

UNITED STATES OF AMERICA
 NUCLEAR REGULATORY COMMISSION

Before the
 ATOMIC SAFETY AND LICENSING BOARD

In the matter of: PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE) ET AL.) (Seabrook Station, Units 1 and 2))))))))	Docket Nos.: 50-443 and 50-444 March 23, 1983
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THE STATE OF NEW HAMPSHIRE'S ANSWER TO THE
 APPLICANT'S AND THE STAFF'S MOTIONS FOR
 SUMMARY DISPOSITION OF CONTENTION NECNP-I.B.1

Pursuant to 10 C.F.R. §2.749 the State of New Hampshire hereby answers the Staff's and the Applicant's Motions for Summary Disposition of Contention NECNP-I.B.1, and opposes these motions for the reasons explained below.

Contention NECNP-I.B.1 asserts in broad terms that the residual heat removal system for Seabrook Station does not satisfy the requirements of GDC 4 and GDC 34. New Hampshire has raised the particular question of the reliability of the steam generator tubes as the heat sink in the residual heat removal system.^{1/}

The Applicant and Staff in their respective motions for summary disposition on this contention do not respond to New Hampshire's expressed concerns about this issue. New Hampshire has questioned the ability of the Westinghouse steam generators to serve as an

^{1/} See New Hampshire's January 17, 1983 answers to Applicant's Interrogatories, at p. 16, and New Hampshire's February 19, 1983 Answer to Applicant's Motion to Compel, at p. 9.

adequate heat sink in light of the repeated occurrences of tube ruptures with this type of steam generator. Tube rupture problems have persisted even with Westinghouse's latest Model F steam generator. Affidavit of Dr. Stephen S. T. Fan, ¶2. Given this evidence of unreliability of the steam generators, it is important to determine how the steam generators will function if their efficiency is impaired due to loss of a portion of the heat transfer surface resulting from defective tubes.

In light of the above, the Applicant has complied with neither GDC 34, in failing to provide for an adequate residual heat removal system, nor GDC 4, in failing to demonstrate that the steam generator is able to "accommodate the effects of and to be compatible with the environmental conditions associated with normal operation . . . and postulated accidents." 10 C.F.R. Part 50, Appendix A, Criterion 4.

Given this factual dispute over the adequacy of the steam generators in providing residual heat removal capabilities, the Staff's and Applicant's Motions for Summary Disposition of Contention NECNP-I.B.1 should be denied.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

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STATEMENT OF MATERIAL FACTS AS TO WHICH THERE IS DISPUTE

1. In view of the fact that the integrity of Westinghouse steam generator tubes has been under question, due to repeated occurrences of tube ruptures, it is important to determine how the residual heat removal system will function if the efficiency of the steam generator is impaired due to the loss of a portion of the heat transfer surface resulting from the defective tubes.
2. This tube integrity problem has persisted with Westinghouse's latest Model F steam generator.
3. Furthermore, due to low temperature driving force and the possibility of flow reversal in some of the tubes during natural circulation conditions, the margin of safety for heat transfer may not be large.
4. Based on the above considerations, the design of the residual heat removal system should be thoroughly studied to fully assess the design limit and effectiveness of the system and to determine if additional means of residual heat removal should be introduced to ensure adequacy of the system.
5. Unless and until this study is performed there is insufficient assurance of a reliable residual heat removal system that is environmentally qualified, satisfying the requirements of GDC 34 and GDC 4.