

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. 13

Applicant moves the Board under 10 CFR § 2.749 to grant summary disposition with respect to Intervenor Doherty's Contention No. 13 relating to operation of the ECCS pump strainer assemblies. As shown in the accompanying statement of material facts as to which there is no genuine issue to be heard, and the affidavit of Walter F. Malec, there is no genuine issue to try in this proceeding and Applicant is entitled to have the Contention summarily dismissed as a matter of law.

The Contention

Doherty's Contention No. 13 states:

Intervenor contends Applicant's Containment Emergency Sump Pump will not function reliably because during a loss of coolant accident (LOCA) thermal shielding and insulation may be ripped off

or otherwise released or separated from in-containment building piping where it would block off the drain of water, preventing it from being recirculated for cooling by the sump pump, and this would degrade the effectiveness of the Emergency Core Cooling System (ECCS). This would endanger Intervenor's health and safety. This issue has been part of Task No. C-3 in the Office of Nuclear Reactor Regulation as "Insulation Usage Within Containment." Since issues have been raised by Staff on Applicant's ultimate Heat Sink, and ACNGS will be the largest BWR in the nation when completed, failure of ECCS function due to sump pump water blockage is of particular concern.

#### Argument

Intervenor Doherty's concern in this Contention is that thermal shielding and insulation may be separated from containment piping during a LOCA and cause ECCS pump suction lines to become blocked, thereby impeding ECCS flow.

The ECCS strainer assemblies which are attached to each of the ECCS pumps suction lines are conservatively designed and located to prevent the migration of insulation or any other particles in the suppression pool. The various design measures described in the accompanying affidavit make it virtually impossible that enough particulate matter could enter the ECCS system to impede ECCS coolant flow in the event of a LOCA.

Furthermore, the Applicant will use only metallic reflective insulation for piping in the drywell area. This insulation type is the least likely to break into small

pieces if separated from drywell piping during a LOCA. The small amounts of other insulation types used in the containment will only be used on piping in areas removed from the drywell and separated by partial and/or complete barriers. It is extremely unlikely that this other insulation material could find its way to the Suppression Pool after any postulated LOCA. Applicant has also taken steps in accordance with Regulatory Guide 1.54 to minimize the possibility that coatings or painting on containment pipes could block the ECCS strainers.

Accordingly, Doherty Contention 13 does not raise a genuine issue of material fact to be heard and Applicant is entitled to a favorable decision as a matter of law.