UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	§	
	§	
HOUSTON LIGHTING & POWER COMPANY	§	Docket No. 50-466
	§	
(Allens Creek Nuclear Generating Station, Unit No. 1)	§	

APPLICANT'S MOTION FOR SUMMARY DISPOSITION ON INTERVENOR DOHERTY'S CONTENTION NO. 5

Applicant moves the Board under 10 CFR § 2.749 to grant summary disposition with respect to Intervenor Doherty's Contention No. 5 relating to Suppression Pool Swell. As shown in the accompanying statement of material facts as to which there is no genuine issue to be heard, and the affidavits of Peter Stancavage, Raymond Sullivan and Robert Cheng, there is no issue to try in this proceeding, and Applicant is entitled under § 2.749 to have the Contention summarily dismissed as a matter of law.

The Contention

Doherty's Contention No. 5 states:

> In the event of blowdown, loss of coolant, reactivity initiated or other accident, the location of the Control Rod Drive Mechanism Hydraulic Unit as

planned in ACNGS, as well as the Traversing In-Core Probe makes these two systems vulnerable to suppression pool uplift. There are no Mark-III containment systems in operation today, and no full-scale tests have been done to guard against this possibility. Petitioners contend plant is endangered in the event such accidents destroy these systems when they are needed.

Argument

Intervenor Doherty's concern in this contention is that the Applicant's NSSS vendor and architect-engineer have not analyzed and designed ACNGS to account for the effect on the Hydraulic Control Units (HCUs) and the Transvering In-Core Probe (TIP) of the phenomenon known as Suppression Pool swell. The attached affidavits of Peter Stancavage of General Electric, and Raymond Sullivan and Robert Cheng of Ebasco Services Incorporated, along with the statement of material facts as to which there is no genuine issue to be heard, all demonstrate that Suppression Pool swell has been extensively studied and the equipment in issue will be designed to withstand the effects of this quantified phenomenon.

General Electric has performed numerous full-scale and sub-scale tests to determine the loadings imparted on in-containment equipment by the pool swell phenomenon. These tests have enabled General Electric to calculate the types and magnitudes of the loads imparted to equipment located

above the Suppression Pool. The pool swell phenomenon has been studied in considerable detail over many years and its effects are well known and documented.

From its extensive tests, General Electric has determined the maximum height of the worst-case "bulk" pool swell zone, and has advised the architect-engineer to design its in-containment equipment with this maximum height in mind. Since large, flat, platforms like the HCU floors will completely stop the rising pool, and thus incur greater loadings, the architect-engineer has located the HCU platform above the bulk pool swell zone. Furthermore, the HCU floors and the units themselves will be designed to withstand the "drag" loads that exist above the bulk pool swell zone, so that they will not be damaged during a pool swell event.

The Transversing In-Core Probe (TIP) is a movable radiation source used to calibrate the Local Power Range Monitors when the reactor is shut down. It is not designed or used to perform any safety function, and its ability to survive a LOCA has no safety significance. In any event, the TIP rests on a concrete platform cantilevering outward from the drywell wall at an elevation of about 6 feet above the normal height of the Suppression Pool. The bulk pool swell impact on the TIP station should be very small, or non-

existent, because the bottom surface of the platform will be sloped to function as a deflector.

For all these reasons, no genuine issue exists on any matter material to Doherty's Contention No. 5, and Applicant is entitled to a favorable decision as a matter of law.