UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

PORTLAND GENERAL ELECTRIC COMPANY,

(Trojan Nuclear Plant)

Docket No. 50-344

(Control Building Proceeding)

10/12/18

COALITION FOR SAFE POWER AND EUGENE ROSOLIE RESPONSE TO NRC INTERROGATORIES

S1. Yes.

(a) NRC Order dated May 26, 1978, page 5, where it is stated:

"...the NRC Staff has determined that there is adequate assurance of safety in the interim before the Control Building modifications in that, in the event of the occurrence of the SSE established for the facility, the facility has the capability to withstand such event and be brought to a safe shutdown condition. In addittion, the NRC Staff has determined that the facility may be operated during the interim period without endangering the health and safety of the public provided certain conditions are imposed...."

Safety evaluation.

- (b) For (a) 1 see Amendment to Petition to Intervene, dated July 23, 1978.
 For (a) 2 see (c).
- (c) In the same order it states on page 3:

 "The shear walls do not have the intended capacity to resist the Operation Basis Earthquake (OBE) nor the Safe Shutdown Earthquake (SSE),since they do not conform to the appropriate seimic design criteria of FSAR Sections 3.7, and 3.8 as referenced by FSAR Section 3.7.2.1...."

As for the safety evaluation, it is not that we disagree but rather we believe it to be inadequate. We have stated before, that this is a mere review of the Applicants documents and nothing more. To base any decision on this alone is biased and does not serve the public. I would refer the NRC Staff to a recent report by the Government Accounting Office (GAO). Althought this report deals mainly with NRC practices in regards to construction we have a similar situation here.

- El. We feel all consideration should be given to the requirements of the National Environmental Protection Act. If the NRC Staff feels after such consideration that an EIS is not needed we would not press the issue.
- E2. See Amended Petition to Intervene dated July 23, 1978.

(b) We do not question the impact of the license amendement or the modification. The impact we are concerned about is that which would occur if the plant is to

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operate under present conditions.

(c) The Control Building would be able to withstand the earthquake it was designed to withstand.

(d) WASH-740
WASH- 1400
The Risk of Nuclear Power Reactors, Union of Concerned Scientists, 1977

- Gl. (a) I-"Our investigation and analysis ...show that this occurrence does not constitute an unreviewed safety question nor require a license amendment." For our position see answer to S1 (c).
 - 2-"...because 5 percent damping is a reduction in the conservatism intended in our original OBE design, we would expect it to be allowed only until we have restored the original conservatism to the Control Building." p.3

 Reportable Occurrence. NRC has made certain requirements to operate the when it was licensed. To allow the operation of the plant now is to make those requirements arbitrary and the whole licensing process a mere joke.
 - 3-"... capability of the Control Building to withstand the Safe Shutdown Earthquake (SSE) has not been violated."" See answer to S1 (c).
 - 4-"...the acceptable margin of safety or safety limit is not being reduced."
 See answer to S1 (c)
 - 5-"Like wise, since the structure can still meet the regulatory design criteria, no substantial safety hazard exists." See answer to S1 (c).
 - (b) none at this time.
 - (c) "The staff concluded, on the basis of the oral presentation, that the techevaluation by Bechtel indicated that approval of an interim operating
 period seemed likely without further modification of the plant,..."
 Obviously the Staff was merely going on the word of Bechtel and feel any
 judgement based on that alone is not very sound.
 - (d) none at this time.
 - (e) none at this time.
 - G2. (a) The SSE is defined in 10 CFR 100, App A.
 - (b) No.
 - (c) A need for the plant and that any work will not interfere with the operation of the plant.
 - (d) As to the need for the plant, it is our reasoning that if the plant is not needed it would be in the best interest of the public health and safety not to operate the plant. We also believe that work on the Control Building must not interfere with the plants operation and to minimize such interference it would be best to keep the plant shutdown.

- G3 (a) Those outlined by the Applicant and the NRC staff.
 - (b) We have not separately evaluated the precise significance of each mistake, but believe the accumulated effect is important.
- G8 All material submitted by parties in this proceeding.

One in the Spirit

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Coalition For Safe Power

Dated this day, 12th of October, 1978

UNITED STATES OF AMERICA RELATED CORRESPONDED

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING

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Docket No. 50 44 10 00 Proceeding)

CERTIFICATE OF SERVICE

I hereby certify that copies of "COALITION FOR SAFE POWER AND EUGENE ROSOLIE RESPONSE TO NRC INTERROGATORIES" in the above-captioned proceeding have been served on the following by deposit in the United States mail, ffirst class this 12th day of October, 1978:

Marshall E. Miller, Esq., Chairman Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dr. Kenneth A. McCollom, Dean Division of Engineering, Architecture and Technology Oklahoma State University Stillwater, Oklahoma 74074

Dr. Hugh C. Paxton 1229 - 41st Street Los Alamos, New Mexico 87544

Joseph R. Gray, Esq.
Counsel for NRC Staff
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Columbia County Courthouse Law Library Circuit Court Room St. Helens, Oregon 97051

Ms. Nina Bell 632 S. E. 18th Street Portland, Oregon 97214 Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Atomic Safety and Licensing Appeal Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Robert M. Johnson, Esq. Assistant Attorney General 100 State Office Building Salem, Oregon 97310

Robert Lowenstein, Esq. Lowenstein, Newman, Reis & Axelrad Suite 1214 1025 Connecticut Ave., N. W. Washington, D. C. 20036

H. H. Phillips, Esq.
Portland General Electric Company
121 S.W. Salmon Street
Portland, Oregon 97204

Mr. Stephen M. Willingham 555 N. Tomahawk Drive Portland, Oregon 97217

CERTIFICATE OF SERVICE

Columbia Environmental Council P. O. Box 611 St. Helens, Oregon 97051

Mr. John A. Kullberg Route I, Box 250Q Sauvie Island, Oregon 97231

Mr. David B. McCoy 348 Hussey Lane Grants Pass, Oregon 97526

Ms. C. Gail Parson P. O. Box 1852 Kodiak, Alaska 99615

Docketing and Service Section Office of the Secretary U. S. Nuclear Regulatory Commission Washington, D. C. 20555 John H. Socolofsky, Esq. Assistant Attorney General Of Attorneys for the State of Oregon 100 State Office Building Salem, Oregon 97310

Gregory Kafoury, Esq.
Counsel for Columbia Environmental
Council
202 Oregon Pioneer Building
320 S. W. Stark
Portland, Oregon 97204

William Kinsey, Esq.
Bonneville Power Administration
P. O. Box 3621
Portland, Oregon 97208

Eugene Rosolie

Coalition For Safe Power