

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)	§	

Material Facts As To Which
There Is No Genuine Issue To Be Heard

(1) Several nuclear steam supply systems at ACNGS employ stainless steel piping and/or components for various reasons. These systems are: recirculation loop, control rod drive, hydraulic control units, fuel pool cooling systems, standby liquid control system lines, and reactor pressure vessel head ventline.

(2) None of these systems will employ a protective coating of any kind. (Affidavit, p. 2)

(3) All of the stainless steel components used at ACNGS will be cleaned after installation but prior to operation of the plant in complete accordance with the provisions of Regulatory Guide 1.37, "Quality Assurance Requirements for Cleaning of Fluid Systems and Associated Components of Water-Cooled Nuclear Power Plants." (Affidavit, p. 2)

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(4) General Electric does not take exception to any provision in Regulatory Guide 1.54 ("Quality Assurance Requirements for Protective Coatings Applied to Nuclear Power Plants") which pertains to the cleaning or coating of stainless steel. (Affidavit, p. 2).

Doherty Contention No. 43/
Stainless Steel Cleaning

COST \$ _____
PAID BY PLF. DEF.

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF:
HOUSTON LIGHTING AND
POWER COMPANY, (ALLENS
CREEK NUCLEAR GENERATING
STATION, UNIT 1)

Docket No. 50-466

DEPOSITION OF:

JOHN F. DOHERTY



International 266
Court Reporters, Inc.

1 A. There are some parts where it could, but
2 some parts it couldn't.

3 MR. NEWMAN: It would be impossible
4 to duplicate that accident?

5 A. If you mean duplicate in the sense of
6 xerox it, you're right.

7 Q. (BY MR. BIDDLE): Would you turn to your
8 contention number 43 on coatings and cleaning?
9 Which of the compounds prohibited by reg. guide
10 1.54 will be used at Allens Creek to coat
11 stainless steel components?

12 A. I don't know the names of any of these
13 materials right now.

14 Q. You listed a number of compound
15 components in your contention, did you not?

16 A. Yes.

17 Q. You contend that all of those compounds
18 were used in the coatings for stainless steel at
19 Allens Creek?

20 A. Apparently they had been used before in
21 coatings or they wouldn't have been mentioned as
22 not good to use.

23 Q. Would you answer my question, please?

24 A. Yes, what is that question again.

25 MR. BIDDLE: Would you read it,

1 please?

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(The question was read back by the reporter.)

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A. Well, all this is future. What I'm contending is that if the compounds do in fact contain these materials, that they have this hazard.

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Q. I don't think anyone will argue with you about that, Mr. Doherty. The question is: Which of these prohibited elements do you contend will be used to coat stainless steel at Allens Creek?

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A. Well, I filed the contention, I filed it under rather late conditions, September 14th and was not able at that time to find out which of these materials indeed would be. I have a letter from GE dated February 8th, 1977 which indicates GE will provide by April 29th, 1977, additional information regarding the quantity of unqualified coating materials for NSSS equipment located within the containment.

23

24

Q. What does that have to do with your contention?

25

A. That indicates to me that GE at that

1 time had unqualified coating materials.

2 Q. What is an unqualified coating material?

3 A. Evidently, it is materials listed in
4 three sections of regulatory guide 1.54.

5 Q. What three sections of reg. guide 1.54?

6 A. All right. If I've understood this
7 right, apparently that's not true. I have here
8 three sections without it saying in this letter
9 what those sections are. Now, they may be the
10 Standard Review Plan yes, they are the Standard
11 Review Plan, the three sections are 1.2.4, 6.3
12 and 6.6.

13 Q. Those are sections of what publication?

14 A. It's referred to as the Standard Review
15 Plan by the NRC.

16 Q. If we can return to my original question.

17 A. That indicates to me that there are
18 materials that don't meet Standard Review Plan or
19 there were at that time.

20 Q. What does that have to do with your
21 contention?

22 A. Allens Creek would be a GE plant, so
23 that unless these materials whichever they are
24 specifically are out of the NSSS, then there is
25 some problem.

1 Q. But you haven't indicated any
2 correlation between that Standard Review Plan or
3 reg. guide 1.54 and your contention.

4 A. Yes, that's right.

5 Q. Can you establish that connection?

6 A. I'll have to try, otherwise, there's no
7 contention.

8 Q. I would agree with you, sir.

9 A. That's right. Do you have a question?

10 Q. Yes. Is there any correlation between
11 the Standard Review Plan you made reference to,
12 sections of reg. guide 1.54, you made reference
13 to and this contention?

14 A. Well, I don't think there should be any
15 misunderstanding. I don't think I made any
16 reference to in the regulatory guide other than
17 to mention it. The Gessar listed two documents
18 which indicated that GE took exception to
19 regulatory guide 1.54.

20 Q. Do you have a document which states that
21 General Electric takes exception to the entirety
22 of reg. guide 1.54?

23 A. Apparently just the sections.

24 Q. Which sections of reg. guide 1.54 did GE
25 take exception to?

1 A. I don't know at this time. The reg.
2 guide is a page and a half in length.

3 Q. Are you familiar with reg. guide 1.54?

4 A. I have it in my hands here.

5 Q. Are you familiar with reg. guide 1.54?

6 A. No, I wouldn't say I was, but why don't
7 you ask a question.

8 Q. Is reg. guide 1.54 concerned with
9 matters other than those expressed in your
10 contention?

11 A. It may be. Well, it is concerned about
12 matters expressed in the contention.

13 Q. Has GE taken exception to that portion
14 of reg. guide 1.54 which may relate to the
15 subject matter of this contention?

16 A. On page A-5 of the Cessar NUREG 0152, it
17 indicates that GE has taken exception to the
18 provisions of the guide without saying which
19 provisions.

20 Q. Does it say that GE has taken exception
21 to each part and parcel of NUREG 1.54?

22 A. Regulatory guide 1.54, it says that
23 General Electric's position is to take exception
24 to the provisions of the regulatory guide.

25 Q. So it is your conclusion that GE has

1 taken exception to every part of reg. guide 1.54
2 and that's the basis of your contention?

3 A. You're putting words in my mouth.

4 Q. That's because there are no words coming
5 out of your mouth that help us to understand this
6 contention.

7 A. Well, please refrain from doing that. I
8 didn't say all sections. I don't have -- I've
9 done very little analysis on the contention, but --

10 Q. What is the basis of your contention?

11 A. Page A-5 of NUREG 0152.

12 Q. That's the sole basis?

13 A. If I had not seen that, I would not have
14 framed the contention.

15 Q. Therefore, it is the sole basis of your
16 contention?

17 A. I think that defines the basis.

18 Q. What is the title of reg. guide 1.54?

19 A. Quality assurance requirements for
20 protective coatings applied to water cooled
21 nuclear power plants.

22 Q. Which of the elements prohibited by reg.
23 guide 1.37 do you contend will be used to clean
24 stainless steel at Allens Creek?

25 A. I don't know that there is any of those

1 in reg. guide 1.38.

2 Q. Did you say that you know of none? The
3 question was, which of the elements prohibited by
4 reg. guide 1.37 will be used to clean stainless
5 steel at Allens Creek?

6 A. And I've not postulated anything about
7 reg. guide 1.37.

8 Q. You did postulate something about
9 cleaning of stainless steel, did you not?

10 A. Yes.

11 Q. This list of prohibited compounds that
12 are in your contention, did you mean to contend
13 that these are also prohibited from use in
14 cleaning compounds?

15 A. I believe they are prohibited from use
16 in cleaning compounds.

17 Q. Are you familiar with reg. guide 1.37?

18 A. No, I'm not familiar with reg. guide
19 1.37.

20 Q. Then, where did you derive your
21 contention on what should or should not be used
22 in the composition of cleaning compounds?

23 A. From reg. guide 1.54.

24 Q. Does reg. guide 1.54 have anything to do
25 with cleaning compounds?

1 A. It has to do about protective coatings.

2 Q. Then it doesn't have anything to do with
3 cleaning compounds?

4 A. 1.54 is about protective coatings. I
5 don't see anything here about --

6 Q. Is the basis for your contention as
7 regards cleaning compounds, the same as the basis
8 of your contention as regards coatings, which is
9 the supposed exception GE has made to that reg.
10 guide?

11 A. Reg. guide 1.54 does apply to cleaning
12 materials as well as coatings in page, on the
13 back page, Section C, Part Four. Coatings and
14 cleaning materials used with stainless steel
15 should not be compounded from or treated with
16 chemical compounds containing elements that that
17 could contribute to corrosion, intergranular
18 cracking or stress corrosion cracking. And it
19 lists a series of elements.

20 Q. Are those the same elements you've
21 listed in your contention?

22 A. Yes.

23 Q. So, is it correct that the sole basis
24 for your contention as it concerns cleaning and
25 coating compounds is the supposed exception

1 General Electric took to reg. guide 1.54?

2 A. Yes, and that was stated in the earlier
3 reference that I gave you.

4 MR. NEWMAN: If it were to be
5 established that none of the compounds identified
6 in your contention 43 are used to clean or coat
7 stainless steel components at Allens Creek, would
8 that then moot your contention?

9 A. Well, the contention lists some elements
10 and some, I've forgotten the term for that, some
11 salts, I guess, but Mr. Newman, if those were
12 removed, yes, that would remove the basis.

13 Q. (BY MR. BIDDLE): Would you turn to your
14 contention 44?

15 A. Incidentally, I'm not an expert on
16 cleaning compounds. 44?

17 Q. Yes. What is water hammer?

18 A. My understanding of it is that it's a
19 force that emerges when steam condenses in piping
20 that normally carries steam and then in some way
21 is moved. In other words, water sitting in a
22 pipe and the pipe is meant to carry steam and it
23 can move as water in the event the system starts
24 operating, that pipe starts in use.

25 If the pipe were sitting idle, for