

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

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

(Seabrook Station, Units 1 and 2) )

Docket Nos. 50-443  
50-444

NECNP SECOND SET OF INTERROGATORIES AND  
REQUEST FOR DOCUMENTS TO APPLICANTS ON CONTENTIONS  
I.A.2., I.B.1., I.B.2., and I.C.

The New England Coalition on Nuclear Pollution (NECNP) requests that the Applicants, pursuant to 10 C.F.R. §§2.740(b) and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents therein identified, the Applicants file supplemental responses and produce additional documents as required by 10 C.F.R. §2.740(e).

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

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As used in these discovery requests the term "document(s)" includes publications of any format, letters, memoranda, notes, reports, analyses, test results or data, recordings, transcriptions and printed, typed or written materials of every kind. It encompasses all manner of recording information, whether written, electronic, magnetic, or otherwise.

This set of interrogatories is NECNP's immediate follow-up to the first set with respect to Contentions I.A.2., I.B.1., I.B.2., and I.C. Their primary purpose is to provide clarifying information to permit expert review. The responses to this set of interrogatories will also provide information necessary to permit effective document review with respect to both of the first two sets, which we hope to schedule soon after we have received the answers to this set. We expect to file further discovery requests after we have received that information and have had an opportunity for extensive expert review and consultation.

#### INTERROGATORIES

1. In response to NECNP's first set of interrogatories on Contentions I.A.2., I.B.1., I.B.2., and I.C., Applicants consistently used the term "safety related" and took the position that all safety related equipment had been environmentally qualified. In response to Interrogatory 3, Applicants stated that, "no distinction was made between "safety related" and "important to safety." In response to Interrogatory 21, Applicants asserted that all safety related systems are also "important to safety."

- a. Define the term "safety related" as used by Applicants.
  - (1) State the technical, legal, regulatory, or other basis for this definition.
  - (2) State the criteria used by Applicants to determine whether equipment is safety related.
  - (3) Is it Applicant's position that only safety related equipment is required to be environmentally qualified? If so, state the technical, legal, regulatory, or other basis for that position. If not, identify and describe all other equipment that must be environmentally qualified.
  
- b. Define the term "important to safety" as used by Applicants.
  - (1) State the technical, legal, regulatory, or other basis for this definition.
  - (2) State the Applicants' understanding of the difference, if any, between "safety related" equipment or systems and equipment or systems that are "important to safety." State the principle, if any, that distinguishes the two.
  - (3) Identify and describe all equipment and systems, if any, that are "important to safety," but are not "safety related," and therefore, according to Applicants, do not need to be environmentally qualified.

2. In response to Interrogatory 5, Applicants noted that the proposed rule referred to in the Interrogatory had been revised in April 1982. NECNP is unable to find any reference to this revision. Please identify specifically, with appropriate citations, the document containing the April revision.

3. In response to Interrogatory 10, Applicants noted that while there were no environmentally qualified electrical connectors commercially available when CLI-80-21 was issued, that was not true of electric valve operators.

- a. Describe and state the function of an electrical connector.
- b. Identify all electrical connectors that are used in connection with safety related electric valve operators.
  - (1) State the function of the electrical connector in each case.
  - (2) State whether the use of the electrical connector is essential to the use of the electric valve operator.
- c. Identify and describe the function of all safety related electrical connectors.
- d. Explain how safety related electrical connectors can comply with IEEE 323-1974 when the Commission stated in CLI-80-21 that there were at that time no commercially available electrical connectors that complied with IEEE 323-1974.

4. In response to Interrogatory 15, Applicants stated that, "The safety-related equipment that is required to withstand the effects of the accident environment will do so for a minimum of one year." The answer did not explain the basis for that statement, as the interrogatory had requested.

- a. Explain the basis for the statement quoted above.
- b. Explain the basis for choosing one year as a sufficient period of time to assure adequate protection.

5. Interrogatory 31 asked whether it was Applicants' position that structures, systems and components governed by GDC 4 must be able to accommodate the effects of and be compatible with the environmental conditions associated with loss of coolant accidents throughout the operating lifetime of the plant. Applicants responded that such structures, systems, and components are able to withstand accident conditions during the operating life of the plant, but did not state a position on the question that was asked. Accordingly, is it Applicant's position that safety-related structures, systems, and components must be able to accommodate the effects of and be compatible with the environmental conditions associated with loss-of-coolant accidents throughout the operating life of the plant?

- a. If not, please respond to Interrogatory 31(a).


6. Interrogatory 34 asked for Applicants' position on the question of whether Applicants need to establish that structures, systems, or components governed by GDC 4 will remain

environmentally qualified for any period of time once an accident begins. It also asked the periods of time that Applicants contend they must show that structures, systems, and components governed by GDC 4 will remain environmentally qualified once an accident begins.

Applicants responded that all structures, systems or components that are required to be operational are qualified to remain operational for the time required to perform their safety function. As a result, Applicants did not respond to either of the questions asked in the interrogatory.

- a. Assuming the facts are as Applicants state them, is it Applicants' position that it must so convince the Board in order to meet its burden of proof?
- b. For each structure, system, and component referred to in Applicants' answer, state the time required to perform its safety function under a design basis accident that represents the worst case for the structure, system, or component in question. In each case, describe the design basis accident.

Respectfully submitted,

  
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November 23, 1982

Counsel for NECNP

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing NECNP SECOND SET OF INTERROGATORIES AND REQUEST FOR DOCUMENTS TO APPLICANTS ON CONTENTIONS I.A.2., I.B.1., I.B.2., and I.C., have been mailed, first class, postage pre-paid to the following this 23rd day of November, 1982:

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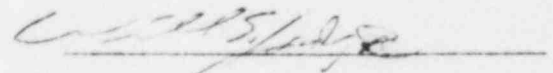
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