

RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'82 NOV -1 A10:53

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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In the Matter of )

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

) Docket Nos. 50-443  
) 50-444  
)

(Seabrook Station, Units 1 and 2) )  
\_\_\_\_\_)

NECNP FIRST SET OF INTERROGATORIES AND  
REQUESTS FOR DOCUMENTS TO NRC STAFF ON  
CONTENTIONS I.D.1., I.D.2., I.D.3., I.D.4.,  
I.F., I.G., I.I., I.L., I.M., I.N., AND I.U.

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of the Applicants with personal knowledge of the facts or information requested in each interrogatory.

The following definitions shall apply to these interrogatories:

1. "Document" shall mean any written or graphic matter of communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other means, computer data, computer print-outs, photographs, microfilm, microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of

meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

2. "Identify" shall mean with respect to any document, to state the following respecting the document: its title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3. "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; any document recording or documenting such action.

4. "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; the existence and location of any and all documents relating to such action or matter.

I.D.1. Testing of Reactor Vessel Welds.

1. What is the NRC Staff's position with respect to NECNP Contention I.D.1.? State all facts and opinions and identify and provide access to all documents on which that position is based.

2. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention I.D.1., and identify all documents on which the Staff expects to rely at the hearing with respect to this contention.

3. Identify the provisions of Reg. Guide 1.150 with which Applicants comply.

4. Identify the provisions of Reg. Guide 1.150 with which Applicants do not comply. State the NRC Staff's position with respect to these items of noncompliance.

5. Does the NRC Staff consider that inservice testing of reactor vessel welds is necessary to satisfy General Design Criterion 1 of Appendix A to 10 CFR Part 50? State the reasons supporting this position and provide access to all relevant documents.

6. Does the NRC Staff believe that inservice testing of reactor vessel welds is necessary to provide a reasonable assurance that the Seabrook facility can be operated safely? State the reasons supporting this position and provide access to all relevant documents.

7. Describe all alternative means of testing reactor vessel welds which have been proposed by Applicants in lieu of compliance with Reg. Guide 1.150. State the NRC Staff's position with regard to the adequacy of each alternative measure

to satisfy the requirements of General Design Criterion 1, and state the justification for each such position.

8. Describe all tests that have been conducted on reactor welds at Seabrook and the results of those tests.

9. Identify all reactors at which preservice inspection of reactor vessel welds is accepted as an alternative to inservice testing.

10. Identify any instances in which flaws or defects in reactor vessel welds have been discovered after such preservice inspection was completed or during operation of a reactor, and describe the cause and effect of the flaw or defect. Identify the reactors at which such flaws or defects were discovered.

10. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding Contention I.D.1.

I.D.2. Testing of Protection System Actuation Functions.

1. What is the NRC Staff's position with respect to NECNP Contention I.D.2.? State all facts and opinions and identify and provide access to all documents on which that position is based.

2. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention I.D.2., and identify all documents on which the Staff expects to rely at the hearing with respect to this contention.

3. Identify the provisions of Reg. Guide 1.22 with which Applicants comply and state why they comply.

4. Identify the provisions of Reg. Guide 1.22 with which Applicants do not comply. State the Staff's position with respect to these items of noncompliance.

5. Does the NRC Staff consider that Reg. Guide 1.22 requires testing at power of the twelve functions described in Applicants' FSAR at page 1.8-9? State the reasons supporting your answer for each of the twelve functions.

a. For any of the twelve functions which the Staff believes must be tested at power, state whether the Applicants have justified the omission or employed a sufficient alternative means of assuring the operability of the function. Describe in detail the justification or alternative method offered, the Staff's position with respect to each, and the basis for each such Staff position.

6. Does the NRC Staff believe that testing at power of the twelve functions listed at FSAR page 1.8-9 is required to assure safe operation of the Seabrook nuclear facility? State the reasons supporting your answer for each of the twelve functions.

7. Does the NRC Staff believe that General Design Criteria 20 and 21 require testing at power of the twelve functions? State the reasons supporting your answer for each of the twelve functions.

8. Does the NRC Staff believe that Task II.D.1. of NUREG-0737 requires testing at power of any of the twelve functions listed at FSAR 1.8-9? For each of the twelve functions, state the reasons supporting your answer.

9. Describe the NRC Staff's understanding of the rationale supporting the requirement for testing of protection functions at power.

10. Describe the NRC Staff's understanding of what constitutes "compelling" reasons for not testing protection systems at power, as the term is used in Reg. Guide 1.22.

11. Define the term "practicable" as it is used in Reg. Guide 1.22, Regulatory Position 4.a. State whether the twelve protection systems identified at FSAR page 1.8-9 meet the terms of Regulatory Position 4.a.

12. Define "acceptably low probability" as the term is used in Regulatory Position 4.b., including numerical standards. Provide access to all documents relied upon in support of this position. State whether Applicants have met the terms of Regulatory Position 4.b.

13. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding Contention I.D.2.

I.D.3. Leakage Detection System.

1. What is the NRC Staff's position with respect to NECNP Contention I.D.3.? State all facts and opinions and



identify and provide access to all documents on which that position is based.

2. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention I.D.3., and identify all documents on which the Staff expects to rely at the hearing with respect to this contention.

3. Identify the provisions of Reg. Guide 1.45 with which Applicants' reactor coolant pressure boundary leakage detection system complies.

4. Identify the provisions of Reg. Guide 1.45 with which Applicants' reactor coolant pressure boundary leakage detection system does not comply. Describe any justifications or alternatives offered by Applicants for failure to comply with the Reg. Guide. State whether such justifications or alternatives are acceptable to the Staff and why.

5. Identify the provisions of IEEE-279-71 with which the Applicants' reactor coolant pressure boundary leakage detection system complies.

6. Identify the provisions of IEEE-279-1971 with which Applicants' reactor coolant pressure boundary leakage detection system fails to comply. Describe any justifications or alternatives to compliance with IEEE-279-1971 offered by Applicants. State whether such justifications or alternatives are acceptable to the Staff and why.

7. Is it the NRC Staff's position that Reg. Guide 1.22 requires testing of the reactor coolant pressure boundary

leakage detection system at power? If so, state what provisions of Reg. Guide 1.22 Applicants comply with. State which provisions Applicants' leakage detection system does not comply with, and describe any justifications or alternatives to compliance which have been offered by Applicants. State whether such justifications or alternatives are acceptable to the Staff and why.

8. Describe all leakage detection instruments which the NRC Staff believes should be tested at power and state the reasons supporting that position, including reference to regulations, Reg. Guides, and IEEE standards.

9. Is it the Staff's position that compliance with Reg. Guide 1.45 is necessary to satisfy General Design Criterion 30 or to provide a reasonable assurance that a nuclear facility can be operated safely? State the reasons supporting your position.

10. Is it the Staff's position that compliance with IEEE 279-1971 is necessary to satisfy General Design Criterion 30 or to provide a reasonable assurance that a nuclear facility can be operated safely? State the reasons supporting your position.

11. Is it the Staff's position that compliance with Reg. Guide 1.22 is necessary to satisfy General Design Criterion 20 and 21 and/or to provide a reasonable assurance that a nuclear facility can be operated safely? State the reasons supporting your position.



12. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding Contention I.D.3.

I.D.4. Testing of Power and Protection Systems.

1. What is the NRC Staff's position with respect to NECNP Contention I.D.4? State all facts and opinions and identify and provide access to all documents which support that position.

2. Identify all individuals whom the Staff expects to call as witnesses with respect to NECNP Contention I.D.4. and identify all documents on which the Staff expects to rely at the hearing respecting this contention.

3. Identify all systems the Staff believes must comply with GDC 18, GDC 21, 10 CFR §50.55a, and Criterion XI of Appendix B to 10 CFR Part 50, which require periodic testing of electric power and protection systems.

4. Identify all differences between IEEE Std. 338-1975 and IEEE Std. 338-1977.

5. Explain why the NRC has recommended in Regulatory Guide 1.118 that the requirements and recommendations contained in IEEE Std. 338-1977 be supplemented in the ways stated in Reg. Guide 1.118. For each such NRC recommended supplement describe the additional recommendation or requirement and the reason for its adoption.

6. Is it the NRC Staff's position that Applicants are in compliance with Reg. Guide 1.118? Identify all provisions

of Reg. Guide 1.118 with which Applicants do not comply. State whether such noncompliance is acceptable to the Staff, and explain the reasons for this determination.

7. Identify each alternative method Applicants have proposed to comply with NRC requirements in those instances where it does not comply with the recommended method of compliance presented in Reg. Guide 1.118. For each alternative, state whether it is acceptable to the NRC Staff, and describe the reasons supporting the Staff's determination.

8. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding Contention I.D.4.

I.F. Diesel Generator Qualification.

1. What is the NRC Staff's position with respect to NECNP Contention I.F.? State all facts and opinions and identify and provide access to all documents on which that position is based.

2. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention I.F., and identify all documents on which the Staff expects to rely at the hearing with respect to this contention.

3. Describe the tests which must be conducted by any applicant to comply with IEEE 323-1974 regarding environmental qualification of steam-generator units.

4. State whether or not Applicants have at Seabrook complied with IEEE 323-1974, regarding environmental qualification of steam-generator units.

5. Identify all tests conducted by Applicants in order to environmentally qualify the diesel generator units at Seabrook. State the results of all such tests.

6. If the Applicants have not complied with IEEE 323-1974 describe any justifications offered by Applicants for non-compliance and any alternative method by which Applicants intend to meet the requirements of GDC 17. State the Staff's position as to whether such justification or alternative is adequate to meet the requirements of GDC 17.

7. Is it the Staff's position that a license applicant must comply with IEEE-323-1974 in order to meet the requirements of General Design Criterion 17 and/or to provide a reasonable assurance that a nuclear facility can be operated safely? State the reasons supporting your answer.

8. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding Contention I.F.

I.G. Pressure Instrument Reliability.

1. What is the NRC Staff's position with respect to NECNP Contention I.G.? State all facts and opinions and identify and provide access to all documents which support that position.

2. Identify all individuals whom the Staff expects to call as witnesses with respect to NECNP Contention I.G. and identify all documents on which the Staff expects to rely respecting this contention.

3. State all information the NRC currently possesses about deficiencies in Westinghouse-supplied wide range pressure instruments and/or malfunctioning of such instruments, and describe how it applies to the Seabrook reactor. Provide copies of all documents relating to such deficiencies and malfunctioning.

4. Describe all corrective actions the NRC is requiring of Westinghouse, licensees and applicants for operating licenses to compensate for the problems identified in IE Information Notice No. 82-11. Identify all corrective measures that will be required at Seabrook.

5. Describe the operating history of Westinghouse-supplied wide range pressure instruments and/or malfunctioning of such instruments at operating plants. For any problem identified during the operation of a plant, identify the corrective action taken to remedy the problem.

6. Identify all NRC requirements the Applicants must meet to ensure that Westinghouse-supplied wide range pressure instruments will not endanger the public health and safety.

7. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding contention I.G.

I.I. Cold Shutdown.

1. What is the NRC Staff's position with respect to NECNP Contention I.I.? State all facts and opinions and identify

and provide copies of all documents on which that position is based.

2. Identify all individuals whom the Staff expects to call as witnesses with respect to NECNP Contention I.I. and identify all documents on which the NRC Staff expects to rely at the hearing with respect to this contention.

3. Identify the Staff's position on whether or not Applicants are required to satisfy Reg. Guide 1.139 and the requirements of IE Bulletin 79-01 B, Supp. 3. If not, explain why not.

4. State whether or not the Staff position is that Applicants are required to demonstrate one environmentally qualified path to cold shutdown. State the reasons supporting your position.

5. State the Staff's position with respect to the question of whether license applicants are required to environmentally qualify all equipment necessary to bring the plant to cold shutdown.

If the Staff does not require all such equipment to be environmentally qualified, explain and justify that position.

6. State whether the Staff requires that all equipment necessary to bring the reactors to cold shutdown must be safety-grade. In each case where the equipment is not required to be safety-grade, explain and justify that position.

7. Define the safe hot standby condition of Seabrook. Define the hot shutdown condition of Seabrook. Define the cold shutdown condition for Seabrook.

8. State whether or not the Staff believes Applicants have adequately demonstrated that the plants can be maintained in a hot standby or hot shutdown condition longer than 36 hours by use of the auxiliary feedwater system or residual heat removal system. If so, explain and/or describe how.

9. Identify any outstanding requests for information by the NRC Staff to the Applicants with respect to this issue of achieving safe shutdown. In each case, describe the request and any partial or complete answer by Applicants to such request.

9. Identify and describe all systems, components and structures Applicants have told the NRC Staff will be used to bring the Seabrook plants to a safe shutdown condition.

10. Identify and provide any NRC Staff evaluation of the test results conducted for Applicants' safe shutdown system.

12. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding contention I.I.

I.L. Pressure Operated Relief Valves.

1. What is the NRC Staff's position with respect to NECNP Contention I.L.? State all facts and opinions and identify and provide access to all documents on which that position is based.

2. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention I.L.,



and identify all documents on which the Staff expects to rely at the hearing with respect to this contention.

3. Does the NRC Staff believe that the use of acoustic accelerometers satisfies the requirements of NUREG-0737, Task II.D.3.? State the reasons for your answer and identify all supporting documents.

4. Is the NRC Staff aware of circumstances under which acoustic accelerometers could not be relied upon to give an accurate indication of valve position? Identify and describe those circumstances.

5. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding Contention I.L.

I.M. Fire Protection.

1. What is the NRC Staff's position with respect to NECNP Contention I.M.? State all facts and opinions and identify and provide access to all documents on which that position is based.

2. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention I.M., and identify all documents on which the Staff expects to rely at the hearing with respect to this contention.

3. Is it the Staff's position that under the Commission's order in CLI-80-21, 11 NRC 707, 718 (1980), and Commission regulations, the revision of 10 CFR 50.48 and Appendix R to

10 CFR Part 50, published November 19, 1980, at 45 FR 76602, and Appendix A to Branch Technical Position 9.5-1 of the Standard Review Plan constitute Commission requirements for compliance of the Seabrook plant with General Design Criterion 3 of Appendix A to 10 CFR Part 50? Please state your reasons if you answer this question in the negative.

4. Identify all provisions of 10 CFR 50.48 and Appendix R with which Applicants are not in compliance, and describe the reasons and justifications offered by Applicants for noncompliance. State whether such reasons and justifications are acceptable to the NRC Staff and why or why not. For each standard, identify the measures which must be taken to bring the plant into compliance.

5. Identify all provisions of Appendix A to BTP 9.5-1 with which the Applicants are not in compliance, and describe the reasons and justifications offered by Applicants for noncompliance. State whether such reasons and justifications are acceptable to the NRC Staff and why or why not. Describe the measures which must be taken to bring the plant into compliance with BTP 9.5-1.

6. Identify and provide access to any and all documents generated in preparation for or as a result of the meeting on fire protection between PSNH and the NRC Staff on March 10, 1982, relating to a comparison of PSNH's fire protection system and 10 CFR Part 50, Appendix R.

7. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding contention I.M.

I.N. Solid Waste Management.

1. What is the Staff's position with respect to NECNP Contention I.N.? State all facts and opinions and identify and provide access to all documents which support that position.
2. Identify all individuals whom the Staff expects to call as witnesses with respect to NECNP Contention I.N., and identify all documents on which the Staff expects to rely at the hearing respecting this contention.
3. Describe all components of a radioactive waste management system which must comply with the requirements of GDC 60, and Criteria 1 and 2 of Appendix A to 10 CFR Part 50.
4. Describe the NRC Staff's position as to the acceptable level of radiation to which operating and maintenance personnel may be exposed from the radwaste management system of any nuclear plant.
5. Describe the NRC Staff's position as to the acceptable level of radiation to which the general public may be exposed from the radwaste management system of any nuclear plant.
6. Describe the solid waste management systems at McGuire, Comanche Peak, and Byron/Braidwood. Describe the operating histories of these solid waste management systems.
7. State the Staff's estimate of the annual volume of solid waste produced by plants of the size of the Seabrook units.

8. State the Staff's position as to the reliability, operability and availability of the Applicants' proposed use of one solid waste management system for waste produced from the two Seabrook units.

9. State the Staff's position on the minimum requirements which Applicants' quality assurance program for the radioactive waste management system must meet.

10. Did Applicants submit an earlier solid waste disposal plan which was rejected by the Staff? If so, describe the reasons for its rejection and the Staff's requirements for a new system.

11. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding Contention I.N.

I.U. Turbine Missiles.

1. What is the NRC Staff's position with respect to NECNP Contention I.U.? State all facts and opinions and identify and provide access to all documents on which that position is based.

2. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention I.U., and identify all documents on which the Staff expects to rely at the hearing with respect to this contention.

3. Describe all categories of turbine failures the Staff considers in determining whether an applicant has met GDC 4 so as to protect adequately safety-related structures,

systems and components against low-trajectory missiles resulting from turbine failure.

4. Describe the analysis the Staff employs to determine the total probability of unacceptable damage to safety-related structures, systems and components from low-trajectory missiles, including all formulas used for the Staff's analysis.

5. Describe all alternative analyses, of which the Staff is aware but did not use, to determine the total probability of unacceptable damage to safety-related structures, systems and components from low-trajectory missiles, including alternative values or formulas for  $P_1$ , the rate of turbine failure in events per year;  $P_2$  or the conditional probability that a missile will strike a specified target;  $P_3$ , or the conditional probability that the missile will cause damage to the target that may lead to unacceptable consequences if the target is hit; and  $P_4$  or the probability in events per year of unacceptable damage from a turbine failure.

6. Define "unacceptable consequence" or "unacceptable damage" as those terms are used in your analysis.

7. Describe in detail turbine failures caused by design overspeed failures; caused by destructive overspeed failures; and caused by stress corrosion. For each cause of turbine failure, state the circumstances under which the failure can occur, including the operating speed of the turbines; the materials which may increase or decrease the

probability of such failures; the possible harmful consequences resulting from each such failure; the root cause of each such failure; and the corrective measures available, if any, to mitigate or avoid the problem.

8. Identify each system which must be protected from turbine missiles.

9. State the standard employed by the NRC Staff to determine if the probability of damage due to low-trajectory turbine missile failures is acceptably low.

10. Describe the methods by which the design overspeed failure rate of turbines may be reduced, and identify all documents which support this view.

11. Describe all methods which may reduce the destructive overspeed failure rate of turbines and identify all documents which support this view.

12. Describe the current investigation conducted by the NRC staff regarding turbine valve failure modes, and identify the status of the investigation and all documents relating to the investigation.

13. Describe the Staff's evaluation, in terms of reducing the probability of damage to safety-related components, systems, and structures, from turbine missile failures of the various methods of protecting such systems, components and structures including the following:

a. exclusion of the systems from the low-trajectory hazard zone;

b. placement of the systems far enough away from



the turbine missile so that the probability of its being struck by a turbine missile is less than  $10^{-3}$ ;

- c. placement of essential systems;
- d. separation of redundant equipment;
- e. strike and damage analyses of turbine valve reliability;
- f. improvements in turbine valve reliability;
- g. improved in-service inspection programs;
- h. change in placement of nuclear plants on site vis-a-vis each other.

14. Describe any information the Staff has available concerning the impact of large irregularly-shaped missiles similar to turbine missiles on steel or reinforced concrete structures.

15. Describe all formulas of which the NRC Staff is aware that can be used to determine the impact effects of missiles on concrete structures or steel structures.

16. Describe the Staff's analysis of the residual velocity of a missile after perforation.

17. Evaluate whether or not, whenever an applicant proposes to protect a safety-related system by a barrier or barriers, the protection is sufficient so that no missile can compromise the final barrier protecting the system. Describe the Staff's evaluation for each and every such system protected by a barrier.

18. Identify all studies the NRC or its contractors have conducted on the probability of turbine failure due to stress corrosion and the root cause(s) of stress corrosion cracking, and all documents relating to these studies.

19. Identify all studies within the possession or control of the NRC or its contractors relating to turbine disc cracking and necessary inspection of turbines due to possible turbine disc cracking.

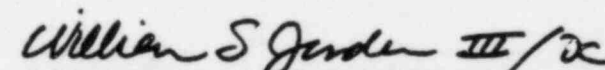
20. State the cause of turbine failure the NRC Staff considers most significant, and how the importance of this stated cause of turbine failure is incorporated in its analyses of the probability of damage to safety-related systems, components, and structures from turbine missiles.

21. Identify and provide access to any and all documents in the NRC Staff's position relating to turbine integrity and failure, and the generation and effects of low-trajectory missiles.

22. Identify and provide access to any and all documents referred to or relied on in preparing the response to the interrogatories regarding Contention I.U.

Respectfully submitted,

  
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October 29, 1982

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing NECNP FIRST SET OF INTERROGATORIES AND REQUESTS FOR DOCUMENTS TO NRC STAFF and TO APPLICANTS ON CONTENTIONS I.D.1., I.D.2., I.D.3., I.D.4., I.F., I.G., I.I., I.L., I.M., I.N., AND I.U., have been mailed this 29th day of October, 1982, first class, postage paid, to the following:

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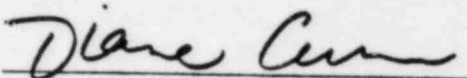
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