

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
 )  
CONSUMERS POWER COMPANY ) Docket No. 50-155-OLA  
 ) (Spent Fuel Pool  
 ) Modification)  
(Big Rock Point Nuclear Power Plant) )

CONSUMERS POWER COMPANY'S REPLY  
TO INTERVENORS PROPOSED FINDINGS  
ON CHRISTA-MARIA CONTENTION 8  
AND O'NEILL CONTENTION III E-2  
(THE "TMI-2 CONTENTION")

I. Introduction

Consumers Power Company ("Licensee"), NRC Staff, and Intervenor Christa-Maria, et al. ("Intervenors") filed proposed findings of fact on or before August 19, 1982, with respect to Genuine Issues of Fact (1), (2) and (3) which were admitted under Christa-Maria Contention 8 and O'Neill Contention III E-2. In accordance with the schedule approved by the Atomic Safety and Licensing Board, as modified at request of the NRC Staff, Licensee hereby submits its reply to Intervenor's proposed findings of fact on Genuine Issue of Fact (3), namely that issue regarding the motor operated valves, MO-7064 and MO-7068. No reply is being made to Intervenor's proposed findings on Genuine Issue of Fact (1) concerning the reliability of the spent fuel pool makeup line

since this issue has been deferred.<sup>1/</sup> In addition, no reply is being made to Intervenors' proposed findings on Genuine Issue of Fact (3) concerning the reliability of the spent fuel pool water level monitor since Intervenors did not take issue with the reliability of the monitor.<sup>2/</sup>

II. Qualification of Motor Operated Valves, MO-7064 and MO-7068

It should be stressed at the outset that Intervenors misperceive the relationship of these motor operated valves with the proposed expansion of the Big Rock Point spent fuel pool. Intervenors assert that valves MO-7064 and MO-7068 and the containment spray system are needed to control containment pressure.<sup>3/</sup> As Mr. Blanchard clearly stated in his testimony, this assertion is not accurate. Rather, the motor operated valves serve the dual function of reducing temperature and washing down the iodine that may be present in the containment atmosphere.<sup>4/</sup> Thus, the question

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1/ Licensee's motion to defer this issue was granted by the Licensing Board today, September 20, 1982.

2/ Intervenors did suggest in their proposed findings that a second monitor be installed. However, this suggestion is not premised on any evidence before the Licensing Board, and it should be disregarded.

3/ "Intervenors Proposed Findings of Fact," postmarked August 13, 1982, pp. 9-10, concerning Christa-Maria Contention 8 and O'Neill Contention III E-2.

4/ "Further Testimony of David P. Blanchard on Christa-Maria Contention 8 and O'Neill Contention III E-2, following Tr. 2024, pp. 24-25. Mr. Blanchard's statement on page 24 that the containment sprays "reduce containment pressure" was erroneous, and the statement was corrected to read "reduce containment temperature." Tr. 2014-15.

posed in Genuine Issue of Fact (3), namely, are MO-7064 and MO-7068 necessary to control containment pressurization?, is answered in the negative. Although this uncontroverted testimony is dispositive of any controversy surrounding this Genuine Issue of Fact, Mr. Blanchard analyzed the problem further.

Mr. Blanchard pointed out that the containment is designed to withstand a pressure of 27 psig. The amount of energy in the primary coolant system is such that no postulated LOCA could result in containment pressurization of 27 psig.<sup>5/</sup> Moreover, pool boiling would not contribute to the total containment pressure during a LOCA because such boiling would occur long after the pressure build up from a LOCA had dissipated.<sup>6/</sup>

Mr. Blanchard also testified that valves MO-7064 and MO-7068 are being re-qualified in accordance with the NRC's pending rulemaking proceeding concerning the environmental qualification of electrical equipment.<sup>7/</sup> The NRC Commissioners issued a proposed rule on January 20, 1982,<sup>8/</sup> and requested comments with respect to a comprehensive program for the environmental qualification of electrical equipment. The proposed rule, inter alia, recognized that the qualification of electric components for plants which were licensed to operate prior to 1971, like Big Rock Point, was based

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<sup>5/</sup> Id., p.25.

<sup>6/</sup> Id., pp. 25-26 and Attachment 1.

<sup>7/</sup> Id., p. 26.

<sup>8/</sup> 47 Fed. Reg. 2876.

on "high industrial quality" manufacturing practices.<sup>9/</sup> Nevertheless, the Commissioners prescribed that licensees for operating plants must submit analyses to the NRC Staff, to ensure that plants can be safely operated pending completion of the rulemaking.<sup>10/</sup>

Licensee, pursuant to the Commissioners' mandate, submitted documentation justifying interim operation of Big Rock Point on March 15, 1982. Excerpts of this submission relevant to valves MO-7064 and MO-7068 are included in Mr. Blanchard's testimony.<sup>11/</sup> A review of that testimony and documentation supports a conclusion that valves MO-7064 and MO-7068 are qualified, at a minimum on an interim basis pending completion of the rulemaking, for high temperature and high pressure conditions.

An actuator of the same type as MO-7064 was subjected to a 36 hour LOCA simulation which included maintenance of relative humidity at or near 100% and temperature rise up to 240 degrees Fahrenheit.<sup>12/</sup> A test for radiation and thermal aging qualification was conducted on units similar to the MO-7064 type, the results of which would be exactly the same for the MO-7064 valve type.<sup>13/</sup> Based on the results of these tests, MO-7064 is

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9/ Id.

10/ 47 Fed. Reg. 2877.

11/ Blanchard Testimony, p. 26 and Attachment 2.

12/ Id., Attachment 2, p.89.

13/ Id., Attachment 2, p. 89.

expected to operate during the time its operation would be necessary. Actuation would occur shortly following the initiation of a LOCA event. MO-7064 would fulfill its intended safety function within one day before significant containment environment degradation would occur. The amount of radiation MO-7064 will receive during that one day time period is well within the radiation resistance of almost any material. The valve is not required to operate beyond one day following the LOCA.<sup>14/</sup>

An actuator of the same type as MO-7068 was also subjected to a 36 hour test simulating LOCA conditions of 100% humidity and temperature rise to 240 degrees Fahrenheit.<sup>15/</sup> Although this type of actuator has not been tested for radiation or thermal aging qualification, most component materials used in the manufacturing of actuators and motors can withstand a threshold damage limit of at least  $4.0 \times 10^6$  rads.<sup>16/</sup> In any event, MO-7068 is merely a redundant system. The primary containment spray system through MO-7064 provides sufficient spray flow to control the temperature rise in the containment. Further, like MO-7064, MO-7068 would be called upon to perform and complete its intended safety function prior to prolonged exposure to conditions which could conceivably cause its failure.<sup>17/</sup>

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<sup>14/</sup> Id., Attachment 2, p. 90.

<sup>15/</sup> Id., Attachment 2, p. 97.

<sup>16/</sup> Id., Attachment 2, p. 97.

<sup>17/</sup> Id., Attachment 2, p. 97a.

The NRC Staff reviewed the foregoing information in documentation submitted by Licensee. Based on their review, the NRC Staff found ample justification for interim operation of the electrical equipment at Big Rock Point, including motor operated valves MO-7064 and MO-7068.<sup>18/</sup> Thus, the operation of Big Rock Point is in full compliance with the rulemaking process established by the Commissioners. Big Rock Point, like all other operating plants, will meet the requirements of the final rule once it is promulgated by the NRC.<sup>19/</sup>

### III. CONCLUSION

For the reasons stated herein and in Licensee's affirmative findings of fact and conclusions of law, Genuine Issue

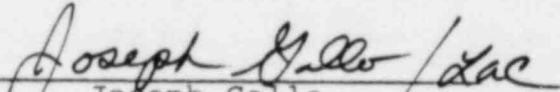
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<sup>18/</sup> Id., Attachment 3.

<sup>19/</sup> The Commissioners suspended their previous deadline of June 30, 1982 by which all licensees of operating plants had to complete the qualification of safety-related electrical equipment. (47 Fed. Reg. 28363, June 30, 1982). No final action has been taken with respect to the proposed rule as of September 20, 1982.

of Fact (3) concerning valves MO-7064 and MO-7068 is without merit,  
and it should be dismissed.

Respectfully submitted,

  
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Dated: September 20, 1982

UNITED STATES OF AMERICA  
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In the Matter of )  
CONSUMERS POWER COMPANY ) Docket No. 50-155-OLA  
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Modification)

CERTIFICATE OF SERVICE

I hereby certify that copies of CONSUMERS POWER COMPANY'S REPLY TO INTERVENORS PROPOSED FINDINGS ON CHRISTA-MARIA CONTENTION 8 AND O'NEILL CONTENTION III E-2 (THE "TMI-2 CONTENTION") were served on all persons listed below by deposit in the United States mail, first-class postage pre-paid, this 20th day of September, 1982.

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