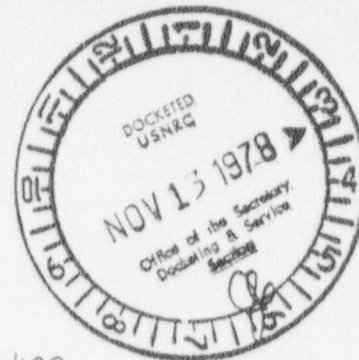


RELATED CORRESPONDENCE

NRC PUBLIC DOCUMENT ROOM
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
DAIRYLAND POWER COOPERATIVE)
(La Crosse Boiling Water Reactor))

Docket No. 50-409
Amendment to
Provisional Operating
License DPR-45

INTERVENOR'S RESPONSE TO APPLICANT'S INTERROGATORIES

Pursuant to 10 CFR 2.740(b), the Coulee Region Energy Coalition, Intervenor in Dairyland Power Cooperative's application for an Amendment to Provisional Operating License DPR-45, hereby submits the following answers in response to Applicant Dairyland Power Cooperative's Interrogatories:

1. Individuals who contributed to the answering of these interrogatories have submitted affidavits which are enclosed.
2. We have at present no expert witnesses who have agreed to testify at the hearings.
3. CREC considers Applicant's discussion of the spent fuel storage pool components listed in Intervenor's interrogatories be highly deficient. CREC lacks at present the professional background necessary to describe specific mechanisms or processes by which this component would experience degradation. CREC maintains that it is Applicant's responsibility to research and present a well-formulated discussion of this topic.
4. CREC feels that Applicant has satisfactorily answered interrogatories 2-1 and 2-2 with regard to structural, mechanical, physical and other impacts.

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5. CREC is not sufficiently conversant with specific monitoring methods to identify defective fuel elements. CREC presumes future monitoring methods will not substantially differ from those now employed for the reactor. Due to the fact that the periods of time for storage are to be considerably longer than those for which industry experience has provided no evidence of "significant" degradation, CREC questions whether "general monitoring techniques will prove to be sufficient.

6. It is CREC's belief that Applicant should visually monitor failed fuel assemblies on a periodic, known schedule, and that regular "crosscheck" monitoring of all assemblies by independent, recognized experts be established as routine procedure.

7. CREC has no information on methods for encapsulating defective spent fuel assemblies, other than a reference to "a special container", provided on page 8 of the Answers to Interrogatory 2-6. CREC requests further information on these heretofore unmentioned "special containers", including purchasing and installation costs.

8. CREC has no information at this time from which to develop a clear correlation between crud and corrosion. Applicant's answer of 2-11 (a) seems, however, to support CREC's belief that crud does increase the corrosion rate. CREC requests figures to substantiate Applicant's answer that this increase is "negligible".

9. According to Dairyland Power documents presented in ACRS hearings of January, 1978, pieces of fuel rod were lost during transfer. Applicant has neither satisfactorily discussed the prospects for similar incidents in the future, nor discussed the ramifications of repeated incidents such as these. CREC requests further information of this topic.

10. CRSC has no prepared answer to this question at this time.

11. CRSC has no prepared answer to this question at this time.

12. CRSC maintains that the two-tier design complicates handling and monitoring problems, this increasing maintenance exposures which we find quite unacceptable. We find nothing peculiar or objectionable about the lower tier except for the fact that it will be buried by the second tier.

13. Any reduction in water over the assemblies, or total water to fuel displacement ratio would decrease the amount of water available during a LOCA accident, thus decreasing the margin of safety. CRSC opposes any two-tier design for LWT, but feels that if such a plan is to be implemented, the 200' level should be used.

14. CRSC obviously can provide no analysis to refute Applicant's analysis. However, CRSC does contend that a third party analysis is in order, and that any increase in exposure is unacceptable.

15. CRSC appeals to common sense in its assumption that the increase in spent fuel would increase the risk of accidental releases to employees and the public in the event of a cask drop accident. If Applicant has any information, calculations, or other data to support the contention that an increase in spent fuel would have no effect upon the risk or the magnitude of accidental releases to employees and the public, please provide it.

16. CRSC appeals to common sense in its assumption that failed fuel rods present a very dangerous storage problem and a shortened storage life. In the event of information provided by the NRC, CRSC also believes that storage of failed fuel rods will incur higher costs and

greater maintenance exposures. [REDACTED] further contends that greater maintenance exposures will result in greater environmental exposures.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
DAIRYLAND POWER COOPERATIVE
(La Crosse Boiling Water Reactor)

Docket No. 50-409
Amendment to
Provisional Operating
License No. DPR-45



AFFIDAVIT OF GEORGE R. NYGAARD

State of Wisconsin, County of La Crosse,

George R. Nygaard, being first duly sworn, on oath says as follows:

1. That he is duly authorized to answer the Interrogatories numbered 3,4,6,9,12, 13, 14, and 16, propounded by Dairyland Power Cooperative under date of September 29, 1978, on behalf of the Coulee Region Energy Coalition.

2. That the above-mentioned and attached answers are true and correct to the best of his knowledge and belief.

George F. Richard

Subscribed and sworn to before me on this 6th day of November,
1978.

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Signature of Notary Public

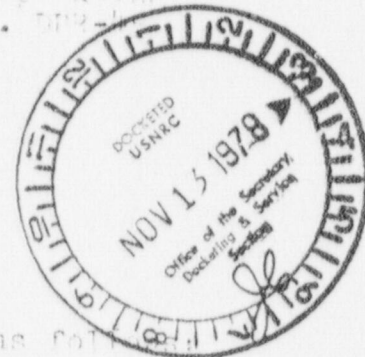
My Commission Expires Nov 2, 1980

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
DAIRYLAND POWER COOPERATIVE
(La Crosse Boiling Water Reactor)

Packet No. 50-409
Amendment to
Provisional Operating
License No. 50-409



AFFIDAVIT OF SANDRA MYRHUR

State of Wisconsin: County of La Crosse;

Sandra Myrhur, being first duly sworn, on oath says as follows:

1. That she is duly authorized to answer the Interrogatories numbered 2, 5, 7, 8, and 13, propounded by Dairyland Power Cooperative under date of September, 29, 1978, on behalf of the Coylee Region Energy Coalition.

2. That the above-mentioned and attached answers are true and correct to the best of her knowledge and belief.

Sandra Myrhur

Subscribed and sworn to before me on this 4th day of November, 1978.

Dale R. Stool
Signature of Notary Public

My Commission Expires Nov 2, 1980

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
DAIRYLAND POWER COOPERATIVE
(La Crosse Boiling Water Reactor)

Docket No. 60-409
Amendment to Provisional
Operating License (STP)

CERTIFICATE OF SERVICE

Service has on this day been effected by personal
delivery or first class mail on the following persons:

Charles Bechhoefer, Esq., Clem.
Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Mr. Ralph Decker
Route 4
Box 190D
Cambridge, Maryland 21613

Dr. George C. Anderson
Department of Oceanography
University of Washington
Seattle, Washington 98195

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

Colleen Woodhead, Esq.
Office of Executive Legal
Director
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

O.S. Hiestand, Esq.
Morran, Lewis and Bockius
1900 M Street, NW.
Washington, D.C. 20036

Dated: November 6, 1978

George P. Hyland
George P. Hyland

