

04/15/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CLEVELAND ELECTRIC ILLUMINATING)	Docket Nos. 50-440
COMPANY, <u>et al.</u>)	50-441
)	(Operating License)
(Perry Nuclear Power Plant)	
Units 1 and 2))	

NRC STAFF'S FIRST SET OF INTERROGATORIES TO INTERVENORS
OHIO CITIZENS FOR RESPONSIBLE ENERGY AND SUNFLOWER ALLIANCE

In accordance with the Licensing Board's Memorandum and Order of September 9, 1981, (LBP-81-35, 14 NRC 682) these interrogatories are being served upon Ohio Citizens for Responsible Energy (OCRE) as lead intervenor on Issue No. 5 (Scram Discharge Volume Pipe Break) and upon Sunflower Alliance ("Sunflower") as the other participating intervenor on that issue. See LBP-81-24, 14 NRC 175, at 217 (1981). As indicated by the Licensing Board, OCRE should coordinate the responses to this discovery. If Sunflower simply adopts OCRE's response, it may so indicate in writing. Otherwise, we would expect Sunflower to file separate substantive responses. Copies of the documents referenced in these interrogatories (NEDO-24342 and NUREG-0803) are enclosed.

The interrogatories submitted herein are filed pursuant to 10 C.F.R. § 2.740b, which requires that the interrogatories be answered separately and fully in writing under oath or affirmation, within 14 days after service.

DESIGNATED ORIGINAL

Certified By

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INTERROGATORIES

Issue No. 5 (Scram Discharge Volume Pipe Break)

Interrogatory 1a

Does OCRE (Sunflower) agree with the conclusion in NUREG-0803 (at 2.2.1) that BWR 6/Mark III containment designs (e.g., Perry) fulfill the requirement of 10 C.F.R. Part 50, Appendix A, GDC 35?

Interrogatory 1b

If the answer to the preceding question is anything other than an unqualified yes, specify the bases for your answer.

Interrogatory 2a

Assuming that the Perry design fulfills the requirements of 10 C.F.R. Part 50, Appendix A, GDC 35, does OCRE (Sunflower) contend that the Perry design nevertheless provides insufficient assurance of adequate core cooling in the event of Scram Discharge Volume pipe breaks?

Interrogatory 2b

If your answer to Interrogatory 2a is other than an unqualified no, specify the bases for your answer and any NRC criteria not met by the Perry facility insofar as SDV pipe breaks are concerned.

Interrogatory 3a

Does OCRE (Sunflower) agree with the conclusion of NEDO-24342, at A-13, that "the ECCS pumps in the Mark III plant cannot be affected by the SDV rupture...."?

Interrogatory 3b

If your answer is anything other than an unqualified yes, specify the bases for your answer.

Interrogatory 4a

Do you agree that any break in the Scram Discharge Volume piping is bounded by other small break LOCA's analyzed for determining compliance with 10 C.F.R. § 50.46. NEDO-24342, Section 8.5; NUREG-0803, Section 2.2.1.

Interrogatory 4b

If your answer is other than an unqualified yes, specify the bases for your answer.

Respectfully submitted,

Stephen H. Lewis

Stephen H. Lewis
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 15th day of April, 1982

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-440
50-441

Notice is hereby given that the undersigned attorney herewith enters an appearance in the above-captioned matter. In accordance with 10 C.F.R. § 2.713(a), the following information is provided:

Respectfully submitted,

Stephen H. Lewis
Counsel for NRC Staff

Dated in Bethesda, Maryland
this 15th day of April, 1982

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-440 OL
50-441 OL

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF'S FIRST SET OF INTERROGATORIES TO INTERVENORS OHIO CITIZENS FOR RESPONSIBLE ENERGY AND SUNFLOWER ALLIANCE" and "NOTICE OF APPEARANCE" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, this 15th day of April, 1982:

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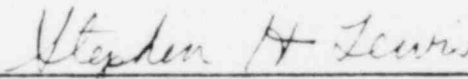
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