9/29/78

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

In the Matter of	)	Docket No. 50-409
	)	Amendment to
DAIRYLAND POWER COOPERATIVE	)	Provisional Operating
	)	License No. DPR-45
(La Crosse Boiling Water Reactor)	)	

APPLICANT'S INTERROGATORIES TO
COULEE REGION ENERGY COALITION

Pursuant to 10 CFR § 2.740b, Dairyland Power Cooperative (Dairyland), the applicant for an amendment to Provisional Operating License No. DPR-45 in the above-captioned proceeding, hereby propounds the following interrogatories to be answered by the Coulee Region Energy Coalition (CREC) within fourteen (14) days, in writing and under oath.

These interrogatories are continuing in nature and must be supplemented by CREC to include information thereafter acquired in accordance with the requirements of 10 CFR § 2.740(e).

1. Please state the name and address of each person whom you have engaged or utilized to conduct any reviews, analyses, tests, or studies related to each of the four CREC contentions admitted as matters in controversy

in this proceeding by the Licensing Board and listed in Appendix A to the Board's September 5, 1978 Prehearing Conference Orders, and as to each such person please provide the following:

(a) his or her professional qualifications, by way of education and/or experience, as applicable;

(b) the subject matter of each such review, analysis, test, or study;

(c) a description of each such review, analysis, test, or study and a summary of the results of same;

(d) a description and identification of any written reports prepared as a result of each such review, analysis, test, or study.

2. With respect to any individuals whom CREC intends to introduce as witnesses to testify on its behalf with regard to these contentions in any public hearings which may be held in this proceeding, please provide:

(a) their qualifications, particularly as they relate to these issues;

(b) all technical papers either written or published by them;

(c) all books written and/or published by them;

(d) all statements or testimony (both written and oral) given by them in other proceedings relating to these issues;

(e) all responses to interrogatories answered by them or responses which they assisted in the preparation of relating to these issues.

Contention 1

3. Identify each specific spent fuel storage pool component which CREC considers to be inadequately discussed in Dairyland's license amendment application from the standpoint of long-term integrity of the component. As to each such component, describe, in detail, the extent to which the discussion in the application is deficient and describe the specific mechanism or process by which this component would experience degradation.

4. Describe, in detail, the nature of the following phenomena and exactly how each will occur at the LACBWR spent fuel pool if this license amendment is granted and the proposed modifications are made in the SFP. Please describe the specific structural, mechanical, physical or other impacts

which the occurrence of these phenomena will have on the integrity of the SFP and the SFP components contained therein. As to each phenomena please provide any evidence, information, or data which CREC has showing that it will occur at LACBWR if the pool is modified as proposed.

(a) accelerated corrosion

(b) microstructural changes

(c) alterations in mechanical properties

(d) stress corrosion

(e) cracking

(f) intergranular corrosion

(g) hydrogen absorption and precipitation by the stainless steel alloys.

5. Please list and describe the specific sensitivity monitoring methods to identify defective fuel elements which CREC believes the Applicant should discuss. Describe, in detail, the processes by which leakage and disintegration of spent fuel and fuel cladding could occur in the LACBWR SFP and the manner in which CREC believes such processes could be or should be monitored.

6. List the specific reasons why CREC believes the Applicant should or should not monitor each individual spent fuel assembly.

7. Describe the various methods of which CREC is aware for encapsulating defective spent fuel elements as well as CREC's views on the effectiveness of each such method.

8. Describe, in detail, the correlation between crud layer thickness and corrosion of spent fuel and spent fuel cladding.

9. Describe, in detail, each specific "problem in handling spent fuel" which Applicant has not adequately analyzed. Describe, in detail, how each of these "problems" results from increased storage of fuel in the LACBWR SFP and state precisely why the Applicant's existing analysis is inadequate.

Contention 5

10. Describe, in detail, how the smaller cask drop area in Applicant's proposed design would create a threat to the safety of the public and maintenance workers. Please describe and quantify, if possible, the nature and extent of the incremental threat to safety associated with the proposed cask drop area in comparison with the existing cask drop area.

11. Describe, in detail, how the two-tier design increases the chances for, and potential magnitude of,

accidents in fuel handling and storage. Identify each specific accident about which CREC is concerned in this regard.

12. Describe each specific "problem" in the lower tier which CREC is concerned about and describe how the two-tier and higher density design makes detection of each such problem difficult. Identify each such problem which will be "impossible" to detect as a result of the two-tier design.

13. Describe, in detail, how the reduction of the level of water over the assemblies reduces the margin of safety for LOCA accidents in the SFP to an "unacceptable level." What level of water would CREC consider acceptable? Provide any detailed analyses or calculations which CREC has to support its assertions in this respect.

14. Describe, in detail, the bases for CREC's assertion that there will be increased maintenance exposures associated with an increase in the number of filter changes and resin volumes and intensities. Describe the nature and extent of these exposures in comparison with existing maintenance exposures at the plant.

Contention 6

15. Describe, in detail, how an increase in spent fuel in the LACBWR SFP would increase the risk of accidental releases to employees and the public in the event of a cask drop accident. Please provide any calculations, information, or other data which CREC possesses to support this contention.

Contention 7

16. Describe, in detail, how the presence of failed fuel rods in the SFP results in (a) more dangerous storage life, (b) shortened storage life, and (c) increased storage costs and precisely how the presence of failed fuel rods increases the threat to the environment and maintenance workers.

Respectfully submitted,

Kevin P. Gallen

for O. S. Hiestand
Attorney for
Dairyland Power Cooperative

Of Counsel

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Dated: September 29, 1978

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CERTIFICATE OF SERVICE

Service has on this day been effected by personal delivery or first class mail on the following persons:

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Dated: September 29, 1978