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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
ING & SERVICE
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
GPU NUCLEAR CORPORATION) Docket No. 50-219-OLA
) (Tech. Spec. 5.3.1.B)
)
(Oyster Creek Nuclear Generating Station)) ASLBP No. 96-717-02-OLA

**GPUN'S ANSWER TO SUPPLEMENTAL PETITION OF
NUCLEAR INFORMATION AND RESOURCE SERVICE, OYSTER CREEK
NUCLEAR WATCH, AND CITIZENS AWARENESS NETWORK**

I. INTRODUCTION

GPU Nuclear Corporation ("GPUN" or "Licensee") submits this Answer opposing the Supplemental Petition of Nuclear Information and Resource Service, Oyster Creek Nuclear Watch, and Citizens Awareness Network ("Supp. Pet."), which these organizations ("Petitioners") filed on July 18, 1996. Petitioners have submitted a single contention challenging GPUN's application to amend Technical Specification 5.3.1.B of the operating license for the Oyster Creek Nuclear Generating Station ("Oyster Creek"). This contention is vague and is not supported by a factual basis or expert opinion as required by the NRC's regulations. 10 C.F.R. § 2.714(b)(2) and (d)(2). Accordingly, both the contention and Petitioners' request for hearing should be dismissed.

GPUN has applied to amend Technical Specification 5.3.1.B so that "(t)he shield plug and the associated lifting hardware may be moved over irradiated fuel assemblies that are in a dry

shielded canister within the transfer cask in the cask drop protection system."¹⁷ Petitioners contend that this application fails to provide defense in depth and satisfy the regulatory guidance of NUREG-0612.

Petitioners provide no credible basis for their claim that GPUN's application violates the defense-in-depth principle or the guidance in NUREG-0612. Petitioners' contention appears predicated on their misconception that NUREG-0612 absolutely prohibits any movement of a heavy load over spent fuel, whereas the guidance in NUREG-0612 in fact calls for safe load travel paths and procedures to assure "to the extent practical" that heavy loads are not carried over or near irradiated fuel. Petitioners fail to identify any deficiency in the safe load travel paths and procedures that GPUN is employing, or to provide any explanation of how it is practical to plug a dry shielded canister ("DSC") without moving the shield plug over fuel in the DSC. Thus, Petitioners have failed to establish the existence of a genuine issue. Petitioners' additional assertions that degraded fuel will be placed in the DSC or that the shield plug could be dropped on the spent fuel pool liner are also unsupported and nothing more than incorrect speculation.

II. STANDARDS FOR ADMISSIBILITY OF CONTENTIONS

The Commission's Rules of Practice, at 10 C.F.R. § 2.714, set forth the requirements for the admission of contentions. The regulations require that an admissible contention consist of (1)

¹⁷ Oyster Creek Technical Specification Change Request No. 244, April 15, 1996 (hereinafter "Tech. Spec. Change Request") at second unnumbered page showing the actual text changes to the Technical Specifications (In citing to pages of the Tech. Spec. Change Request, GPUN is not counting the transmittal letter and certificates of service). Note that the Technical Specification change request is specifically limited to allow movement of the shield plug "over irradiated fuel assemblies," not "over or near irradiated fuel" (emphasis added) as Petitioner's mistakenly assert. Supp. Pet. at 2.

a specific statement of the issue to be raised or controverted; (2) a brief explanation of the bases for the contention; (3) a concise statement of the alleged facts or expert opinion supporting the contention on which the petitioner intends to rely in proving the contention at any hearing; and (4) sufficient information to show that a genuine dispute exists on a material issue of law or fact. 10 C.F.R. § 2.714(b)(2). Failure of a contention to comply with any of these requirements is grounds for dismissing the contention. 10 C.F.R. § 2.714(d)(2); Sequoyah Fuels Corp. (Gore, Oklahoma Site Decontamination and Decommissioning Funding), LBP-94-8, 39 NRC 116, 117-18 (1994).

The rules governing the admissibility of contentions, 10 C.F.R. § 2.714(b) and (d) are the results of 1989 amendments "to raise the threshold for admission of contentions." 54 Fed. Reg. 33,168 (Aug. 11, 1989); see Arizona Public Service Co. (Palo Verde Nuclear Generating Station, Units 1, 2, & 3), CLI-91-12, 34 N.R.C. 149, 156 (1991); Long Island Lighting Co. (Shoreham Nuclear Power Station, Unit 1), LBP-91-35, 34 N.R.C. 163, 167 (1991). The Commission has made clear that these new requirements are to be enforced rigorously; a Licensing Board is not to overlook any deficiency in a contention or assume the existence of missing information. Palo Verde, CLI-91-12, 34 N.R.C. at 155-56; Long Island Lighting Co. (Shoreham Nuclear Power Station, Unit 1), LBP-91-39, 34 N.R.C. 273, 279 (1991).

Further, as stated in the Federal Register notice providing an opportunity for hearing on GPUN's application, the issue raised in the contention must be within the scope of the amendment under consideration. 61 Fed. Reg. 20,842, 20,843 (May 8, 1996). A contention is not cognizable

unless it is material to a matter that is within the scope of the issues set forth in the Commission's Notice of Opportunity for Hearing in the proceeding. See Northern Indiana Public Service Co. (Bailly Generating Station, Nuclear 1), ALAB-619, 12 N.R.C. 558, 565 (1980); Portland General Electric Co. (Trojan Nuclear Plant), ALAB-534, 9 N.R.C. 287, 289-90 n.6 (1979); Public Service Co. (Marble Hill Nuclear Generating Station, Units 1 and 2), ALAB-316, 3 N.R.C. 167, 170-71 (1976).

A contention must also provide specific references to documents or other sources which support the contention and on which the petitioner intends to rely. 10 C.F.R. § 2.714(b)(2)(ii). The Commission has made clear that this requirement has the effect of overturning prior precedent which had held that section 2.714 does not require a petitioner to describe facts which would be offered in support of a proposed contention. 54 Fed. Reg. at 33,170. See Arizona Public Service Co. (Palo Verde Nuclear Generating Station, Units 1, 2 & 3), LBP-91-19, 33 N.R.C. 397, 398-402, 405-09, vacated in part on other grounds, CLI-91-12, 34 N.R.C. 100 (1991). The Rules of Practice now require that a petitioner include facts in support of its position in order to demonstrate that a genuine dispute as to a material issue of law or fact exists.^{2/} 54 Fed. Reg. 33,170. An intervention petitioner has an ironclad obligation to examine the publicly available documentary material pertaining to the facility in question with sufficient care to enable the petitioner to uncover any information that could serve as the foundation for a specific contention. Duke Power Co. (Catawba Nuclear Station, Units 1 and 2), ALAB-687, 16 NRC 460, 468

^{2/} The Commission has defined a dispute as to a "material" issue as meaning that the "resolution of the dispute would make a difference in the outcome of the licensing proceeding." 54 Fed. Reg. at 33,172.

(1982), vacated in part on other grounds, CLI-83-19, 17 NRC 1041 (1983). A contention should not be admitted "where an intervenor has no facts to support its position and where the intervenor contemplates using discovery or cross-examination as a fishing expedition which might produce relevant supporting facts." 54 Fed. Reg. at 33,171.

A petitioner who satisfies the interest requirement will be granted intervention only if he also states at least one contention within the scope of the proceeding with a proper factual basis (the one good contention rule). Shoreham, LBP-91-39, supra, 34 NRC at 284. Where a mandatory hearing is not required, Licensing Boards should "take the utmost care" to assure that the one good contention rule is met because, absent successful intervention, no hearing need be held. Cincinnati Gas & Electric Co. (William H. Zimmer Nuclear Power Station), ALAB-305, 3 NRC 8, 12 (1976).

III. PETITIONERS' CONTENTION FAILS TO SATISFY PLEADING REQUIREMENTS

A. Petitioners' General Contention is Too Vague to Satisfy Pleading Requirements

Petitioners' contention states:

The GPUN application fails to provide defense-in-depth against the risks of a heavy load drop onto irradiated fuel and fails to satisfy NRC regulatory guidance as provided in NUREG-0612 "Control of Heavy Loads At Nuclear Power Plants" pertaining to defense-in-depth risk management to assure that a heavy load drop does not impact or encroach on irradiated fuel.

Supp. Pet. at 2. This general allegation is too vague. It does not indicate how GPUN supposedly violates NRC guidance on defense-in-depth and hence it fails to satisfy the specificity requirement

in 10 C.F.R. 2.714(b)(2)(iii). As demonstrated below, Petitioners' statement of the basis accompanying this contention fails to cure this deficiency or provide the requisite factual support to demonstrate the existence of a genuine, material dispute.

B. Petitioners' Statement of Basis Is Vague and Fails to Establish a Genuine Dispute as to a Material Issue of Law or Fact

1. Petitioners' Misreading of NUREG-0612 is Not a Basis for a Contention

The gravamen of Petitioners' statement of basis is that NUREG-0612 prohibits any heavy load movements over irradiated spent fuel elements, and, ergo, that any lift of a heavy load over any spent fuel is a per se violation of NUREG-0612 and the defense-in depth principle. This position clearly misconstrues NUREG-0612 and fails to establish a valid basis for Petitioners' contention.

Petitioners state:

Central to the defense-in-depth approach NRC directs in NUREG-0612 "Control of Heavy Loads At Nuclear Power Plants" that all plants are to establish "safe load paths and procedures to assure to the extent practical that heavy loads are not carried over or near irradiated fuel or safe shutdown equipment."

Supp. Pet. at 3, citing U.S. Nuclear Regulatory Commission, Generic Letter 85-11, "Completion of Phase II of 'Control of Heavy Loads at Nuclear Power Plants' NUREG-0612," at enclosure 1, June 28, 1985 (hereinafter "Generic Letter 85-11"). Petitioners, however, appear to ignore the words "to the extent practical" in the NRC letter and guidance. Instead of acknowledging or addressing these words, Petitioners proceed to charge that "GPUN's proposed activity to move the

shield plug over as many as 52 irradiated [sic] in the Dry Shield Cask [sic] (DSC) is in direct violation of the NRC defense-in-depth guidance as provided in NUREG-0612 . . . " Supp. Pet. at 3. Petitioners further charge that:

NUREG-0612 specifically provides that the defense-in-depth approach for controlling the movement of heavy loads is to include the prohibition of specified movement activity and the restriction of load limits in order to prevent heavy load drops from resulting in unacceptable damage to irradiated fuel.

Id. (emphasis added). Petitioners continue that "NUREG-0612 implements the defense-in-depth principle by restricting, or prohibiting activities potentially resulting in an accident impacting irradiated fuel." Id. (emphasis added).

Contrary to Petitioners' view, NUREG-0612 does not say that a heavy load cannot be moved over spent fuel. It does not provide an absolute prohibition on movement of heavy loads over spent fuel. Rather it states that all plants should "(d)efine safe load travel paths through procedures and operator training so that to the extent practical heavy loads avoid being carried over or near irradiated fuel or safe shutdown equipment." ³¹ U.S. Nuclear Regulatory Commission, NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants," at 5-2, July 1980 (emphasis

³¹ Petitioners' basis includes additional mischaracterizations. They state that GPUN is required by law under 10 C.F.R. 50.36(c)(1) to establish and maintain safety limits governing activities potentially affecting fuel rod cladding and fuel pool steel liner integrity. Supp. Pet. at 2. Section 50.36(c)(1) makes no reference to fuel rod cladding or the fuel pool steel liner. In the same context, Petitioners characterize Technical Specification 5.3.1.B as establishing "safety limits." Id. Note that Technical Specification 5.3.1.B is a "design feature" under 10 C.F.R. § 50.36(c)(4), not a "safety limit" under 10 C.F.R. § 50.36(c)(1) as Petitioners mistakenly assert. In addition, since a fuel assembly weighs 800 pounds, rather than 500 pounds as asserted in the Supp. Pet. at 1, the load limit is not being increased by 28 times as asserted in the Supp. Pet. at 2, 5.

added) (hereinafter "NUREG-0612"); see also Generic Letter 85-11 at enclosure 1 (essentially repeating the recommendation of NUREG-0612).

GPUN has defined safe load paths and procedures to assure "to the extent practical" that heavy loads are not carried over or near irradiated fuel. The NRC has previously reviewed these actions and determined that Oyster Creek is in compliance with NUREG-0612.

By Generic Letter 85-11 dated June 81 [sic], 1985, the staff concluded that the Oyster Creek station along with other plants has provided sufficient protection so that the risk associated with potential heavy-load drops is acceptably small and that the objective identified in Section 5.1 of NUREG-0612 for providing "maximum practical defense in depth" is satisfied.

U.S. Nuclear Regulatory Commission, NUREG-1382, "Safety Evaluation Report - related to the full-term operating license for Oyster Creek Nuclear Generating Station," at 9-4, Jan. 1991. Petitioners make no attempt to identify any deficiency in the actions that GPUN previously implemented to satisfy NUREG-0612. They similarly identify no deficiency in the procedures described in the current application, which include the use of a safe load travel path, mechanical stops to prevent travel of the crane outside the analyzed load path, use of detailed operating procedures and training.⁴ Tech. Spec. Change Request at second, fourth, and fifth unnumbered pages.

Nor do Petitioners provide any basis to suggest that any further limitation on the movement of heavy loads is practical. The only time the shield plug is moved over spent fuel is when it is lowered over the spent fuel loaded in the Dry Shielded Canister ("DSC") to provide radiological

⁴ A number of improvements have also been made to the overhead crane, which is inspected, tested, and maintained in accordance with ANSI standards. See Tech. Spec. Change Request at fourth and fifth unnumbered pages.

shielding for that specific spent fuel. This step cannot be avoided if the spent fuel is to be shielded, and shielding is required in other regulations. See 10 C.F.R. §§ 72.104 (criteria for direct radiation from Independent Spent Fuel Storage Installation ["ISFSI"] operations); 72.106 (dose limits for individual at boundary of ISFSI controlled area); 72.126 (design requirements for ISFSI radiological protection); 72.128 (shielding requirements for spent fuel storage systems); and 72.236 (shielding requirements for spent fuel storage cask approval); 10 C.F.R. § 71.47 (external radiation standards for transport packages). Movement of the shield plug over spent fuel is therefore strictly limited to the extent practical, in compliance with NUREG-0612, as required to meet other Commission regulations, and to protect public health and safety.

Petitioners' assertion that GPUN fails to satisfy NUREG-0612 therefore relies on an erroneous reading of Commission guidance and is without basis. It is also unsupported by Petitioners by any documentation or any expert opinion, and thus does not comply with the pleading requirement of providing the alleged facts or expert opinion which support the contention together with references to specific sources and documents. 10 C.F.R. § 2.714(b)(2)(ii). Most importantly, it fails to establish the existence of a genuine, material dispute.

2. Petitioners' Assertion that Heavy Loads will be Moved Over Degraded Spent Fuel is Erroneous and Unsupported by Any Documentation or Expert Opinion

In addition to its misreliance on NUREG-0612, Petitioners also allege in their basis that GPUN's application is deficient because "the shield plug movement could occur over potentially

degraded fuel assemblies loaded into the DSC." Supp. Pet. at 4. This allegation is unsupported and inaccurate, and thus fails to meet pleading requirements.

The documents referenced by Petitioners provide no support for the proposition that GPUN will load degraded spent fuel elements into DSCs and move the shield plug over them. In fact, the Certificate of Compliance for the NUHOMS-52B system to be used at Oyster Creek specifically prohibits loading the DSC with, inter alia, any unchanneled assemblies or assemblies with known or suspected gross cladding breaches. U.S. Nuclear Regulatory Commission, "Certificate of Compliance 72-1004, "Standardized NUHOMS-24P and NUHOMS-52B," at A-10, Dec. 1994.⁵² In short, Petitioners have not provided any documentation or expert opinion that indicates GPUN will load degraded spent fuel assemblies into DSCs, and publicly available documentation shows that this is, in fact, prohibited.

Nor is there any basis for Petitioners' suggestion "that the material condition of an undetermined number of irradiated fuel assemblies in the storage pool at least ten years have undergone documented deterioration to the fuel rod cladding and fuel bundle assembly integrity." Supp. Pet. at 4. This suggestion is not supported by any facts, documentation, or expert opinion. In particular, neither of the two documents referenced by Petitioners provides any meaningful support for Petitioners' concern. The Licensee Event Report⁵³ cited by Petitioners specifically

⁵² GPUN has included this prohibition in its procedures for DSC loading through a fuel assembly specification requirement that "(e)ach BWR Fuel assembly will have a channel (need not be clipped) and will be verified as physically intact with no known fuel failure history." GPUN, Oyster Creek Nuclear Generating Station Procedure, "Fuel Loading/Unloading For Dry Shielded Canister," Procedure Number Special 95-006, at 4.0, Nov. 1995.

⁵³ GPUN, Oyster Creek Licensee Event Report, "Fuel Clad Failures Due to Pellet/Clad Interactions," Feb. 6, 1987 (hereinafter "Pellet/Clad Interactions LER"), cited by Petitioners in Supp. Pet. at 4.

shows that the damage to the forty-seven spent fuel elements occurred in the reactor core during power operations as a result of pellet/clad interaction.²¹ Pellet/Clad Interactions LER at 1-3. This occurrence was identified by GPUN from the radionuclide concentration in primary-system offgas monitoring and subsequent fuel sipping operations. *Id.* at 2.

Similarly, the structural failure of fuel assembly UD003Y occurred during movement of an assembly and occurred in an unchanneled fuel assembly. U.S. Nuclear Regulatory Commission, Daily Event Report, "Structural Failure of Fuel Assemble [sic]: Reportable Event Number 28954," at 1, June 16, 1995, cited by Petitioners in Supp. Pet. at 4. As documented above, unchanneled fuel elements are prohibited from being loaded into the DSC because of the license condition in the Certificate of Compliance for the NUHOMS system.

Thus, the specific documents referenced to support Petitioners' basis provide no support at all for the general assertion that fuel assemblies that may be loaded into DSCs are undergoing "documented deterioration" in the spent fuel pool. Petitioners provide no documentation or expert opinion that supports this assertion.

²¹ Furthermore, Petitioners do not identify why these assemblies create any problem, even if they were intended to be loaded into DSCs. Petitioners give no indication that pellet/clad interactions would make any difference in a heavy load analysis. The small cladding breaches from pellet-clad interaction would have allowed any fission product gases to escape long ago. Petitioners have failed to show how these assemblies, even were they eligible for loading in a DSC, would have any bearing on a heavy load analysis.

3. Petitioner's Assertion that the Shield Plug Could Strike the Pool Liner is Erroneous and Unsupported by Any Documentation or Expert Opinion

Petitioners' basis makes one additional claim in support of the contention -- that the shield plug could be dropped onto the fuel pool steel liner, could breach the steel liner, and thereby lead to "fuel pool drain down" which would result in damage to spent fuel stored in the pool. In particular, Petitioners state that they:

interpret NUREG-0612 to encompass a minimization of activities to include heavy load drops onto the fuel pool steel liner in the vicinity of the dry cask loading area resulting in a fuel pool drain down as such and event "impact" or encroach on irradiated fuel in storage racks by way of loss of coolant water.

Supp. Pet. at 4-5. This assertion also fails to satisfy pleading requirements because Petitioners fail to identify how the shield plug could possibly drop onto the fuel pool liner, and provide no documentation or expert opinion supporting the assertion. Petitioners' assertion fails to address, and is inconsistent with, the publicly available documentation relevant to the heavy load movement issue.

First, Petitioners do not provide any meaningful discussion or identify any plausible mechanism by which the shield plug could even be dropped in the first place. As Petitioners note, Supp. Pet. at 5, GPUN will use redundant shield plug lift cables (four independent steel cables bolted at four separate locations to the shield plug and at four separate locations on the transfer cask lifting yoke when any one cable alone can independently support the entire weight of the shield plug^{8/}), a crane safety factor of greater than 10 (recognized as significant in NUREG-0612

^{8/} VECTRA Technologies, Inc., Safety Analysis Report for the Standardized NUHOMS Horizontal Modular Storage System for Irradiated Nuclear Fuel, at 4.2-24, 5.1-4, June 1995 (hereinafter "NUHOMS SAR"); Tech. Spec Change Request at fifth unnumbered page.

at 5-8 and 5-9, C-3), procedures, operator training, and required inspections, all to ensure that a drop of the shield plug is not a credible event. Tech. Spec. Change Request at second unnumbered page. Petitioners do not identify what type of credible failure mechanism would allow four independent steel cables bolted at four separate locations to fail simultaneously. Rather than identify how all of these redundant safeguards could possibly be overcome to produce a drop of the shield plug, Petitioners provide only a vague allusion to "the human error issue or mechanical and/or electrical failure issues." Supp. Pet. at 6. This vague allusion without any meaningful discussion of likelihood, without any more specifics or any references to any documents or expert opinion, without discussion of how even human error could result in the failure of four independent cables, is simply insufficient to provide a basis to satisfy the pleading requirements for an admissible contention. Pleading requirements require Petitioners to provide sufficient information to show that a genuine dispute exists on a material issue of law or fact, and to back it up with a statement of the alleged fact or expert opinion supporting the contention on which the Petitioners intend to rely. 10 C.F.R. § 2.714(b)(2). Clearly, Petitioners have not done so.

Moreover, even if one were to somehow posit a drop of the shield plug, Petitioners have provided no basis for their assertion that it could impact the spent fuel pool liner. Shield plug movement over spent fuel is specifically confined to the Cask Drop Protection System ("CDPS") by the same safe load paths and crane rail stops that limit movement of the DSC and transfer cask. Tech. Spec. Change Request at second and fourth unnumbered pages; GPUN, Oyster Creek Updated Final Safety Analysis Report, at §§ 9.1.2.2.3 and 9.1.2.3.10 (1995) (hereinafter "Updated FSAR"). As attached Figure 1 from the Updated FSAR shows, the top of the CDPS is a steel

plate having a hole large enough to fit the transfer cask down into. Id. (Figure 9.1-11). The "transfer path for the cask centerline is on a controlled path width of six inches for cask centerline travel in the north-south and east-west directions (see Figure 9.1-11)" within the CDPS and "(m)echanical rail stops are installed to prevent overtravel of the crane." Id. at § 9.1.2.2.3; see also Tech. Spec. Change Request at second and fourth unnumbered pages. Because the centerline of the crane over the safe load path is strictly controlled, any tipping of the shield plug is physically limited to tipping into the center of the CDPS. Tipping out of the CDPS is not possible.

As attached Figure 2 from the Updated FSAR shows, under the top plate of the CDPS is a steel cylinder that funnels anything lowered into the CDPS into the dashpot section at the bottom. Updated FSAR at § 9.1.2.2.3 (Figure 9.1-6). The steel cylinder is capable of withstanding the drop-force of a 100-ton cask without breaching. Updated FSAR at §§ 9.1.2.2.3 and 9.1.2.3.10. In the event that the shield plug were dropped, it would never be able to reach the bottom plate of the CDPS because there would be insufficient clearance for the shield plug to physically pass between the wall of the CDPS and the transfer cask/DSC in the bottom of the steel cylinder. It is geometrically impossible for the shield plug, a disc about five and a half feet in diameter and about eight inches thick,^{9/} to fit in this annular cross section.^{10/}

^{9/} NUHOMS SAR at 4.2-10.

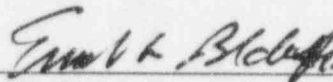
^{10/} Further energy absorption capability is provided at the bottom of the dashpot by a series of horizontal stainless steel pipe segments welded to the bottom head of the dashpot. Updated FSAR at § 9.1.2.2.3. The CDPS is designed and approved to structurally withstand the drop of a 100-ton cask without any impact on the spent fuel pool steel liner. Updated FSAR at §§ 9.1.2.2.3 and 9.1.2.3.10.

Petitioners do not address any of these facts. They essentially ignore the description of the CDPS in the Updated FSAR, and its mitigating effect, as well as the actions and design features described in the application to prevent a drop from occurring. Petitioners identify no documentation or expert opinion that would indicate that a drop of the shield plug is a credible event or that the liner could be impacted. Therefore, this assertion also fails to establish that a genuine dispute exists on a material issue of law or fact.

IV. CONCLUSION

For all of the above stated reasons, the Petitioners' contention should be rejected, and their petition should be dismissed.

Respectfully submitted,

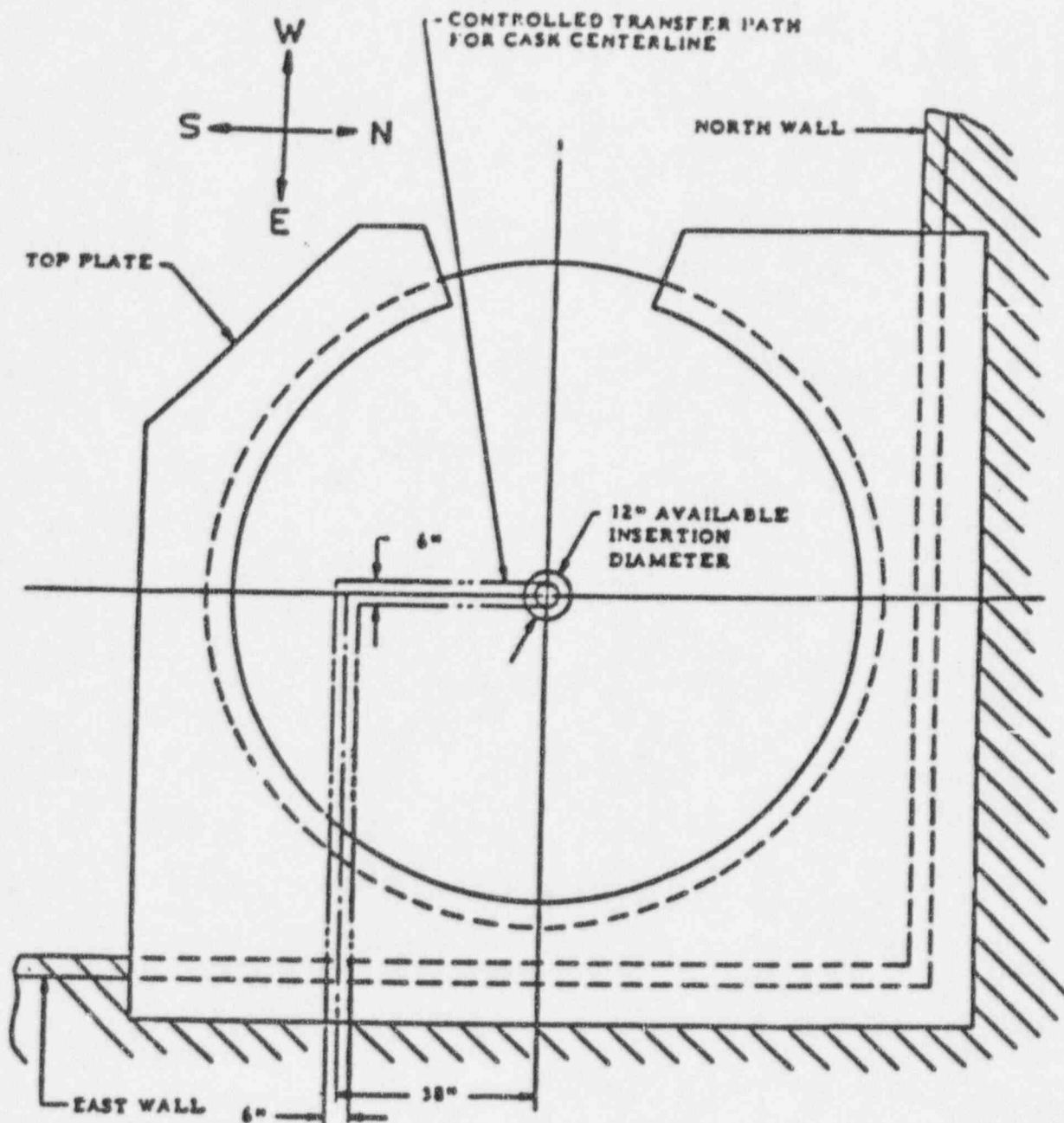


Ernest L. Blake, Jr.
David R. Lewis

SHAW, PITTMAN, POTTS & TROWBRIDGE
2300 N Street, N.W.
Washington, D.C. 20037-1128
(202) 663-8084

Counsel for Licensee

Dated: July 29, 1996



GW Nuclear

Oyster Creek

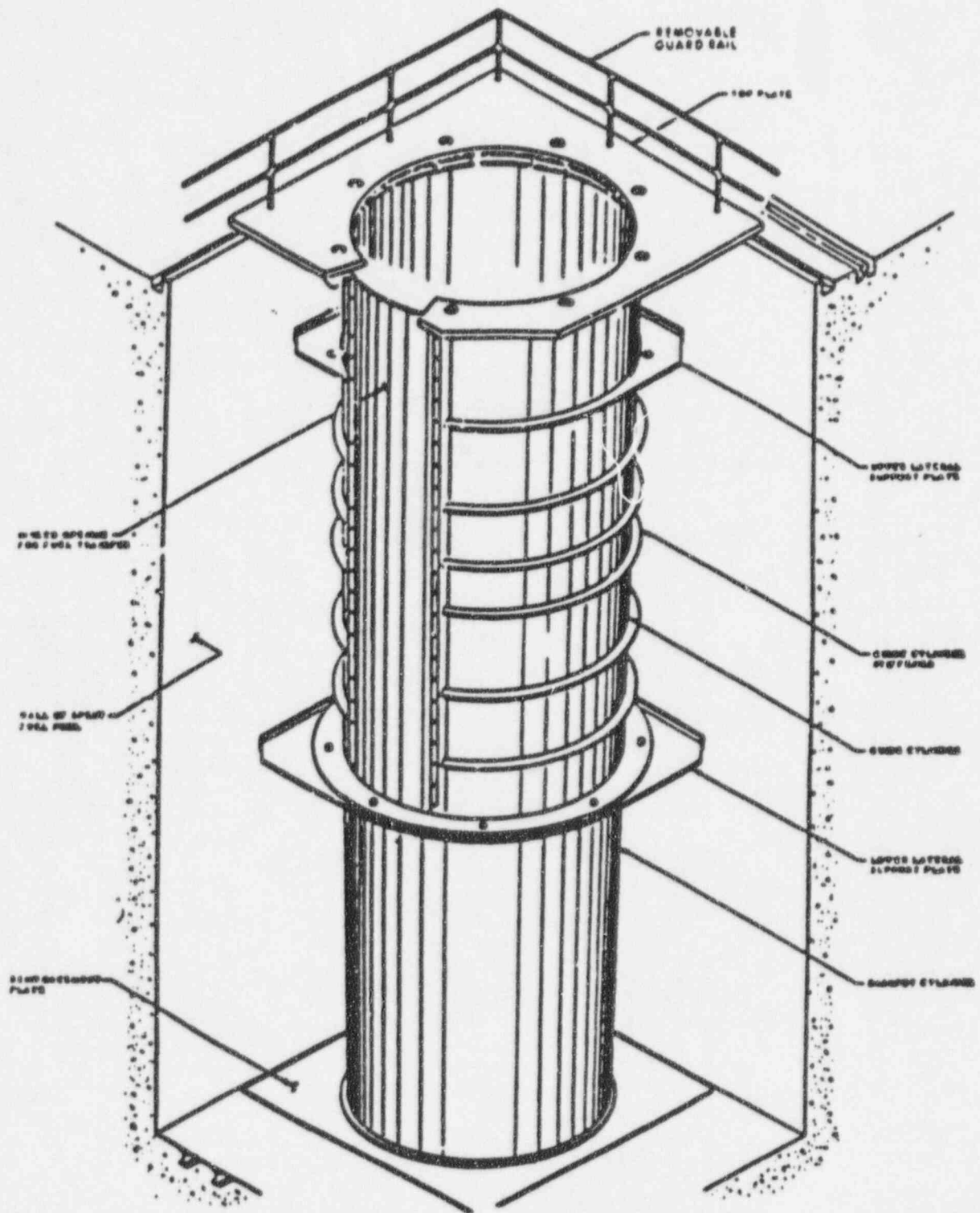
Transfer Path for Cask Centerline

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Fig. 8.1-11

Figure 1 - Cask Drop Protection System Top Plate



GRU Nuclear

Oyster Creek

Guide Structure and Dash Pot Assembly

Update - 5

12/90

Fig. 9.1-6

Figure 2 - Cask Drop Protection System (showing steel guide cylinder and dashpot)

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CERTIFICATE OF SERVICE

I hereby certify that copies of "GPUN's Answer to Supplemental Petition of Nuclear Information and Resource Service, Oyster Creek Nuclear Watch, and Citizens Awareness Network," dated July 29, 1996, were served upon the persons listed below by deposit in the United States mail, first class, postage prepaid, this 29th day of July, 1996. Where indicated by an asterisk, copies were also provided by facsimile transmission or e-mail.

*G. Paul Bollwerk, Chairman
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop T-3 F 23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Dr. Peter S. Lam
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop T-3 F 23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Dr. Charles N. Kelber
Administrative Judge
Atomic Safety and Licensing Board
Mail Stop T-3 F 23
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Adjudicatory File
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

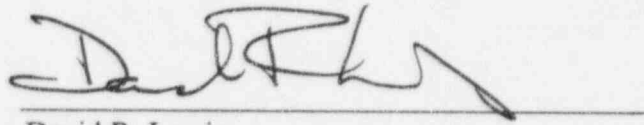
*Ann P. Hodgdon, Esq.
Richard G. Bachmann, Esq.
Office of the General Counsel
Mail Stop O-15 B 18
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Docketing and Service Branch
Office of the Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

*Paul Gunter
Nuclear Information and Resource Service
1424 16th Street, N.W., Suite 404
Washington, D.C. 20036

*William deCamp, Jr.
Oyster Creek Nuclear Watch
P.O. Box 243
Island Heights, New Jersey 08732

*Deborah Katz
Citizens Awareness Network
P.O. Box 83
Shelburne Falls, Massachusetts 01370



David R. Lewis

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