

7016

RELATED CORRESPONDENCE

DOCKETED
September 1, 1988

UNITED STATES NUCLEAR REGULATORY COMMISSION
88 SEP -6 P5:10
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)
Public Service Company of)
New Hampshire, et al.)
)
(Seabrook Station, Units 1 & 2))
_____)

Docket Nos. 50-443 OL
50-444 OL
OFFSITE EMERGENCY
PLANNING ISSUE

NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
SUPPLEMENTAL ANSWER TO APPLICANTS' FIRST SET OF INTERROGATORIES
AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
REGARDING NEW ENGLAND COALITION ON NUCLEAR POLLUTION'S
CONTENTIONS CONCERNING RG-58 CABLE

The New England Coalition on Nuclear Pollution hereby supplements its August 19, 1988 response to question 13 from Applicants' First Set of Interrogatories.

- 13) Do you assert that RG-59 cable is not technically qualified to perform the functions required by the 12 RG-58 cables that were replaced? If so, please state for each cable
- (a) the function(s) that cannot be performed;
 - (b) the conditions under which the function(s) cannot be performed;
 - (c) the safety-related nature of the function(s);
 - (d) the nature of the technical inadequacy;
 - (e) the effect of this technical inadequacy on functional performance;
 - (f) all the facts underlying this assertion and explain exactly how those facts support the assertion.

SUPPLEMENTED ANSWER: NECNP asserts that RG-59 cable is not technically qualified to perform the 12 RG-58 cable functions in an accident environment because Applicants have not specified performance criteria for each such application. Our reasons for this position are described in NECNP's Motion for Clarification or Reconsideration of the Board's Order of June 23, 1988, dated

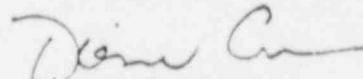
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July 13, 1988, and NECNP's Reply to NRC Staff Response to Board Request of July 20, 1988, and Affidavit of Newell K. Woodward, dated July 27, 1988. With respect to technical qualifications for performance under normal operating conditions, NECNP does not assert that RG-59 cable is not technically qualified to perform the functions required by the 12 RG-58 cables that were replaced.

This supplemental response is based on NECNP consultant Robert D. Pollard's review of Engineering Evaluation Number 88-014, "Replacement of Coax Cable Type RG-58 by RG-59," May 2, 1988, by Nirmal K. Bhowmik - NHY.

Respectfully submitted,



Diane Curran
HARMON & WEISS
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September 1, 1988

CERTIFICATE OF SERVICE

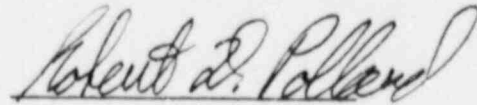
I certify that on September 1, 1988, copies of the foregoing pleading were served by first-class mail on all parties to this proceeding, as designated on the attached service list.



Diane Curran

AFFIRMATION OF ROBERT D. POLLARD

I, Robert D. Pollard, affirm that, to the best of my knowledge and belief, the factual information contained in the answer to the foregoing interrogatory is true and correct.

A handwritten signature in cursive script that reads "Robert D. Pollard". The signature is written in dark ink and is positioned above the printed name.

Robert D. Pollard

Dated: August 31, 1988

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