

RELATED CORRESPONDENCE

DUPLICATE
USNRC

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UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

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SECRETARY
& SERVICE
OFFICE

Before the Atomic Safety and Licensing Board



Wisconsin Electric Power Company
POINT BEACH NUCLEAR PLANT UNITS 1 & 2
Docket Nos. 50-266 and 50-301
Operating License Amendment
(Steam Generator Tube Sleeving Program)

DECADE'S ANSWER TO LICENSEE'S SECOND SET OF INTERROGATORIES
RELATIVE TO FULL SCALE SLEEVING

Wisconsin's Environmental Decade, Inc. ("Decade") makes the following full and complete answer, under oath, to the Licensee's Second Set of Interrogatories and Request for Production of Documents to Intervenor Decade Relative to Full Scale Sleeving Program, dated November 20, 1981.

Qualification

This answer does not repeat matters or provide documents which are already included, provided or referenced in the official record in the proceedings in the above-captioned matter or in the related proceedings before the Public Service Commission of Wisconsin in its dockets 6630-CE-20, 6630-UI-2 and 6630-ER-10, to which the Licensee has been a full party, nor does the answer include matters which are privileged. It is also expressly noted that additional bases for the Contentions may arise in response to subsequent discovery, independent investigation and cross-examination.

Interrogatories

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1. The Decade wishes to litigate, at this time, five additional concerns: the first relates to the damage which may be caused to the original tubes which have previously been plugged when (or if) the plug is removed in preparation for sleeving; the second relates to the interactive effects between measures undertaken to alleviate thermal shock or embrittlement of the reactor vessel and steam generator tube degradation; the third relates to the possibility for damage to the tube ends as part of the decontamination process used to prepare for sleeving; fourth relates to the problem of leaking plugs rocking loose in the course of a loss-of-coolant accident; and the fifth relates to the increasing numbers of detected defects in the free standing region of the steam generator tube bundle which might rupture during the course of a loss-of-coolant-accident.

2. See Qualification.

3. a. See Qualification.

b. Objection is made to this interrogatory. To state the name of each person known to have knowledge in this area would be oppressive and an undue burden.

c. At the present time, we do not have plans to call any witnesses to support these concerns.

4. Not applicable.

5. See Qualification.

6. At the present time, we do not have plans to offer exhibits during the proceeding to support these concerns.

7. Peter Anderson, Director of Public Affairs, Wisconsin's Environmental Decade, 114 North Carroll Street, Suite 208,

Madison, Wisconsin 53703.

8. Mr. Anderson prepared the answers to each of the interrogatories.

9. See ¶7, supra.

10. The only additional information relied upon for the concerns stated in ¶1, supra, other than that which was identified in previous submittals for which a file search was conducted, was the Licensee's November 13, 1981 letter to Region III, LER 81-017/01T-0. Therefore, no file search was specifically made in response to this set of interrogatories.

11. Attorney Robert Owen orally stated to the undersigned that he had learned from the Public Service Commission of Wisconsin that the Licensee intended to move high burnup assemblies to the outer perimeter of the reactor vessel of Point Beach Unit 1 and the low burnup assemblies to the center of the core in order to retard embrittlement of the reactor vessel wall.

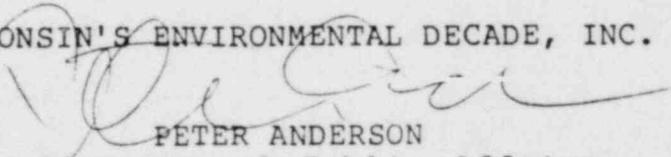
Production of Documents

See Qualification.

DATED at Madison, Wisconsin, this 8th day of December, 1981.

WISCONSIN'S ENVIRONMENTAL DECADE, INC.

By


PETER ANDERSON

Director of Public Affairs

Subscribed and sworn to before me
this 8th day of December, 1981.

Kathleen M. Kelly
Notary Public State of Wisconsin
My commission is permanent.