Contention 10.1 (Integrated Dose v. Dose Rate)

10.1-7 Applicants stated in their first response that they would prepare a "list that will identify the polymer materials contained in safety related equipment at Plant vogtle that will be exposed for the normally expected radiation environment ...". This list has not been made available to us and at this point represents an inadequate response.

10.1-8 Intervenors do not know what the term "each specific PVC or polyethyene polymer" means and therefore can not answer this question. These polymer names refer to chemical compositions of these materials and can not be identified beyond that composition.

10.1-9 No substantial information was provide by the documents produced by the applicants and there is no basis to supplement our response.

Contention 10.3 (Mulitconductor Configurations)

10.3-9 Reference 15, SAND83-0792A.

10.3-10. At this time intervenors only know of this one case, but feel that it may be an example of a more general problem.

10.3-11.

10.3-3. See answer above (10.3-10).

10.3-4. Intervenors do not know the answer to this question.

10.3-5. These conditions can be found in the reference cited in 10.3-10 above.

10.3-7. Intervenors contend that EPR insulation also performs substantially worse, see 10.3-9 above.

Contention 10.5 (Solenoid Valves)

10.5-9. Intervenors do not know the exact conditions the valves had been exposed to prior to testing.

10.5-10. To the best of knowledge the test temperature did not exceed 400 degrees Fahrrenheit.

10.5-12. Intervenors do not know what specific tests performed by ASCO are being referred to in this question. However, ASCO has reported that its own testing program (March 1982) has revealed some solenoid valves to be unqualified.

Contention 10.7 (Hydrogen Recombiners)

10.7-4. VEPG FSAR 6.2.5.4.1 summarizes the testing program for the hydrogen recombiners, and radiation testing is not mentioned.

10.7-5. Intervenors do contend that the hydrogen recombiner must be qualified as a unit. If only the components of all equipment and materials must be qualified, where would this logically stop? For example, for the solenoid valves discussed in contention 10.5, why not just test the component parts? If the component parts did not fail under the test conditions, would the valve be qualified? If this is so then how the parts are assembled, and the design of the unit as a whole would not be relevant. Clearly this does not make sense.

Contention 11 (Steam Generator)

11-15.

11-3. Intervenors do not know of any NRC documents that define or explain bubble collapse.

11-4, 11-5, 11-6, 11-7.Intervenors cannot answer these interrogatories at this time. Intervenors will provide applicants with a response as soon as possible.

11-8. This has been stated in NRC's Unresolved Safety Issues Summary, August 20,1982, and appears to be a well known fact in the nuclear industry. For example in testimony before the Maine Public Utilities Commission, Mr. David Schlissel stated on September 12, 1984 certain Westinghouse steam generators "... experienced a large number of tube defect faliures. ...These tube vibration and fretting problems had not been anticipated... .

11-9. On the basis that it nas been observed in the past with other generators, and that there is almost no operating experience with Model F generators to verify that it will not be a problem with this system.

11-10, 10-11. Intervenors cannot answer these interrogatories at this time. Intervenors will provide applicants with a response as soon as possible.

11-12. Intervenors do not content that vibration induced fatigue cracking is only associated with non-Westinghouse steam generators. See 11-8 above.

Contention 12 (Cooling Tower Releases)

12-20. The salt drift rate estimate in NRC question E290.8 is 17 lb/acre year based on an expected drift rate of 0.008%. If the guaranteed rate of 0.03% is used for this calulation then the result is about 65 lb/acre year. In the letter to Mr. Denton of the NRC the original estimate of 305 lb/acre/year (2010 lb/day) was shown along with a revised estimate of 221 lb/day (by our calculation this is about 33 lb/acre/year). Why do these differ? If the guaranteed drift rate of 0.03% were used this new estimate would be about 125 lb/acre/year. Why not use the guaranteed rate? None of these salt drift estimates are based on empirical evidence of mearsured rates and may be very poor estimates of the true salt drift rates.

12-21. Most of the salt is NaCl and is probably the only salt of concern. After looking at the information available to us the intervenors have concluded that the rate of salt drift that would be harmful to vegatation is not known accurately. However, in the VEGP-OLSER-Q-E290.3, a salt drift rate of 305 lb/acre/year was admitted to be in the range of potential damage to vegatation. Also Ogata et al (J. Envir. Qual., Vol. 10, 406(1981)) have shown that severe damage to plants can occur at salt treatment levels of about 35 lb/acre (direct application).

12-22. No specific types were meant.

12-23. Harm would include leaf wilt, reduced growth, and reduced yield of crop.

12-24. See 12-21 above.

12-25. Cl(2) is free available chlorine; Cl(-) is chloride; HOCl, OCl(-), and ClO(3)(-) are combined available chlorine.

12-26. It would not differ in any significant way to the best of our knowledge.

12-27. The intervenors would estimate that the hydrolysis would be nearly complete in appoximately one million microseconds.

12-28. Intervenors cannot answer this interrogatory at this time. Intervenors will provide applicants with a response as soon as possible.

12-29. The "chlorine" could be in the following forms; Cl(2) gas, Cl(2) solution, or any of the forms of combined available chlorine shown in 12-25.

12-30. Intervenors cannot answer this interrogatory at this time. Intervenors will provide applicants with a response as soon as possible.

12-31. Intervenors cannot answer this interrogatory at this time. Intervenors will provide applicants with a response as soon as possible.

12-32. Intervenors cannot answer this interrogatory at this time. Intervenors will provide applicants with a response as soon as possible.

12-33. See 12-21.

12-34. No significant information was provided and therefore the responses can not be supplemented based on these documents.

B. General Interrogatories.

Dr. Howard M. Deutsch

a. Contention 12

b. Chlorine release

c. Georgia Institute of Technology, BS Chemistry 1962, PhD Chemistry, 1967.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
GEORGIA POWER CO., et al.	)	Docket Nos. 50-424 and 50-425
	)	
(Vogtle Electric Generating Plant, Units 1 and 2)	)	

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing supplement to Intervenors' Responses to Applicants' second set of interrogatories and requests to produce were served by deposit with the U. S. Postal Service in the City of Atlanta with first class postage attached to be delivered to the Secretary of the Commission, the members of the Licensing Board and all others listed below, this seventh day of February, 1985.

Tim Johnson
Campaign for a Prosperous Georgia

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