

October 18, 1982

DOCKETED  
USNRC

UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

~~RELATED CORRESPONDENCE~~

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OFFICE OF SECRETARY  
OF SERVICE

Before the Atomic Safety and Licensing Board

In the Matter of	)	
	)	
THE CLEVELAND ELECTRIC	)	Docket Nos. 50-440
ILLUMINATING COMPANY	)	50-441
	)	
(Perry Nuclear Power Plant,	)	
Units 1 and 2)	)	

APPLICANTS' AMENDED ANSWER TO  
 INTERROGATORY 13 OF SUNFLOWER  
 ALLIANCE, INC., ET AL. SECOND  
 SET OF INTERROGATORIES TO  
APPLICANTS

On August 20, 1982, Applicants filed an answer to Interrogatory 13 of Sunflower Alliance, Inc. Second Set of Interrogatories to Applicants, dated April 30, 1982. Applicants hereby amend their answer to read as follows:

13. Describe all operator actions required in the event of an ATWS. Upon what information will the operator rely as a basis for these actions? At what time into the ATWS will these actions be taken?

Response:

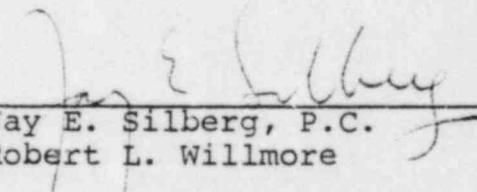
In the event of the occurrence of an ATWS, the operator will monitor the automatic initiation of the backup scram systems, the average power range monitors, and suppression pool temperature. Following the automatic initiation of the backup scram systems, if reactor power remains above specified levels or cannot be determined, and the suppression pool temperature as

monitored by multiple visual and audible control room panel indicators exceeds 110°F, the operator will manually initiate the standby liquid control system thereby injecting boron into the core.

Applicants object to the portion of the interrogatory that is not directed to the issue of SLCS initiation. Issue #6 only concerns the differential advantages and disadvantages associated with using a manual rather than an automatic standby liquid control system. See Order (Concerning a Motion to Compel), August 18, 1982 at 7. Post-ATWS operator action not bearing on this issue is irrelevant and beyond the scope of Issue #6. See 10 C.F.R. § 2.740(b)(1).

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE  
1800 M Street, N.W.  
Washington, D.C. 20036  
(202) 822-1000

By:   
Jay E. Silberg, P.C.  
Robert L. Willmore  
Counsel for Applicants

DATED: October 18, 1982.

THE CLEVELAND ELECTRIC ILLUMINATING COMPANY  
CLEVELAND, OHIO

Frank R. Stead, being duly sworn according to law, deposes that he is Manager, Nuclear Engineering Department of Cleveland Electric Illuminating Company and that the facts set forth in the foregoing "Applicants' Amended Answer to Interrogatory 13 of Sunflower Alliance, Inc. Et Al., Second Set of Interrogatories to Applicants" dated October 18, 1982, are true and correct to the best of his knowledge, information and belief.

Frank R Stead ..

Sworn to and subscribed  
before me this 18th day  
of October, 1982.

Joseph C. Szwejkowski

JOSEPH C. SZWEJKOWSKI  
Notary Public, State of Ohio Cuyahoga County  
My Commission Expires July 14, 1986

October 18, 1982

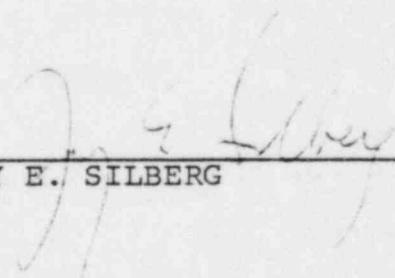
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	)	
(Perry Nuclear Power Plant,	)	
Units 1 and 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of "Applicants' Amended Answer to Interrogatory 13 of Sunflower Alliance, Inc., et al. Second Set of Interrogatories to Applicants" were served this 18th day of October, 1982 by deposit in the United States mail, postage prepaid, addressed to each of those persons on the attached Service List.

  
\_\_\_\_\_  
JAY E. SILBERG

DATED: October 18, 1982

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NUCLEAR REGULATORY COMMISSION

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THE CLEVELAND ELECTRIC ) Docket Nos. 50-440  
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