

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
NRC PUBLIC DOCUMENT ROOM



In the Matter of )  
DAIRYLAND POWER COOPERATIVE )  
(La Crosse Boiling Water Reactor) )

Docket No. 50-409  
Amendment to Provisional  
Operating License (SFP)

INTERVENOR COULEE REGION ENERGY COALITION'S ANSWERS  
TO NRC STAFF INTERROGATORIES TO INTERVENORS OF SEPT. 25, 1978

1. Intervenor Coulee Region Energy Coalition will require more time to collect the materials required to answer this question.
2. Refer to Question 19 of set number 2 of CREC interrogatories. Include also transfer gate seal as a component. The specific physical mechanism by which these components can be degraded and/or corroded by the radiation in the pool is not presently known to CREC. However, Applicant has not shown there won't be degradation and corrosion, and since we will, as local residents, be left with the mess, we feel Applicant should thoroughly investigate these possibilities before making the problem worse.
3. Refer to NUREG-0404 Vol. 2, p. 23. NRC Draft Generic EIS on handling and storage of spent light water power reactor fuel states that these corrosion effects in underwater spent fuel storage require examination.
4. Intervenor is not prepared to answer question 4 at this time.
5. Individual assemblies are already grossly failed, and individual problems can and have occurred. CREC wants to prevent for the future such past problems as LACSWR's operation of the reactor for months on grossly failed fuel rods, finally "discovering" the failure,

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drop accident. Cleaning up after a cask drop accident will inevitably increase plant employee exposure and radioactive releases, whether planned or unplanned, and any such increase in radioactive releases is a threat to the public.

14. According to Appendix D of the Draft Generic EIS on Handling and Storage of Spent Light Water Reactor Fuel, there are additional factors which bear upon selection of a storage expansion system (5): To reduce pool surface radiation in two-tier stacking of spent fuel, the older fuel with long storage is in the upper racks. This will involve the "juggling of fuel assemblies" during reactor core off load to put the newest spent fuel in the bottom rack, and the older fuel in the upper rack. Increased handling means increased risks, especially considering the presence of grossly failed fuel assemblies, which may further grossly fail during handling, as happened at the end of Cycle 4.

15. A) More fuel handling as stated in answer to Question 14.  
B) Detection of problems in lower tier.  
C) Retrieval of foreign objects dropped into pool, i.e. Charlie's lunch box.  
D) Raising of water level in pool, increased dependence on fuel transfer gate seal, water level being raised 19 feet above outlet pipe of pool cooling system.

16. CREC has not been reasonably assured by Applicant that detection of problems in the lower tier will be probable, much less possible.

17. Not applicable due to change by Applicant in projected coolant level with second tier installed. However, saturation time is reduced with less water, and therefore Applicant's ability to avert consequences

corrosion, radiation and unforeseen difficulties.

24. Failed fuel allows water and corrosion to work on both the interior and exterior surfaces of the fuel rod. The result is more corrosion in a shorter period of time, further decreasing failed rod integrity and shortening storage life.

25. More problems, (as per NUREG 0032) mean higher costs.

26. CREC does not have these figures. Dairyland Power Cooperative has some figures of this nature, including an 8% inflation rate that reflects the economy as a whole, and not the higher rates of inflation that have pervaded most facets of the nuclear industry.

27. NUREG 0032, p. 28, increased problems mean more maintenance. More maintenance means more exposures. More exposures mean more danger to the area's genetic pool.

It should be noted that Applicant has not fully answered Set #1 questions such as "if not, why not". Also, requests for-man-rem doses of various activities, have not been supplied as requested. For these reasons, as well as the limited resources available to CREC, the above responses to questions are subject to amendment as CREC acquires more information.

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Certificate of Service

Service has on this day been effected by personal delivery of  
First Class mail on the following persons:

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Signed

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Dated

*Oct 27, 1978*

