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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)

PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.,)

(Seabrook Station Units 1 and 2))

) Docket Nos. 50-443
) 50-444

) July 26, 1982
)

NECNP CONTENTIONS REWORDED AT THE
SPECIAL PREHEARING CONFERENCE

During the Special Prehearing Conference of July 15-16, 1982, NECNP reworded several contentions in areas other than emergency planning to meet concerns raised by the Board and other parties. At the Board's request we have searched the transcript and set out the revised wording below:

I.A.1. NECNP contends that the Seabrook facility cannot be licensed because it does not meet the Commission's standards for environmental qualification of electrical equipment under 10 CFR Part 50, Appendix A, General Design Criterion (GDC) 4. The FSAR's discussion of environmental qualification is deficient in four respects: (1) the parameters of the relevant accident environment have not be identified; (2) the length of time the equipment must operate in the accident environment has not been included as a factor; (3) the methods used to qualify the

equipment are not adequate to give reasonable assurance that the equipment will remain operable; (4) the effects of aging and cumulative radiation exposure on the equipment have not been adequately considered. (Tr. at 314-315).

I.A.2. The Applicants have not complied with GDC 4 regarding qualification tests of electric valve operators installed inside the containment. (Tr. at 319).

I.A.3. The Applicants have not complied with GDC 4 in that they have not environmentally qualified electrical equipment inside the containment to withstand the effects of a hydrogen release and burn such as occurred at Three Mile Island Unit 2. (Tr. at 320-321).

I.B.1. This contention was not reworded at the conference. The language appears at page 6 of our filing of June 17, 1982.

I.B.2. This contention was not reworded at the conference. The language appears at page 7 of our filing of June 17, 1982.

I.C. This contention was not reworded at the conference. The language appears at page 13 of our filing of April 21, 1982.

I.D.1. The Applicants have not complied with GDC 1 with respect to ultrasonic testing of reactor vessel welds during pre-service and in-service examination. (Tr. at 330-331).

I.D.2. The Applicants' proposed testing of protection systems and actuation devices fails to meet the requirements of GDC 21 and NUREG-0737, Task II.D.1. In particular, the Applicants do not provide for the testing at full power of twelve safety functions (see FSAR at 1.8-9), justify that omission, or provide for other reliable means of testing them. (Tr. at 332).

I.D.3. The Applicants have not provided a reasonable assurance that the leakage detection system for the Seabrook reactor will operate when needed because not all of the system is to be tested during plant operation as required by GDC 21. Only the airborne radioactivity detector has the capacity to be tested during power operation. FSAR at 1.8-7. The Applicants also thereby fail to satisfy GDC 30, which requires the development of adequate leakage detection systems. (Tr. at 335).

I.D.4. The Applicants have not complied with GDC 21 in that the Applicants indicate compliance with an outdated standard, IEEE 338-1975, which has been superseded by IEEE 338-1977. Furthermore, the Applicants improperly assert that they do not comply with IEEE 338-1975 whenever the standard states that an action should be taken or a requirement should be met. All the provisions of the IEEE standard should be treated as mandatory unless the Applicants can show an alternative means of achieving the same level of safety.

I.E. The Applicants have not complied with GDC 4 in that the Applicants will not perform post-spin inspections of the flywheel, have not identified the design speed of the flywheel and tested it at 125% of that speed, and have not specified the cross-rolling ratio. Furthermore, the flywheel should be environmentally qualified under GDC 4 because it constitutes equipment important to safety. (Tr. at 343, with corrections to poor transcription based on page 19 of our filing of April 21, 1982).

I.F. The Applicants have not met the requirements of GDC 17 or Criterion III, App. B in that they have not indicated compliance with IEEE 323-1974. (Tr. at 348).

I.G. This contention was not reworded at the conference. The language appears at pages 12-13 of our filing of June 17, 1982.

I.H. The Applicants should be required to install additional heat exchanger capacity to allow for more rapid cooldown of the facility in the event of an accident. (Tr. at 350).

With respect to this contention, NECNP agreed to a Staff proposal that, to use Judge Paris' term, it "lie fallow" until the SER is issued, at which time it can be addressed in light of the Staff's handling of the relevant unresolved safety issue. (Tr. at 351-352).

I.I. NECNP contends that the Applicants must identify and environmentally qualify one path to cold shutdown as per I&E Bulletin 79-01B, Supplement 3. (Tr. at 353).

I.J. This contention cannot be framed until we have pursued the appropriate course of qualifying expert witnesses to review the security plan and determine its flaws. We will inform the Board shortly as to our intentions concerning the sabotage contention. (Tr. at 357-365).

I.K. This contention was withdrawn pending release of information from the Applicants concerning the Post-Accident Monitoring System. (Tr. at 365-368).

I.L. Applicants have not provided for a direct indication of Power Operated Relief Valve positions and, therefore, have not complied with NUREG-0737, Item II.D.3. A safety grade environmentally qualified system in compliance with GDC 4 should be installed. (Tr. at 368-369).

I.M. The Applicants' fire protection system does not meet the requirements of GDC 3 as implemented by the Commission in CLI-80-21 with respect to the following items:

- A. General Guidelines for Plant Protection
 - 1. Building design
 - a. cable spreading rooms
 - b. floor drains
 - c. floors, walls and ceilings
 - 2. Control of Combustibles
 - a. reactor coolant pump lube oil system
 - 3. Electric Cable Construction, Cable Trays and Cable Penetrations
 - a. cable spreading rooms
 - b. cable trays outside cable spreading rooms
 - c. control room cabling
 - 4. Ventilation
 - a. discharge of products of combustion
 - b. power supply and controls
 - c. protection of charcoal filters
 - d. stairwells
 - e. smoke and heat vents
 - 5. Lighting
 - a. fixed emergency lighting
- B. Fire Detection and Suppression
 - 1. Detection--alarm and annunciation

2. Water Sprinkler and Hose Standpipe Systems
 - a. sprinkler and standpipe layout
 - b. supervision of valves

C. Guidelines for Specific Plant Areas

1. Primary and secondary containment--normal operation
2. Control room
3. Cable spreading room
4. Switchgear rooms
5. Remote safety related panels
6. Diesel generator areas
7. Diesel fuel oil storage areas
8. Safety related pumps
9. New fuel area
10. Spent fuel pool area
11. Radwaste building
12. Decontamination areas

D. Special Protection Guidelines

1. Welding and cutting, acetylene-oxygen fuel gas systems
2. Storage areas for dry ion exchange resins

(Tr. at 369-373).

I.N. This contention was not reworded at the conference. The language appears at page 19 of our filing of June 17, 1982.

I.O.1. This contention was not reworded at the conference. The language appears at page 34 of our filing of April 21, 1982.

I.O.2. This contention was not reworded at the conference. The language appears at page 20 of our filing of June 17, 1982.

I.P. This contention was not reworded at the conference. The language appears at page 37 of our filing of April 21, 1982.

I.Q. The Applicants and the Staff have not applied an adequate methodology to Seabrook to analyze the reliability of systems, taking into account systems interactions and the classification and qualification of systems important to safety to determine what sequences of accidents should be considered within the design basis of the plant, and if so, whether the design basis of the plant in fact adequately protects against every such sequence. In particular, proper systematic methodology such as the fault tree and event tree logic approach of the IREP program or the systematic failure modes and effect analysis has not been applied to Seabrook. Absent such a methodological approach to defining the importance to safety of each piece of equipment, it is not possible to identify the items to which General Design Criteria 1, 2, 3, 4, 10, 13, 21, 22, 23, 24, 29, 35 and 37 apply. Thus it is not possible to demonstrate compliance with these criteria (Tr. at 386).

I.R. We have not reworded the contention as stated at page 42 of our filing of April 21, 1982. We seek a board ruling on that language. However, we press in the alternative a hydrogen control contention as set out at pages 24-25 of our filing of June 17, 1982. (Tr. at 399-407).

I.S. The Applicants have not yet designed or developed a loose parts detection system for the reactor's primary system and, therefore, do not satisfy Criteria 1 and 13 of Appendix A to 10 CFR Part 50, 10 CFR 50.36, or 10 CFR 20.1(c). (Tr. at 409).

I.T. This contention was not reworded at the conference. The language appears at page 47 of our filing of April 21, 1982.

I.U. The Applicants have not demonstrated that they meet GDC 4 of Appendix A to 10 CFR Part 50 in that they have not provided that structures, systems, and components important to safety be protected against the effects of turbine missiles whose launching might occur as a result of equipment failure. (Tr. at 418, with corrections to poor transcription based on language on page 49 of our filing of April 21, 1982).

I.V. The Applicants have not demonstrated that they have met GDC 14, 15, 31 and 32 insofar and to the extent that those GDC require a program for the inservice inspection of steam generator tubes. (Tr. at 419).

I.W. The Applicants have not demonstrated that they have adequately assured the seismic qualification of electrical equipment at Seabrook as required by Criterion III, "Design Control," of Appendix B to 10 CFR Part 50. (Tr. at 421).

II.A.2. This contention was not reworded at the conference. The language appears at page 55 of our April 21, 1982, filing.

II.A.2. NECNP contends that the Applicants have failed to meet the requirements of Appendix B with respect to the design and construction of Seabrook in the following areas such that

there is no assurance that the plant has been designed or constructed in accordance with applicable requirements and consistent with the public health and safety:

1. Acceptance of deficient conditions through apparent oversight or incompetence of inspectors.
I&E Report Nos. 79-05, 79-07, 79-10, 80-06, 80-10, 80-01, 81-09, 81-12, 80-13, 82-1.*/
Appendix B, Criteria II, V, X, XIV.
2. Acceptance of deficient conditions as a result of inadequate or nonexistent Quality Assurance procedures.
I&E Report Nos. 80-06, 80-04, 80-11, 81-01, 81-02, 81-03, 81-05, 81-07, 79-07, 79-06. Appendix B, Criteria II, V, XIV.
3. Failure to perform required inspections. I&E Report Nos. 79-06, 80-03. Appendix B, Criteria V, X.
4. Falsification of inspection record to show inspection was properly performed when it was not. I&E Report No. 79-06. Appendix B, Criteria II, X.
5. Failure to prevent deficiencies in pipe supports, pipe welds, and piping and tubing generally. I&E Report Nos. 80-06, 80-10, 81-03, 81-05, 81-14, 79-06. Appendix B, Criterion V.
6. Failure to determine the root causes of deficiencies or to assure that corrective actions are taken to prevent deficiencies from recurring. I&E Report Nos. 79-06, 79-09, 80-03, 80-11, 80-12, 81-03. Appendix B, Criterion XVI.

*/ All I&E Reports will be identified by reference to the report number for Unit 1, Docket No. 50-443, except as otherwise noted.

7. Failure to assure proper design. I&E Report Nos. 81-14, 81-05. Reports pursuant to 10 CFR 50.55(e), dated 10/27/78, 12/6/79 (three reports), 12/1/80, 7/17/81, 1/15/81, 2/23/81, 6/18/81, 8/25/81. Appendix B. Criteria III, V.
8. Failure to assure proper repairs. I&E Report Nos. 79-07, 80-04, 80-11, 80-12. Appendix B. Criteria V, IX, X.
9. Failure to assure deficiencies are not caused by poor contractor interface. I&E Report Nos. 80-11, 80-12, 81-12, 82-01. Appendix B, Criterion V.
10. Failure to assure the procurement of proper materials and failure to assure that procured items comply with all requirements. I&E Report Nos. 81-09, 81-12. Appendix B, Criteria V, VII, XV.
11. Failure to assure proper document control such that required changes are not made, and incorrect procedures and specifications are used. I&E Report Nos. 79-06, 80-03, 80-04, 80-11. Report pursuant to 10 CFR 50.55(e), dated 12/6/79. Appendix B, Criteria II, III, V, VI.
12. Pervasive deficiencies in welding and weld repairs. I&E Report Nos. 79-06, 79-07, 79-10, 80-03, 80-11, 80-10, 81-01, 81-03, 81-05, 81-09, 80-04, 80-11, 80-12. NRC Stop Work Order in letter dated 12/22/80. Appendix B, Criteria V, IX, X.

13. Inadequate audit program and inadequate commitment to and understanding of Quality Assurance. I&E Report Nos. 79-08, 78-06, 80-05, 81-12, 80-09, 78-16. Appendix B, Criteria I, II, XIII, XVIII.

II.B.1. This contention and subcontention were not reworded at the conference. The language appears at page 35 of our filing of June 17, 1982.

II.B.2. This subcontention was not reworded at the conference. The language appears at page 62 of our filing of April 21, 1982.

II.B.3. This subcontention was not reworded at the conference. The language appears at page 62 of our filing of April 21, 1982.

II.B.4. This subcontention was not reworded at the conference. The language appears at page 62 of our filing of April 21, 1982.

II.B.5. This subcontention was not reworded at the conference. The language appears at page 62 of our filing of April 21, 1982.

III. All emergency planning matters are addressed in a separate filing of July 23, 1982.

IV. This contention was not reworded at the conference. The language appears on the first page of our filing of June 17, 1982.

V. This contention was not reworded at the conference. The language appears on pages 4-5 of our filing of June 17, 1982, titled "NECNP's Supplemental Contentions"

Respectfully submitted,

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Date: July 26, 1982

CERTIFICATE OF SERVICE

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I, Diane Curran, hereby certify that copies of NECNP's foregoing CONTENTIONS RECORDED AT THE SPECIAL PREHEARING CONFERENCE were mailed first class, postage paid, this 26th day of July, 1982, to the following:

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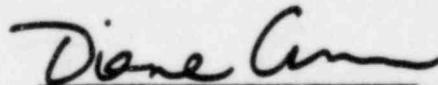
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