

127

RE: PHILA. ELEC. CO.

Limerick Gen Sta. Units 1 & 2.

Docket # 50- 352, 353.

May 30 , 1984

SUPPLEMENT TO R.L. ANTHONY/FOE MOTION VS. APPLICANTS MOTION FOR PARTIAL DECISION AND LOW POWER LICENSE, AND SUBMISSION OF CONTENTIONS ON NEW MATTER, DATED 5/18/84.

Contention 11. PECO has moved uranium fuel to the Limerick site without waiting for a decision by the Commission on our appeal, dated 4/5/84, from the decision of the Appeal Board (3/30/84). We believe that the Commission will decide in our favor on the basis of PECO's procedural violations and lack of readiness to receive or store fuel. PE is not allowed to move or uncover the fuel under the license issued. And this license will be revoked when and if the Commission decides in our favor. All the procedural violations as well as deficiencies in PE's construction, equipment, staff, procedures, and training as itemized in our Appeal to the Commission and our Brief to the Appeal Board, 3/28/84 are included in this contention by reference.

Contention 12. We assert that the dangers from an explosion on the railroad have not been evaluated for the hazard to fuel being transported from outside storage to the fuel hoistway in the plant, and uncrating there. We were prevented from examining witnesses on the railroad blast during Cont. V 3a and b. (structural). The missiles that can be launched as well as overpressures, afford grave threats.

Cont. 13. The PE study of "issue 13" SER (NUREG - 0991) forwarded by J.S. Kemper to A. Schwencer, NRC, 5/4/84 evaluating the effects of high energy line (HELB) breaks on "all possible combinations of control systems" does not assess completely the risk because of the exclusion of lines which operate 2% or less above 200°P. and 275 psig. These are lines most subject to rupture because of the fluctuations in heat and pressure and they could trigger other breaks and bring the cumulative consequences above the PSAR Chap. 15 analysis. In addition the effects of HELB breaks on fuel handling have not been evaluated, including breaks which could rupture the pipe tunnel over which the fuel must pass in entering the plant (south).
FSAR Fig. 6.2-34.

Cont. 14. At the Commission meeting in Washington on 4/24/84 the progress of the Limerick licensing proceeding, among others, was discussed. (See trans. p. 38, copy accompanying) The applicant estimates a fuel load date in August 1984; the Staff estimates construction completion in the spring of 1985. This discrepancy suggests an unrealistic view of construction and turn-over as well as a possible glossing over of safety issues which will not satisfy NRC requirements and disqualifies any consideration of an expedited decision or low power fuel loading.

Addition to Contentions 6, 7, and 9 from from ASL Appeal Board Memorandum and Order, 5/7/84 Commonwealth Edison (Byron. Docket STN 50-454, 455). Much of this decision applies to violations and lapses in PE supervision of inspection, especially p. 8 "(QA) shortcomings precluded... assurance... construction infirmities detected and rectified."
cc: Judges Brenner, Cole, Morris.
Robert Hully

8407100637 B40530
PDR ADDCK 05000352
PDR

D503