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COMMISSIONERS  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON DC 20555

PURSUANT TO 10 CFR 2.206 THE CONCERNED CITIZENS OF CHARLEVOIX INTERVENE IN CONSUMER POWER PROPOSED EDITION OF SPENT FUELS INTO THE POOL EXCEEDING 132 FUELS ASSEMBLY FOR INSPECTION OR ANY OTHER PURPOSES. THERE IS NO SAFETY GRADED EQUIPMENT AVAILABLE TO COOL THE SPENT FUEL POOL AND ALL EQUIPMENT MUST BE ASSUMED TO FAIL IN THE EVENT OF AN ACCIDENT (BLANCHARD TESTIMONY SUMMARY DISPOSITION SPENT FUEL CASE) BECAUSE THERE IS NO PROVEN SAFETY GRADED EQUIPMENT ASSOCIATED WITH POOL COOLING, WE MUST ASSUME THAT A SINGLE FAILURE COULD CAUSE BOILING (CONSUMER POWERS' BIG ROCK SPENT FUEL RACK EDITION DESCRIPTION AND SAFETY ANALYSIS APRIL 1979).

A) SEE DEPOSITION OF BROOKS AND FIONA DECEMBER 29 1982, JANUARY 10 1983 CONCERNING SPECIAL CIRCUMSTANCES RELATING TO T.E. NEUTRON MULTIPLICATION FACTOR IN OVER MODERATED SPENT FUEL POOLS, STEAM VOID CONDITION, RESEARCH FUEL, SINGLE FAILURE CRITERIA, ETC.

A WATER MAKE-UP LINE THAT IS NOT DEDICATED HAS NOT BEEN TESTED ONLY HYPOTHESIZED ON PAPER IS NO RESOLUTION. IF FULL INVESTIGATION INTO THE FOLLOWING MATTERS ARE STILL NECESSARY TO PROTECT THE SAFETY OF AREA RESIDENTS.

DIRECT RESPONSES TO THE FOLLOWING ITEMS AS REQUESTED BY MR LAIMAS MAY 21 1982 ARE:

1. PAGE 12-41 AND 12-42 INDICATE THAT THE WALLS ARE ASSUMED (WITH NO BACK-UP CALCULATION) TO BE SIMPLY SUPPORTED AT THEIR TOPS. DRAWING INDICATE THAT THE STEEL FRAMING AND STEEL PLATE FLOORING SUPPORTED FROM THE TOP OF THE WALLS ARE NOT ADEQUATE TO SUPPORT THIS ASSUMPTION.

2. THE THERMAL LOADING ANALYSIS CONTAINED IN SECTION 12.1.3.4 OF THE NUS CALCULATION IS GENERALLY INADEQUATE AND CONTAINS NUMEROUS ERRORS. CRACKED SECTION THERMAL LOADS IN SECTION 12.1.34 OF THE NUS CALCULATIONS HAVE BEEN EVALUATED USING ERRONEOUS ASSUMPTIONS AND MISAPPLICATIONS OF THE REFERENCED MYTHOLOGY. THE NEUTRAL ACCESS FOR THE CORRECT CONDITION IS ASSUMED (WITHOUT BASIS) TO BE LOCATED AT ONE-THIRD, THE THICKNESS FROM THE COMPRESSION SURFACE AND THE RESULTANT REBAR FORCED IS DETERMINED FROM EQUILIBRIUM. BASIC CONCRETE DESIGN THEORY INDICATES THAT BOTH STRAINED COMPATIBILITY AND EQUILIBRIUM MUST BE ENFORCED SIMULTANEOUSLY TO CALCULATE THE NEUTRAL ACCESS LOCATION AND RESULTANT FORCES AND STRESSES. THE UNCRACKED

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SECTION RESULTANT FORCE PROFILES ARE ERRONEOUSLY DETERMINED AND DO NOT SATISFY EQUILIBRIUM AS THEY SHOULD. ALSO ERRONEOUS FORCE RESULTANTS ARE USED IN THE NUS CORRECT EQUILIBRIUM CALCULATIONS.

3. THE LICENSEES REFERENCE TO ACI STANDARD 349-69 IN THE NUS CALCULATIONS, SECTION 12.1.34 IS NOT VALID. THE FIRST PUBLIC APPEARANCE OF ACI 349 WAS IN THE FEBRUARY 1975 ACI JOURNAL. IT WAS ACCEPTED AS A STANDARD BY COMMITTEE BALLOT IN JUNE 1976 AND PUBLISHED FIRST AS ACI STANDARD 349-76. THE LICENSEES REFERENCE WAS ACTUALLY A JANUARY 1972 ACI JOURNAL ARTICLE. A MORE APPROPRIATE REFERENCE ON THE SUBJECT OF THERMAL STRESS ANALYSIS FOR CONCRETE IS ACI REPORT 349.7R-80, RE-ENFORCED CONCRETE DESIGNS FOR THERMAL EFFECT ON NUCLEAR POWER PLANT STRUCTURES 1980.

4. THE STEEL AREA ASSOCIATED WITH NUMBER 9 REBARS AT 10 INCHES ON CENTER IS ERRONEOUSLY ASSUMED IN NUS CALCULATIONS, SECTION 12.1.3.4 TO BE 0.8836 IN (2) RATHER THAN 1.2 IN (2).

5. IN-PLAINE SIZE MAKE LOADS FROM GROSS STRUCTURAL RESPONSE ON POOL STRUCTURE ELEMENTS ARE NOT CONSIDERED.

6. BOND REDUCTION CONSIDERATIONS ON REBAR TAP SLICES WERE NOT ADDRESSED.

7. THE VALIDITY OF THE ASSUMPTION OF FIXED BOUNDARIES FOR THE POOL WALLS AND FLOORS WAS NOT CHECKED CONSIDERING THE IN-SITU STRUCTURAL CONFIGURATIONS, AND THE CONSTRUCTION JOINTS ON DRAWINGS AT THE WALL-FLOOR INTERSECTIONS.

8. SPECIFICATION OF THE WALLS SECTION DEPTH AS 0.8H FOR SHEAR CAPACITY CALCULATIONS IS ONLY VALID PER ACI 318-77, FOR EVALUATING PRE-STRESSED CONCRETE MEMBERS AND WALLS FOR IN-PLAINE BEHAVIOR NOT FOR THE OUT OF CLAIM STRENGTHS OF THE WALLS AND FLOORS THEY ARE EVALUATING.

9. VERTICAL HYDRODYNAMIC FORCES INDUCED BY HORIZONTAL ACCELERATION DURING A SIZEMAKE EVENT ARE NOT CONSIDERED. SIMILARLY, HORIZONTAL HYDRODYNAMIC FORCES INDUCED BY VERTICAL MOTIONS ARE NOT CONSIDERED (ERRORS AND DEFICIENCIES IDENTIFIED BY AUDIT REVIEW OF NUS-3567, REV #1. THESE BASICS GROSS ERRORS AND DEFICIENCIES MUST NOT BE ALLOWED TO REMAIN UNRESOLVED.

BIG ROCK POINT PLANT PRESENTS A SPECIAL DANGER TO THE POPULATION OF CHARLEVOIX, IT CANNOT MEET THE NRC SAFETY GOAL OF ONE IN 10,000 DEATH PER REACTOR YEAR BY CONSUMER POWER OWN ASSESSMENT (PRA) IT IS ONLY ONE IN 1,000. THE PLANT IS REQUESTING RELIEF FROM COSTLY TMI AND SEP MODIFICATION CLAIMING THAT THEY CANNOT CONTINUE TO OPERATE COST EFFECTIVELY AND MAKE MANDATED SAFETY MODIFICATIONS. WE INTERVENE IN THE INTEREST OF THE HEALTH AND SAFETY OF OUR CHILDREN AND OURSELVES, WE CANNOT ALLOW OUR SAFETY TO BE FURTHER COMPROMISED. WE REPRESENTS OURSELVES IN THIS PROCEEDING.

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