

358

PHILA. ELEC. CO.
Limerick Gen Sta. Units 1 & 2.

Docket # 50-352, 353.0L
May 30, 1984

SUPPLEMENT TO R.L. ANTHONY/FOE MOTION VS. APPLICANT'S MOTION FOR PARTIAL DECISION AND LOW POWER LICENSE, AND SUBMISSION OF CONTENTIONS ON NEW MATTER, DATED 5/10/84.

Contention 11. PECO has moved uranium fuel to the Limerick site without waiting for a decision by the Commission on our appeal, dated 4/24/84, 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 (HELBLE) 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°F 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 FSAR Chap. 15 analysis. In addition the effects of HELBLE 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. 6.2-3

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 "() shortcomings, precluded... assurance... construction infirmities detected...
cc: Judge P. G. Cole, Morris.

840825 1471 840530
PDR ADOCK 05000352
PDR
G

DSQ3

1717 "H" ST, N.W., 4
TUES, APR. 24, 1984 38

(SLIDE.)

MR. EISENHUT: Limerick. We are now a little farther along in time. You recall that Limerick was proposing that they would be ready to load fuel late this summer. There is a very, very lengthy hearing process --

COMMISSIONER ASSELSTINE: Let me stop you there, Darrell. You are right. The Applicant's official fuel load date is August, 1984 but at the end of January the staff had estimated construction completion would not occur until April to June of 1985. Who is right?

MR. DENTON: Time will tell.

MS. EISENHUT: Time will tell.

MR. DENTON: More often than not, the staff is correct.

COMMISSIONER ASSELSTINE: That's right.

MR. DENTON: My own opinion is I don't think this plant will really be impacted by this process but when we get more than six months difference, we try to work out with the company a better understanding of dates and I don't know where we stand with Limerick.

MR. EISENHUT: We haven't had the discussion but this is one of the plants we will have the discussion because of the big difference. I should point out on the other hand though some of these plants where we have a big delta the utility in fact on this list the utility is working one