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LEGAL ASSISTANCE

# Legal Environmental Assistance Foundation (LEAF)

1102 Healey Building, 57 Forsyth St., Atlanta, GA 30303 (404/688-3299)

July 26, 1984

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Morton B. Margulies, Esquire, Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Mr. Gustave A. Linenberger, Jr.  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Oscar H. Paris  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

In the Matter of  
Georgia Power Company, et al.  
(Vogtle Electric Generating Plant, Units 1 and 2)  
Docket Nos. 50-424 and 50-425 (OL)

Dear Sirs:

Upon reviewing the Westinghouse proprietary report regarding Applicant's modification of the primary loop system in VEGP, Campaign for a Prosperous Georgia hereby withdraws CPG-9.

Applicant has furnished us with supplementary information regarding CPG-10 as well. Because the majority of our environmental qualification concerns were not addressed in this supplement, we stand on CPG-10 as previously submitted. For example, Applicant did not address our concerns regarding use of integrated dose rates, nor did it discuss synergistic effects of oxygen concentration. We are also concerned that Applicant has undertaken dry heat tests only, whereas accident conditions most often involve steam or higher humidity. FSAR Table 3.11.B.3-1 (Sheet 11). This omission is significant as most materials degrade more quickly in a humid environment. Regarding the hydrogen recombiners, though the unit's components have been tested, the unit as a whole remains untested. We were unable to review the Post-Irradiation Test Program for the recombiners as this information was excluded as proprietary material.

As Applicant has already undertaken the necessary steps to procure new motors to replace those Limitorque Motor Operators which failed earlier environmental qualification tests, we will not raise this issue in future proceedings. Likewise, as Applicant's affiant states that there are no terminal blocks in safety related applications inside the Vogtle containment and those outside containment that are necessary for accident mitigation will not be

Central Appalachian Office  
602 Gay St., Suite 307  
Knoxville, TN 37902

8408010267 840726  
PDR ADOCK 05000424  
Q PDR

A Public Interest Law Firm

Alabama Office  
2330 Highland Ave. S.  
Birmingham, AL 35205

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exposed to a steam environment. we will not pursue the issue of environmental qualifications of terminal blocks in future proceedings.

Sincerely,

Laurie Fowler  
LEAF General Counsel

cc: Service List