

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

1/17/85

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In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.

(Comanche Peak Steam Electric
Station, Units 1 and 2)

Docket Nos. 50-445
and 50-446

(Application for an
Operating License)

CASE'S 1/17/85 SUPPLEMENT TO CASE'S ANSWER TO
APPLICANTS' MOTION FOR SUMMARY DISPOSITION
REGARDING LOCAL DISPLACEMENTS AND STRESSES

Pursuant to the Board's 10/31/84 Memorandum (Multiple Filings), CASE (Citizens Association for Sound Energy), Intervenor herein, files this, its 1/17/85 Supplement to CASE's Answer to Applicants' Motion for Summary Disposition Regarding Local Displacements and Stresses.

This pleading was necessitated by new and significant information which supports CASE's position -- information which was not available until very recently. With regard to the four items which the Board has stated must be satisfied, we offer the following:

(1) Relevance: This is relevant to, and gives further support to, CASE's 10/9/84 Answer to Applicants' Reply to CASE's Answer to Applicants' Motion for Summary Disposition Regarding Local Displacements and Stresses (see Affidavit of CASE Witness Jack Doyle attached thereto, especially pages 4 through 11).

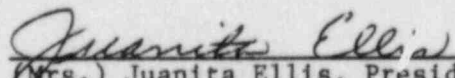
(2) What new material in the last round filing is being responded to: We are supplementing CASE's response to point 2 of Applicants' 9/28/84 Reply to CASE's Answer to Applicants' Motion for Summary Disposition Regarding Local Displacements and Stresses, at pages 5 through 9 (referencing Finneran Affidavit at pages 2 through 6).

(3) Why the party was unable to anticipate this material in its last filing: As mentioned previously, this is new and significant information which was not available at that time (see SSINS No. 6835, IN 84-87, NRC Information Notice No. 84-87: PIPING THERMAL DEFLECTION INDUCED BY STRATIFIED FLOW, December 3, 1984, copy attached).

(4) The safety significance of the point that is being made: See full discussion in CASE's 11/15/84 Motion for Reconsideration of Board's 10/31/84 Memorandum (Multiple Filings). As part of that discussion, we stated that it is our understanding that these Motions for Summary Disposition were to have been one of the primary means by which Applicants hoped to convince the Board that the entire plant had been designed properly. These specific items were chosen by the Applicants. In addition, the new and significant information discussed herein confirms and demonstrates graphically one of CASE's points. As stated by Mr. Doyle in his attached Affidavit: "... 15 minutes after cool fluid was introduced into a hot pipe, the cool fluid caused a temperature differential between the top and bottom of the pipe, resulting in a displacement of the pipe which caused severe damage to several feedwater pipe hangers and snubbers." And the Information Notice states: "The difference in temperature between the top and bottom of the pipe causes the pipe to bend and may pull hangers out of their supports." (Emphasis added.)

CASE's Supplement is in the form of the attached Affidavit of CASE Witness Jack Doyle.

Respectfully submitted,



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