

UNITED STATES OF AMERICA DOCKETED
NUCLEAR REGULATORY COMMISSION USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

02 JUL 72 11:50

In the Matter of
CONSUMERS POWER COMPANY

(Big Rock Point Nuclear Power Plant)

Docket No. 50-155-OLA
(Spent Fuel Pool
Modification)

JOHN O'NEILL'S MOTION CONCERNING THE 60 TON CASK

I move that the letter of agreement between the NRC staff and Consumers Power concerning the use of the 60 ton cask and the impact pad for the spent fuel pool be formalized, either as a technical specification to the operating license or incorporated into a board order concerning the cask drop contention discussion.

A Bektell report analyzing the consequences of a cask drop accident showed that the 60 ton cask should it fall would puncture the spent fuel pool lining and concrete. This report detailed certain modifications that should be made to make the use of this cask safe including the installation of an impact pad at the bottom of the spent fuel pool. The NRC staff and Consumers Power agreed that Consumers would not use the 60 ton cask unless the modification specified by the Bektell was implemented.

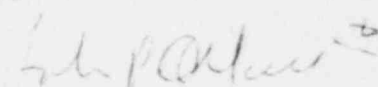
In this intervention, I raised the possibility of a cask dropping and puncturing the spent fuel pool. Because of the letter of agreement analysis of the possibility of such an accident was limited to casks weighing less than the 60 ton cask. I believe the heaviest cask analyzed was 24 tons.

The problem with this approach is that the letter of agreement is less formal, probably less binding, and more easily modified than a board order or technical specification to the operating license. I understand that this agreement can be modified solely by discussion between staff and the utility. Possibility of informal modification of this agreement undermines the public scrutiny that a possible cask drop accident received in this intervention process. To insure the integrity of that public scrutiny the conditions of this letter of agreement should be formalized by the board.

Trusting that Consumers Power and the staff are acting in good faith I anticipate no objection to this motion, although I have not been able to attempt to reach them for comment. If this motion is untimely, I request the board to consider it out of time. My hectic summer work load made it impossible to file this motion any earlier than now.

I support the findings of fact and law of Christa Maria, concerning Dr. Gay's G-flow model. I am troubled by the significant possible error between the small experimental pool and Big Rock's pool, the differences in heat sources, and his failure to model irregular R and D equipment that is sometimes stored in the pool. I concur with Mr. Sermmel's reasoning concerning rebuttal witnesses on the criticality contention.

FOR SAFE ENERGY
Sincerely,



Dated: July 6, 1982
All parties on the mailing list served.