

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

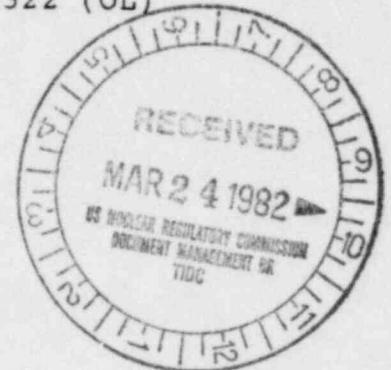
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Before the Atomic Safety and Licensing Board

In the Matter of)
)
LONG ISLAND LIGHTING COMPANY) Docket No. 50-322 (OL)
)
(Shoreham Nuclear Power Station,)
Unit 1))

RESPONSE OF SHOREHAM OPPONENTS
COALITION (SOC) TO LILCO DISCOVERY
REQUEST DATED FEBRUARY 23, 1982.



On February 23, 1982, LILCO served interrogatories on SOC and Suffolk County pertaining to contentions by both parties to which objections had not been taken. SOC hereby submits answers to those interrogatories as more fully set forth below.

The following interrogatories contained in LILCO's February 23rd filing were identical to both SOC and Suffolk County:

1. SOC interrogatories 1-27 equal Suffolk County 46-51;
2. SOC interrogatory 59 equals Suffolk County 31;
3. SOC interrogatories 60-61 equal Suffolk County 8.

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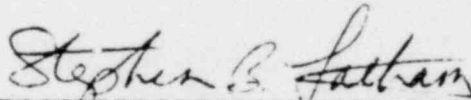
Answers to these interrogatories have been submitted by the attorneys and consultants for Suffolk County to LILCO pursuant to the discovery requests which pertained to Suffolk County. Accordingly, SOC has not resubmitted those answers as they pertain to the interrogatories to SOC since the answers are identical and the consultants are the same.

With regard to the balance of the interrogatories submitted by LILCO to SOC, SOC has endeavored to answer those interrogatories as fully as possible. However, a number of SOC's interrogatory responses pertain to contentions on which SOC has submitted interrogatories and requests for production of documents to LILCO and/or Staff and for which answers have not yet been received; which pertain to contentions which are as yet unresolved by Staff or were just recently resolved in SSER supplement 2; or which pertain to interrogatories submitted by SOC to LILCO and/or Staff on which SOC is seeking an Order from the Board to compel further answers. SOC intends to update its interrogatory answers provided by this submission as soon as possible after the receipt of materials previously requested from LILCO or Staff as set forth above.

SOC has endeavored to prepare these answers as expeditiously as possible given the time and resource constraints which have resulted from the recent Board

Orders in this proceeding. In the future, should SOC require additional time beyond that established by the Board or the regulations to comply with matters involved in this proceeding, a request for additional time will be made in timely fashion.

The parties should further note that SOC's answers to LILCO Interrogatories 39-51 and 55-58 have been prepared and were transmitted to SOC's attorneys by Express Mail. Those answers have not been received by SOC's attorneys and we are in the process of tracing their location. Duplicate copies are being sent to us for transmittal to the parties as expeditiously as possible.



Stephen B. Latham, Esq.

TWOMEY, LATHAM & SHEA
Attorneys for The Shoreham
Opponents Coalition
33 West Second Street
P.O. Box 398
Riverhead, N.Y. 11901

Dated: March 17, 1982

LILCO INTERROGATORIES

TO

SHOREHAM OPPONENTS' COALITION

SOC CONTENTION 9(a)

Interrogatory 28. Shouldn't "RBSWS" be "RBSVS" -- "V" standing for "Ventilation"?

Response 28. Yes.

SOC CONTENTION 9(b)

Interrogatory 29. Is SOC's concern limited to the primary containment? If not, define (a) the precise portions of the system in which SOC has an interest and (b) their location in the plant.

Response 29. Yes; in particular the air supply for the valves which would be needed for multiple or long term operation.

SOC CONTENTION 9(c)

Interrogatory 30. Is the "inadequate indication" in the main control room or at the RSP itself?

Response 30. The concern is with the lack of status indicators on the remote shutdown panel for power sources and equipment to be operated from the panel.

Interrogatory 31. Is SOC concerned about (a) the "systems and power sources" on the RSP or on something else? (b) Specify exactly (i) what systems and power sources and (ii) their locations if other than the RSP.

Response 31. (See answer to 30).

LILCO INTERROGATORIES

TO

SHOREHAM OPPONENTS' COALITION

SOC CONTENTION 16

Interrogatory 32. Identify for the introduction and each subpart of this contention, any documentary evidence supporting SOC's claims, as well as any other basis for them.

Response 32. The documentary evidence relied upon is the NUREG-0630 document, LILCO's response thereto, and the discussion in SSER-1.

SOC CONTENTION 16(a)(i)

Interrogatory 33. Please confirm that "peak centerline temperature" should be "peak clad temperature"?

Response 33. "Clad" is the correct term.

SOC CONTENTION 16a)(iii)

Interrogatory 34. Specify (a) why SOC thinks the analysis is "incomplete," and (b) what further analysis is necessary.

Response 34. It is our understanding that there has not yet been a complete analysis of factors which may increase PCT. This should be done to know the expected maximum.

SOC CONTENTION 16(a)(iv)

Interrogatory 35. (a) Quantify what SOC means by "a large degree of uncertainty," and (b) provide the basis for the quantification.

Response 35. When taking the difference of two large numbers, small percentage changes in the large numbers show up as a large percentage change in difference.

SOC CONTENTION 16 (Contd)

SOC CONTENTION 16(a)(v)

Interrogatory 36. Identify the "new thermal-hydraulic models."

Response 36. These are the revised analyses and assumptions used by G.E. to improve their thermal-hydraulic models. They are not entirely new models.

SOC CONTENTION 16(a)(vii)

Interrogatory 37. (a) Identify what SOC means by "the base case flow blockage," and (b) provide the basis for whatever definition SOC has in mind.

Response 37. It is our understanding that the "base case" refers to the base strain case used in the burst-strain sensitivity study. This is from NUREG-0630.

Interrogatory 38. (a) Identify "some of the cases analyzed" referred to, and (b) provide the basis of the identification

Response 38. Based on further review of the available documentation on the clad swell/flow blockage issue, Intervenor's are not planning to pursue item (vii) of Contention 16.

LILCO INTERROGATORIES

TO

SHOREHAM OPPONENTS' COALITION

SOC CONTENTION 19(d)(1)

Interrogatory 52. What portions of the reactor recirculation system does SOC think do not meet "the guidelines set forth in NUREG-0313, Revision 1"?

Response 52. It is our understanding that the large piping (28", 22" and 10") portions of the recirculation system are of 304 stainless steel. NUREG-0313, Rev. 1 specifies that such lines should be constructed of materials "demonstrated to be highly resistant to oxygen-assisted stress corrosion" in the as-installed condition. SS-304L meets this guideline but SS-304 does not. See SNRC-566 dated 5/15/81.

SOC CONTENTION 19(d)(2)

Interrogatory 53. What "inlet lines at the safe-end curves" is SOC referring to?

Response 53. This wording is taken directly from exceptions to Part 3, NUREG-0313, Rev. 1, described in LILCO's 5/15/81 letter, SNRC-566. SOC is referring to the exception identified by LILCO.

SOC CONTENTION 19(d)(3)

Interrogatory 54. Please explain what is meant by " [t|he limiting conditions for leakage...has not been demonstrated." What has not been demonstrated? Please explain why SOC thinks the leak detection system may not enhance discovery of unidentified leakage.

Response 54. As indicated in SNRC-566, the Technical Specification leakage limits have not yet been submitted. SNRC-566 further implies that the

SOC CONTENTION 19(d)(3) (Contd)

NUREG-0313, Rev. 1 limits may not be met ("we believe a change in limiting conditions leakage is not warranted..." SNRC-566, pg. 2). SOC assumes that the latest requirements, therefore, may not be met by LILCO.

LILCO INTERROGATORIES

TO

SHOREHAM OPPONENTS' COALITION

- Interrogatory 62. Doesn't attachment I to SNRC-535 (March 5, 1981) show that Shoreham satisfies Regulatory Guide 1.100?
- Interrogatory 63. If not, (a) what aspects of Regulatory Guide 1.100 have not been met at Shoreham in SOC's opinion, and (b) what is the safety significance of such noncompliance?

Responses to
62 and 63.

The letter from Schwencer of the NRC staff to Pollock of LILCO dated February 26, 1982, documents that the NRC still has open questions regarding the adequacy of the Shoreham seismic qualification program. In addition, the NRC staff review of equipment seismic qualification is identified as an open issue (SER, Suppl 1, at pp. 1-4 and 3-4). Compliance with the regulatory requirements including Regulatory Guide 1.100, will be assessed during the staff's forthcoming second Seismic Qualification Review Team (SQRT) audit. Thus, Shoreham equipment has not yet been shown as meeting Regulatory Guide 1.100. The safety significance of such noncompliance is that equipment important to safety has not been demonstrated as being operable during and following the occurrence of the Shoreham SSE (also see Response 60 and 61).

LILCO INTERROGATORIES
TO
SHOREHAM OPPONENTS' COALITION

SOC CONTENTION 19(j)

Interrogatory 64. What does SOC suggest be done to remedy the "unfavorable" turbine orientation?

Response 64. It should be corrected so as to reduce the risk to the lowest practicable level. Specific fixes are the responsibility of the Applicant.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DO NOT WRITE IN THESE SPACES

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power
Station, Unit 1)

Docket No. 50-322 O.L.

AFFIDAVIT OF

DALE G. BRIDENBAUGH AND GREGORY C. MINOR

FOR SHOREHAM OPPONENTS' COALITION

DALE G. BRIDENBAUGH AND GREGORY C. MINOR, being duly sworn, do say under oath that I, the undersigned, have assisted in preparing and reviewing responses of Shoreham Opponents' Coalition to Long Island Lighting Company's Interrogatories Nos. 1-38, 52-54 and 64. Said answers are true and correct to the best of my knowledge and belief.

Dale G. Bridenbaugh

Dale G. Bridenbaugh

Gregory C. Minor

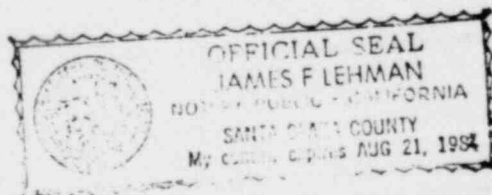
Gregory C. Minor

March 16, 1982

Subscribed and sworn to before
me this 16 day of MARCH, 1982.

James F. Lehman
NOTARY PUBLIC

My commission expires: 5/21/84



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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In the Matter of)
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LONG ISLAND LIGHTING COMPANY)
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(Shoreham Nuclear Power Station,)
Unit 1))
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Docket No. 50-322 O.L.

AFFIDAVIT OF RICHARD B. HUBBARD

The undersigned states under oath that he has reviewed and assisted in preparing the following S.O.C. answers to LILCO Interrogatories 39-51, and 55-63.

To the best of my knowledge and belief, the foregoing is true and correct.

Richard B. Hubbard

DISTRICT OF COLUMBIA:

Subscribed and sworn to before me
this 16th day of March 1982.

Reneé Giff