

Argument

In Contention No. 17 Intervenor McCorkle alleges that the ACNGS containment is designed to allow 20 percent of the leakage to bypass the filtration systems. As the attached affidavit demonstrates, the containment design does not allow 20 percent of leakage to bypass the filtration system. Intervenor's concern apparently stems from an outdated statement in the original SER Section 6.2.3, p. 6-29. (Deposition Tr. 26) This statement, however, does not reflect the design modifications to the ACNGS leakage prevention systems described in PSAR Section 15 and Appendix 15A. As the attached Affidavit demonstrates, unfiltered containment leakage will be far below the percentage alleged by the Intervenor.

The Applicant has analyzed the potential leakage pathways through containment penetrations and, under design basis accident conditions, the amount of leakage which will be expected. The latter (the design leak rate) will be 0.5 percent by weight of the contained atmosphere per day at peak pressure. This will limit off-site doses in the event of an accident to well below 10 CFR Part 100 allowable limits. Applicant's analysis further estimates that, of the total amount of containment leakage, only .0195 percent per day of containment atmosphere will be unfiltered. This will result in total unfiltered containment leakage far below the 20% claimed by intervenor.

Finally, extensive pre-operational testing will be performed in accordance with the requirements of 10 CFR, Appendix J, to ensure actual containment leakage is within NRC requirements.

Accordingly, Intervenor McCorkle has not raised a genuine issue of material fact to be heard on this issue and Applicant is entitled to summary disposition as a matter of law.