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U.S. NUCLEAR REGULATORY COMMISSION..... ATOMIC SAFETY AND LICENSING BOARD

PHILA, ELEC. CO. Limerick Gen. Sta. No. 1

Docket No. 50-352 - OLA
(TS Iodine)

'88 APR 27 P1:41 LEP No. 87-550-03-LA

4/25/88

RESPONSE OF INTERVENOR ROBERT L. ANTHONY TO PECO RESPONSE, 3/31/88, AND NRC STAFF, 4/4/88

OFFICE OF PUBLIC SERVICE
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In response to the Board's order, 3/17/88, we answer PECO's response to the order and NRC Staff's, referring to PECO's response as PE and the Staff's as NRC, as follows:

1. We note that "iodine dose equivalent in the primary reactor coolant" is only used in PE (p.1.). Throughout the two responses the references are to iodine activity or iodine concentrations. We assume that PE, therefore, is aware that iodine spikes entail the presumption of dosages to employees and the public from any leakage in the primary coolant system. We agree with this presumption and call the Board's attention to our previous warning that PECO's stack release limits are based on erroneous distances on closest approaches of the public to the plant, at the railroad right-of-way, and the parking lot and entrance to the plant for visitors and others with business.
2. In general we think that PE and NRC have treated superficially the Board's request for clarification, only reworking the affidavits submitted previously.
3. We repeat our request that the Board weigh PECO's ability to operate safely the Limerick reactor or to comply fully with NRC Technical Specifications. We question PECO's ability to supervise its employees and to protect the public as revealed in NRC's investigation of the dangerous operation of the Peach Bottom plant, which NRC ordered closed. The same dangerous lack of supervision applies to Limerick as set forth in the warning letter to PECO from the Institute of Nuclear Power Operations, Zack T. Pate, Pres., to Robert D. Harrison, PECO Board, 1/11/88 (p.8 from Conclusions):

A corporate culture had been allowed to develop, from the top down, that down played, rejected, or ignored problems. Management was defensive from the top down. Problems frequently were not reported up the line organization, and those that were often were not dealt with effectively. The climate for this organizational behavior was set from the highest levels of the corporate management.
4. PECO's response gives no reassurance that it can operate Limerick in compliance with TS, including the observing and reporting of Iodine spikes with reference to indication of flaws in nuclear fuel and potential for accidental release of radioactivity to the public environment. The watering down of TS in the amendment adds further risk to the health and safety of the public.
5. NRC (p.2) adds more disquieting information on nuclear fuel and public safety: a temporary increase in coolant iodine concentration is frequently observed at reactors where leaking fuel rods are present.

We ask the Board to consider the operating problems which seem inevitable from (NRC

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p.2) where an iodine spike could be concluded to be the result of power changes , rather than a warning of "the sudden failure of one or more fuel rods" which could involve a critical situation in the reactor which would demand immediate action by the operators,perhaps emergency action.

6. NRC(p 3.) is also alarming from the point of view of public safety related to iodine activity. According to NRC,activity of 4 microcuries per gram requires plant shutdown,but does not specify how soon. In case the level should fall to .2 the plant could presumably continue operation without being reported to NRC until the 49th hour. Even then a potential,dangerous condition could exist in the reactor from accelerated fuel rod failures which could be discounted by operators as indicated by iodine spikes of .2 or less, merely reportable in "30 day and 92 day reports if the iodine activity exceeds 0.2 microcuries per gram for 48 hours or if this limit is exceeded for 500 hours in any consecutive 6 month period."

CONCLUSION. The responses of PECO and NRC appear to reinforce the dangers to safe operation of the Limerick plant from iodine activity in the reactor and the chances for errors in interpretation and operator reaction under the present TS. We urge the Board,therefore,to deny the applicant's motion for summary disposition and to deny the application for a license amendment.

Respectfully submitted,

cc: NRC Staff,Docketing,Board Panel,PECO

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