack the reactor vessel, and cause a meltdown.

The other problem involves the 23 boiling-water reactors. If there is a break or leak in one of the pipes that carry water out of the reactor after a sudden shutdown, it would be hard to stop the leak and prevent all the water from escaping the reactor, again causing a meltdown.

Scientists have long known that neutron radiation from the reactor core makes the vessel walls brittle over time, but recent research has found it occurring faster than expected. They have also known that cold water on hot metal causes thermal stress, and built reactors to mix incoming cold water with hot water to cushion the impact. But Denton told reactor owners last week that research had also found "quite severe thermal shocks in more or less normal operation" with relatively small accidents.

Ironically, new rules in effect since the accident at Three Mile Island two years ago could make things worse. The rules require operators to leave high-pressure water pumps running if they come on automatically because operators at TMI turned them off and the reactor core overheated as a result. But leaving them on, it turns out, increases pressure on the hot walls at the worst possible moment — just as the cold water hits.

The boiling-water reactor problem involves several pipes ranging in diameter from 3/4-inch to 6 inches that carry about 600 gallons of water out of the reactor core to a storage tank when there is an automatic shutdown. The pipes also undergo "significant thermal shock" and apparently are used so little that they do not fall under the NRC's regulations for routine inspection, said Stuart D. Rubin, lead reactor systems engineer at the NRC.

If one or more should break, highly radioactive water would spill into the reactor building where it would threaten the plant's safety systems, including water pumps directly below, and the flow might continue until the core was uncovered, Rubin said.

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