

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
GEORGIA POWER CO., et al.)
)
(Vogtle Electric Generating Plant,)
Units 1 and 2))

'84 OCT -1 P2:51

Docket Nos. 50-424 and 50-425

OFFICE OF SECRETARY
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BRANCH

CAMPAIGN FOR A PROSPEROUS GEORGIA/GEORGIANS AGAINST NUCLEAR ENERGY
RESPONSE TO MEMORANDUM AND ORDER ON SPECIAL PREHEARING CONFERENCE

CPG/GANE recognizes that this is not the appropriate time to appeal the Board's Order; here we intend to clarify our position regarding Contentions 10 and 11 and highlight some points overlooked by the Board in issuing the Order.

Regarding Contention 10.2: In its FSAR at 3.11.B.3-1 Sheet 11 Applicant does state that "synergistic effects should be considered in the accelerated aging of the program," yet the FSAR provides no details on testing methods or results. CPG/GANE did not limit this contention to a consideration of synergistic effects on cables only; rather it applied to any component containing PE or PVC plastics. It would be impossible for CPG/GANE to identify all of the components containing these materials but the Applicant should be aware of these and clearly identify them in the FSAR.

In his supplemental affidavit filed June 27, 1984, W. C. Ramsey stated that Applicant did consider synergistic effects of heat and radiation on electric cable: "Cable was subjected first to circulating air oven aging, then to gamma radiation in air. An inert atmosphere was not used." As CPG noted in its response filed July 26, 1984, the conditions of temperature, time, humidity and oxygen concentration were either not stated or were not controlled in this testing.

In light of these omissions, Applicant has failed to demonstrate an adequate program in this area. All components that contain materials known to be sensitive to synergistic effects must be tested completely and thoroughly and test results and

procedures should be made available for review by Co-Petitioners.

For these reasons, we object to the Board's denial of Contention 10.2. As we have provided a basis for our concerns regarding synergism, we respectfully request the Board to amend its order.

Regarding Contention 11: The Board maintains that Petitioners have not indicated in what specific manner Applicant's measures pertaining to corrosion effects including stress corrosion cracking are inadequate. CPG has, in fact, made its objections clear. At the Special Prehearing Conference, CPG's Dr. Howard Deutsch cites the FSAR 5.4.2-9 as stating that "[r]ecent operating experience...has revealed areas on secondary surfaces where the localized corrosion rates are significantly greater than the low general corrosion rates." Dr. Deutsch therefore concluded that in this area, both intergranular stress corrosion and tube wall thinning were experienced in localized areas. (Transcript at 80-83)

In CPG's Second Amendment to Contention 11, filed on June 18, 1984, we again state these concerns and relate them to the serious problems plaguing other Westinghouse generators. This Amendment also sets forth our concern with the all volatile treatment (AVT) which Applicant contends eliminates corrosion problems.

The Amendment reads in part:

"Successful AVT operation requires maintenance of low concentrations of impurities in the steam generator water..." VEGP FSAR 5.4.2-9 However, the details of how low these concentrations must be, and how they will be maintained, are not adequately addressed by the applicant. The applicant expresses an apparent lack of confidence in the AVT technology in the following, quoted from the above section:

"(T)he AVT program should minimize the possibility for recurrence of intergranular corrosion in localized area..."

"A comprehensive program of steam generator inspections...should provide for detection of any degradation that might occur in the steam generator tubing."

Use of the language "should minimize" and "should provide" demonstrates uncertainty. An adequate solution to this problem would inspire confidence that the program "will" eliminate the corrosion and "will" provide for

detection of degradation.

As CPG has addressed the inadequacies of Applicant's corrosion control measures, we respectfully maintain that the Board's elimination of corrosion effects as a subject of Contention 11 is inappropriate and should be amended.

Respectfully submitted,

Laurie Fowler

Laurie Fowler for:

Legal Environmental Assistance Foundation

Attorney for Co-Petitioners
Campaign for a Prosperous Georgia and
Georgians Against Nuclear Energy

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CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing Response to the Board's Memorandum and Order on Special Prehearing Conference and Notice of Appearance have been served to all parties of record in this proceeding by deposit with the United States Postal Service in the City of Atlanta for delivery by Express Mail or by first class mail this the 27th day of September, 1984.

Respectfully submitted,

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