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February 15, 1983

Mr. Ivan W. Smith
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Board Panel
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Dr. Richard F. Cole
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: In The Matter of Commonwealth Edison
Company, Byron Station, Units 1 & 2
Docket Nos. 50-454 and 50-455

Dear Administrative Judges:

Enclosed please find copies of Commonwealth Edison Company's prefiled testimony on seismic, occupational exposure and water hammer contentions.

I am also enclosing a copy of the unexecuted stipulation concerning the final language and order of contentions. With the exception of Mr. David Thomas, the appropriate parties or their representatives have agreed to the terms of the stipulation. We have attempted to contact Mr. Thomas to receive his final approval, but thus far have been unable to do so. Based upon oral representations to me before he received this final draft, I believe Mr. Thomas agrees with the terms contained in this stipulation. Upon Mr. Thomas' confirmation, I will send the Board an executed copy of the stipulation.

Sincerely,

Alan P. Bielawski

Alan P. Bielawski
One of the Attorneys for
Commonwealth Edison Company

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In The Matter of)
)
)
COMMONWEALTH EDISON COMPANY) Docket Nos. 50-454 OL
) 50-455 OL
)
(Byron Nuclear Power Station,)
Units 1 & 2))

STIPULATION REGARDING ORDER
AND LANGUAGE OF CONTENTIONS

As requested by the Board in its January 14, 1983 "Memorandum and Order In Anticipation of Evidentiary Hearing", the parties, Commonwealth Edison Company, the NRC Staff, the Rockford League of Women Voters, and DAARE/SAFE agree and stipulate that the following constitutes the final language of contentions to be litigated in the upcoming operating license hearing. In addition, the parties agree and stipulate that they will endeavor to litigate these contentions in the order they are set forth below. Finally, for the convenience of the Board, the parties have estimated the number of hearing days which they anticipate will be required to litigate the contentions. The time estimates for contentions or groups of contentions are also set forth below.

The parties also agree to use their best efforts to provide the Board with the prefiled testimony, covering Steam Generators, Liquid Pathway, Emergency Planning and Quality Assurance contentions by February 22, 1983, but, in any event, no later than March 1, 1983.

CONTENTIONS

A. Seismology^{*/}

Time Estimate: 1 day (March 2)
Lead Intervenor: League

Alternate Contention 106

106. There exist serious seismic related site problems discovered subsequent to the construction permit herein which indicates that the seismic design for Byron is not such that there exist assurance that these problems are adequately resolved in accordance with applicable regulations, including but not limited to 10 CFR 50.57(a)(3)(i), 50.57 (a)(6) and 10 CFR Part 100, Appendix A. Specifically, the Rockford League of Women Voters contends that due to the lack of reliable information regarding the causes of earthquakes which have been experienced in northern Illinois, Edison should be required to perform strain gauge tests on faults cutting basement rock located in the northern Illinois

^{*/} The Staff has not had the opportunity to see the proposed language of alternative Contention 106. Contention 106 is the first issue scheduled for litigation and the Staff testimony is already written. The Staff objects to any alternative Contention 106 that expands the scope of existing Contention 106 at such a late date.

region where earthquakes of modified Mercalli VII or greater intensity are expected to occur. Further, recent evidence from the central portion of the United States shows that neither the Byron designated safe shut down earthquake peak ground acceleration value of 0.20(g) nor the operating basis earthquake peak ground acceleration value of 0.09(g) are sufficiently conservative. Ground acceleration significantly greater than both of these values are possible at the Byron site. In addition, it is not known if the recently discovered Plum River Fault is a capable fault. This fault is known to approach the Byron site within 5.3 miles and may even be closer if the fault extends further to the east.

Original Contention 106

106. In addition to the other seismic Contentions herein, serious seismic related site problems discovered subsequent to the construction permits herein indicate that the seismic design sequence for Byron is not such that there exists assurance that these problems are adequately resolved in accordance with applicable regulations including but not limited to 10 C.F.R. 50.57(a)(3)(i) and 50.57(a)(6). Specifically, without limiting the foregoing, there has been insufficient (or no) seismic analysis with respect to possible earthquakes and faults in the Byron area with respect to each of the East West Faults across Northern Illinois, and particularly the Sandwich and Plum River Faults. Recent information indicates that the Plum River Fault should be

considered a capable fault in accordance with Appendix A, III(g) of 10 C.F.R. Moreover, these problems raise the design question relating to seismology and ground acceleration and their effects of grouting upon the construction of large areas of Byron's foundation all below the water table. This is a serious design problem since C.E. has also failed to use strain gauge testing (or suitable alternatives) to predict the future movement of faults applicable or found during excavation and construction of the Byron site. C.E. did not, without objection from the Staff, do a particularized seismic and seismology study for the design of the Byron plant, but rather applied information taken from an inapplicable and fault analysis with respect to C.E.'s Braidwood plant. This in turn severely calls into question C.E.'s improper commitment to apply values for safe shutdown in the event of earthquakes due to maximum ground acceleration other than permitted by 10 C.F.R., Part 100, Appendix A; and the problems and issues raised herein are further exacerbated by the potential release of radiation without safe monitoring in the absence of decommission plans. There is also an absence of adequate seismic instrumentation for earthquake detection and particularly is this significant and important in light of the NRC's recent orders to shut down plants because of inadequate designs to control potential seismic problems. This is also one of the reasons why the Regulatory Staff has in its meetings with C.E. on

December 18 and 19, 1979, required an extensive review of Byron's overall design, and in particular the equipment components categorized as Category 1. While this issue may have been considered at the construction phase, that hearing was a sham and in any event new facts since the construction phase call into serious question that decision. As a result the applicable findings required by the Act, NEPA, and the Regs, cannot be made herein.

B. Water Hammer

Time Estimate: 1-1/2 days (March 3-4)
Lead Intervenor: DAARE/SAFE

Alternate DAARE/SAFE Contention 9a

During recent start-up tests at the KRSCO Plant in Yugoslavia, which has steam generators which are similar in design to those at Byron, the plant experienced a bubble collapse water hammer event in the feedwater bypass line. Applicant should be required to demonstrate that a similar event will not occur at Byron.

C. Occupational Exposure

Time Estimate: 4 days (March 7-11)
Lead Intervenor: League

League Contention 42

42. As the Staff has recognized in NUREG-0410 and in the Black Fox testimony previously cited, occupational

radiation exposure to station and contractor personnel has generally been increasing in recent years, and violation of the limits of 10 C.F.R. Part 20 has been avoided by C.E., as by other licensees, by obtaining the temporary services of transient workmen rather than by devoting adequate effort to reducing exposures. Among other things, this practice results in using larger numbers of people and thereby increasing the risk of sabotage, operator error and similar safety-related hazards. Furthermore, new information on low-level radiation effects indicates that the Byron design basis will not provide safe operation. Accordingly, both because of the lack of assurance that proper exposure levels will be maintained and because of the practice of using transient workers, as a result of this serious and unresolved problem the findings required by 10 C.F.R. §§ 50.57 (a) (3) (8) and 50.57 (a) (b) cannot be made.

League Contention 111^{*/}

111. C.E. has not met the requirements of NEPA and the Regs, including but not limited to 10 C.F.R. §§ 50.34(a) and 50.36(a) because C.E. has not adequately monitored and provided a design base for the Byron plant which will keep radiation levels as low as achievable as required for operation of the plant to protect the health and safety of the public. To keep radiation levels as low as achievable, C.D. should provide and utilize:

^{*/} The parties agree that only those portions of Contention 111 which pertain directly to in plant monitoring are issues in controversy in this proceeding.

A. More adequate environmental and discharge monitoring of radioactive emissions from the Byron plant, which include:

1. Monitoring devices at more locations within the plant site.
2. Provisions for more frequent reading of monitors by independent analysts.
3. Better monitoring devices which include:
 - a. An automatic system of monitoring that notifies local authorities by an alarm when discharge emission exceed design limits;
 - b. Monitoring devices that measure differences in alpha, beta and gamma levels, which presently are not proposed to be considered and measured;
 - c. Monitoring and recording of emissions of all dangerous long lived radionuclides, including especially I-129 and Plutonium;

B. More accurate calculation of design doses which can be accomplished by utilizing information from the improved monitoring suggested above and also by:

1. Providing for and constant update and replacement of equipment and analysis to respond to new experimental and analytical results. Byron was licensed for construction, for example, when some (including C.E.) asserted improperly that there was a threshold to radiation effects;
2. Including internal radiation doses caused by inhaled and/or ingested radionuclides which are deposited in different parts of the body where they give repeated radiation or until they are eliminated from the body; and
3. Including in the calculation, calculation of doses to people by utilizing actual radionuclides for and in food, animals, plants, soil, water, and in other parts of the environment in and around the Byron site.

As a result the applicable findings required by the Act, NEPA, and the Regs, cannot be made herein.

League Contention 112

112. C.E. has not met the requirements of NEPA and 10 C.F.R. Part 20 because it has not adequately assessed the effect of radiation on plant workers and provided a design base for the Byron plant which will provide radiation levels as low as achievable. To keep radiation levels as low as achievable there is a need for better use of preventive measures to reduce radiation, including neutron, exposure levels to regular plant personnel and transient workers. These include but are not limited to:

(a) Plant designs for reducing amount of radiation exposure which take into account new evidence on low levels of radiation which were not considered in design of the plant.

(b) Improved record keeping of radiation exposures, including cumulative exposures both at the plant site and at other facilities.

(c) Better training of personnel to prevent radiation exposures, including more use of regular trained personnel rather than transient or temporary workers with little experience and training.

(d) Limiting exposure to high levels of radiation to volunteers and/or only older workers beyond the child bearing age or others incapable of biological reproduction.

(e) Better education about radiation dangers to ensure cooperation of workers in keeping radiation exposures to a minimum.

As a result, the applicable findings required by the Act, NEPA, and the Regs, cannot be made herein.

D. Steam Generators

Time Estimate: 4 days (March 14-18)
Lead Intervenor: League

League Contention 22

22. An extremely serious problem occurring at other plants such as Consumers' Palisades plant and C.E.'s Zion plant, and likely to occur at C.E.'s Byron plant, is presented by degradation of steam generating tube integrity due to corrosion induced wastage, cracking, reduction in tube diameter, and vibration induced fatigue cracks. This affects, and may destroy, the capability of the degraded tubes to maintain their integrity, both during normal operation and under accident conditions, such as a LOCA or a main steam line break. The Commission Staff has correctly regarded this problem as a safety problem of a serious nature, as evidenced both by NUREG-0410 and the Black Fox testimony cited above. As a result of this serious and unresolved problem, the findings required by 10 C.F.R. § 50-57(a)(3)(i) and 50-57(a)(6) cannot be made.

DAARE/SAFE Contention 9(c)

9(c). Intervenors contend that there are many unresolved safety problems with clear health and safety implications and which are demonstrably applicable to the Byron Station design, but are not dealt with adequately in the FSAR. These issues include but are not limited to:

- c. Steam generator tube integrity. In PWRs steam generator tube integrity is subject to diminution by corrosion, cracking, denting and fatigue cracks. This constitutes a hazard both during normal operation and under accident conditions. Primary loop stress corrosion cracks will, of course, lead to radioactivity leaks into the secondary loop and thereby out of the containment. A possible solution to this problem could involve redesign of the steam generator, but at FSAR, Section 10.3.5.3 the Applicant notes its intent to deal with this as a maintenance problem, which may not be an adequate response given the instances noted in Contention 1, above.

E. Emergency Planning

Time Estimate: 4 days (March 21-25)
Lead Intervenor: DAARE/SAFE

League Contention 19

19. Recently discovered information indicates that the Advisory Committee on Reactor Safeguards conditioned

the acceptability of the present Byron site for the project on the existence of an effective evacuation system. However, no adequate evacuation plans exist, and since the Three Mile Island Accident ("TMI"), it has been acknowledged that neither Illinois nor C.E. have effective evacuation plans regarding Byron or even C.E.'s operating plants, such as, for example, Zion. Information gathered by C.E. during construction, during shift changes, and generally provided by Illinois' emergency preparedness officials show that evacuation regarding Byron in an acceptable time cannot be accomplished. Moreover, the events at TMI-2 showed the inadequacy of NRC emergency planning requirements. Emergency planning beyond the LPZ is a recognition of the residual risk associated with major reactor accidents whose consequences could exceed those associated with so-called design basis events. Such planning should be based on a worst case analysis of the potential accident consequences of a core melt with breach of containment. The public health and safety requires that there be in place prior to operation of Byron an effective will publicized and tested plan to evacuate the public in the event of such an accident. The Byron emergency plan is inadequate because it is not based on a weather-dependent worst case analysis of the potential consequences of a core melt with breach of containment. The public health and safety also requires that there be in place prior to operation of Byron an effective plan to evacuate the public in the event of such an accident and to

take other emergency measures because evacuation is or will be impractical in many affected areas. No such plans are, however, seriously planned or practically available. As a result, the findings required by 10 C.F.R. § 50.57(a)(3)(i) and § 50.57(a)(6) cannot be made.

League Contention 108

108. In addition to the other Contentions herein dealing with emergency preparedness, C.E.'s (as well as local, State, and applicable National authorities) emergency plans are inadequate in violation of applicable regulations, including but not limited to 10 C.F.R. Part 50, Appendix E, as implemented in part of NUREG-0396, for at least the following reasons:

(a) The agencies and C.E. have not made adequate plans for all of the areas which could potentially be at risk in a nuclear accident. Since studies of the AEC-NRC (including WASH-740) indicate that radiation releases could impact as far as 100 miles, and in light of the fact that radiation releases, both airborne and through ground water, from the accident of Three Mile Island impacted far beyond the LPZ, Byron emergency plans must account for an area including a radius of 100 miles from the plant site. Within this 100 miles include many substantial population centers (e.g., Chicago) within and without the State of Illinois (e.g., Rock County, Wisconsin).

(b) Applicant's plans do not at all take into account the social and economic costs as a result of evacuation as are set forth in the Illinois Emergency Plan revised as of 1979.

(c) Since there are no actual plans in operation they cannot be tested for verification of public responses.

(d) Emergency facilities (including both personnel and physical facilities) are not situated far enough from the Byron site so as to be free from any impact which could neutralize the effectiveness of such personnel and facilities in the event of an accident.

While this issue may have been considered at the construction phase, that hearing was a sham and in any event new facts since the construction phase call into serious question that decision. As a result the applicable findings required by the Act, NEPA, and the Regs, cannot be made herein.

DAARE/SAFE Contention 3

3. Intervenors contend that the FSAR does not adequately describe the elements set forth in 10 C.F.R. Part 50, Appendix E, IV, D as required by 10 C.F.R. Part 50, Appendix E, III, nor is the actual emergency plan presently planned to be used by Applicant in compliance with said criteria, so as to demonstrate that the Applicant's emergency plans for the Byron Station provide reasonable assurance that appropriate measures can and will be taken in the

event of an emergency to protect public health and safety and prevent damage to property. Intervenors further contend that Applicant's emergency plan for Byron is inadequate in that it fails to take into account any of the following factors, each of which must be factored into emergency plans for them to be meaningful and adequate:

- a. that the evacuation of the affected areas would necessitate the evacuation of more than twenty-thousand students attending Northern Illinois University in DeKalb, most of whom rely upon public transportation, or those without cars at other colleges in the affected areas.
- b. that, in the event of an acute gasoline shortage coinciding with the need for evacuation, contingency plans for evacuation of those otherwise able to transport themselves by means of gasoline-powered vehicles, including public transportation, would need to be transported by other means.
- c. that in the event of an accident requiring evacuation, there is no assurance that local and state and national authorities required to interface will in fact themselves have plans in place which adequately protect the affected public both within and without the LPZ.
- d. that in the event of an accident requiring evacuation, Applicant and others have plans in place to take emergency measures other than evacuation because evacuation is or may be impractical in many affected areas.

- e. that in the event evacuation is required, Applicant has no plans to deal with weather-dependent worst case analysis or the potential consequences of a core melt with breach of containment.

F. Liquid Pathway

Time Estimate: 2-1/2 days (March 28-30)
Lead Intervenor: League

Consolidated Contentions 39 and 109

Since the ground water system underlying the Byron site has not been characterized adequately, the consequences of radionuclide releases to the underlying aquifer cannot be predicted with confidence. In consequence, no proper NEPA analysis of this important subject can be made. In addition, as a result of this serious and unresolved problem the findings required by 10 C.F.R. 50.57(a)(3)(i), 50.57(a)(6), and 10 C.F.R. 50.34(b)(4) cannot be adequately made.

G. Class 9 Accidents

Time Estimate: 1-1/2 days (March 31 and April 1)
Lead Intervenor: League

League Contention 8

8. Neither C.E. nor the Staff has presented a meaningful assessment of the risks associated with the operation of the proposed Byron nuclear facility, contrary

to the requirements of 10 C.F.R. § 51.20(a) and § 51.20(d). Studies carried out by the NRC have identified accident mechanisms, considered credible, which would lead to uncontrollable accidents and release to the environment of appreciable fractions of a reactor's inventory of radioactive materials. Traditionally, these accident potentials have been downplayed or ignored on the basis of the Rasmussen Report. However, the Lewis Committee has now called into serious question the entire methodology, as well as the findings and conclusions, of the Rasmussen Report, which led the NRC to withdraw official reliance on the Rasmussen Report, yet the Staff still regulates upon the validity of the basic conclusions therein. In addition, NRC Staff studies, which are not common public knowledge, have cast doubt upon numerous of the specific conclusions of the Rasmussen Report. For example, in one secret NRC study, estimates of the "killing distance" were made, referring to the range over which lethal injuries would be received under varying weather conditions from the release of radioactive material in a nuclear power plant accident. Depending upon prevailing weather conditions, this "killing distance" was estimated to be up to several dozen miles from the accident-damaged reactor. Unpublished document from Brookhaven National Laboratory, USAEC. In addition, the Liquid Pathways Study, NUREG-0440 (February, 1978), highlights the incomplete safety assessment currently performed by the NRC, particularly

with respect to incomplete review of all credible accident sequences. A General Accounting Office report pertaining to that study criticizes the NRC's failure to consider core-melt accidents in assessments of relative differences in Class 9 risks. The March 7, 1978 letter from the NRC's Mr. Case to the Commissioners (Secy-78-137) also urges the inclusion of core-melt considerations in site comparisons in the case of sites involving high population density, such as Byron and the surrounding area in which live now (or at time of proposed operation) upwards of 500,000 persons. Moreover, neither C.E. nor the NRC Staff has presented an accurate assessment of the risks posed by operation of Byron, contrary to the requirements of 10 C.F.R. § 51.20(a) and § 51.20(d). The decision to issue the Byron construction permit did not, and the presently filed analysis of C.E. and the Staff do not, consider the consequences of so-called Class 9 accidents, particularly core meltdown with breach of containment. These accidents were deemed to have a low probability of occurrence. The Reactor Safety Study, WASH-1400, was an attempt to demonstrate that the actual risk from Class 9 accidents is very low. However, the Commission has stated that it "does not regard as reliable the Reactor Safety Study's numerical estimate of the overall risk of reactor accident." (NRC Statement of Risk Assessment and the Reactor Safety Study Report (WASH-1400) in Light of the Risk Assessment Review Group Report, January 18, 1979.) The withdrawal of NRC's endorsement of the Reactor Safety Study and its findings

leaves no technical basis for concluding that the actual risk is low enough to justify operation of Byron.

League Contention 62

62. The design of Byron does not provide protection against so-called "Class 9" accidents. There is no basis for concluding that such accidents are not credible. Indeed, the Staff has conceded that the accident at TMI falls within that classification. Therefore, there is not reasonable assurance that Byron can be operated without endangering the health and safety of the public. See also Contention 8, supra.

DAARE/SAFE Contention 2a

2a. Due to the concentration of nuclear power plants already in Northern Illinois; the applicant's record of incidents and violations in existing plants which have emerged since the granting of a Construction License for Byron; and the credibility which must now be given to large scale accident scenarios since TMI, Intervenors contend that the addition of Byron Station operations places an undue and unfair burden of risk from exposure to radioactive materials from accidental releases on DeKalb-Sycamore and Rockford area residents. With the addition of two more nuclear power units in operation at Byron, the potential for cumulative dose effects from discrete accident events at plants in Northern Illinois under unfavorable meteorological conditions poses an unreasonable level of risk to the health and safety of DeKalb-Sycamore and Rockford area residents.

H. Quality Assurance

Time Estimate: 5 days (April 11-15)
Lead Intervenor: DAARE/SAFE

League Contention 1A

1A. Intervenors contend that Edison does not have the ability or the willingness to comply with 10 C.F.R. Part 50, Appendix B, to maintain a quality assurance and quality control program, and to observe on a continuing and adequate basis the applicable quality control and quality assurance criteria and plans adopted pursuant thereto, as is evidenced by Edison's and its architect-engineers' and its contractors' past history of noncompliance at all Edison plants (whether or not now operating). In addition, Applicant's quality assurance program does not require sufficient independence of the quality assurance functions from other functions within the Company.

COMMONWEALTH EDISON COMPANY

NRC STAFF

By: _____

By: _____

ROCKFORD LEAGUE OF WOMEN VOTERS
ON OCCUPATIONAL EXPOSURE AND
STEAM GENERATOR CONTENTIONS

ROCKFORD LEAGUE OF WOMEN VOTERS
AND DAARE/SAFE ON QUALITY
ASSURANCE CONTENTION

By: _____

By: _____

ROCKFORD LEAGUE OF WOMEN VOTERS
ON ALL OTHER CONTENTIONS

DAARE/SAFE ON ALL OTHER
CONTENTIONS

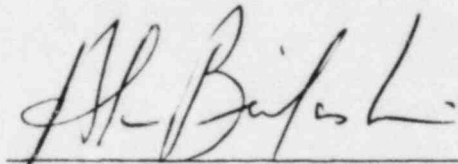
By: _____

By: _____

CERTIFICATE OF SERVICE

The undersigned, one of the attorneys for Commonwealth Edison Company, certifies that on this date he filed two copies (plus the original) of the attached pleading with the Secretary of the Nuclear Regulatory Commission and served a copy of the same on each of the persons at the addresses shown on the attached service list in the manner indicated.

Date: February 15, 1983



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COMMONWEALTH EDISON COMPANY -- Byron Station
Docket Nos. 50-454 and 50-455

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