

January 21, 1982

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)

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Docket Nos. 50-443 OL
50-444 OL

NRC STAFF RESPONSE TO "SAPL'S SECOND
SET OF INTERROGATORIES TO THE NRC STAFF"

INTERROGATORY 1

With regard to Table 5.7 of the DES, Activity of radionuclides in a Seabrook reactor core at 3425 MWt, please identify the source of the data contained in this Table and state whether the source terms are consistent with those contained in NUREG-0773.

RESPONSE

The data contained in Table 5.7 of the DES, Activity of radionuclides in a Seabrook reactor core at 3425 MWt is scaled from similar data used in the Reactor Safety Study (WASH-1400) for a 3200 MWt reactor core. The source terms are similar but somewhat different from those contained in NUREG-0773.

INTERROGATORY 2

With regard to Appendix E, Rebaselining of the RSS Results for PWRs, please identify the following:

- A. The person or persons responsible for the rebaselining.
- B. Any new data used in the rebaselining, as opposed from new computer code modeling.

DESIGNATED ORIGINAL

Certified By

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PDR ADOCK 05000443
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RESPONSE

A. The persons responsible for the rebaselining referred to in Appendix E, Rebaselining of the RSS Results for PWR's, are M. Taylor, U.S. NRC, and P. Cybulskis, R. Denning, and R. Wooten, all of the Battelle Columbus Laboratories.

B. There is no new data used in the rebaselining, only new computer code modeling.

INTERROGATORY 3

Please identify any documents used by the Staff, not referenced in the DES, used in arriving at accident consequences depicted in the DES, particularly Tables 5.4 through 5.7. As to each such document, please describe it by title, principal author, and state its availability.

RESPONSE

With respect to Table 5.7, the ORIGIN computer code was used to generate the tabulated radionuclide activities. This code is documented in ORNL-4628, entitled ORIGIN - THE ORNL ISOTOPE GENERATION AND DEPLETION CODE, dated May, 1973; authored by M. J. Bell. Copies of this report are available at a cost per copy of \$14.50 from:

NTIS
U.S. Department of Commerce
Springfield, Virginia 22161
(202) 487-4600

INTERROGATORY 4

Please provide a copy of NUREG-0715.

RESPONSE

A copy of NUREG-0715 will be supplied to the Local Public Document Room.

INTERROGATORY 5

Please furnish a copy of IE Bulletin No. 81-03, referred to on page 4-23.

INTERROGATORY 6

On page 5-2 of the DES, the Staff describes that the original concentration of 2 mg/liters of total residual oxidant will be reduced in the system piping. Please explain the basis for this statement, and also the biological significance, if any, of a reduction in the biocide concentration.

INTERROGATORY 7

Please set forth permit requirements for other nuclear plants which use hypo-chlorite or other biocides for biofouling control.

INTERROGATORY 8

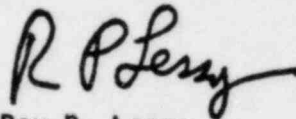
With regard to Table 4.3, has the Staff undertaken any studies to determine the nutrient loading that would be caused in the receiving waters for the chemicals which would be discharged in the pre-operational phase? If so, please state the results of any such studies.

RESPONSE

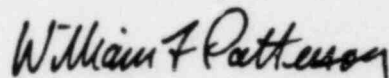
The Staff objects to Interrogatories 5 through 8 in that they do not relate to any contention admitted by the Licensing Board in this proceeding. "All discovery requests must be relevant to the subject matter of the proceeding; that is, they may relate only to those matters in controversy which have been identified by the [Licensing Board following a special] prehearing conference." 10 C.F.R. 2.740(b)(1)." Pennsylvania Power and Light Company (Susquehanna Station, Units 1 and 2), ALAB-613, 12 NRC 317, 322 (1980). These interrogatories pertain to a proposed SAPL contention, which was not admitted for litigation by the presiding Licensing Board. As such, the requirements of 10 C.F.R. § 2.720(h)(2)(ii), governing discovery against the Staff also have not been met in that it has not been demonstrated that the requested information is necessary to a

proper decision in the proceeding. The Staff therefore also objects to these interrogatories on the ground that the requirements of 10 C.F.R. § 2.720(h)(2)(ii) have not been met.

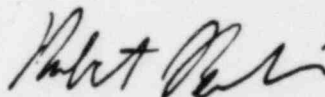
Respectfully submitted,



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Counsel for NRC Staff

Dated at Bethesda, Maryland
this 21st day of January, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF RESPONSE TO "SAPL'S SECOND SET OF INTERROGATORIES TO THE NRC STAFF" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class or, as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, or, as indicated by a double asterisk, served by Express Mail, or, as indicated by a triple asterisk, hand-delivered by messenger, this 21st day of January, 1983.

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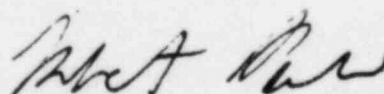
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