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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED  
USNRC

'84 June 12, 1984<sup>1</sup>

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
OF LICENSING & SERVICE  
BRANCH

Glenn O. Bright  
Dr. James H. Carpenter  
James L. Kelley, Chairman

In the Matter of

CAROLINA POWER AND LIGHT CO. et al.  
(Shearon Harris Nuclear Power Plant,  
Unit 1)

Docket 50-400 OL

ASLBP No. 82-468-01  
OL

Joint Intervenors' Response to Motions for Summary Disposition  
on Joint Contention 7  
(Steam Generators)

After consultation with our experts, Joint Intervenors have decided that we lack sufficient resources to document a response to the Applicants Motion (and Staff response which is effectively the same motion), This does not mean we believe the statements or conclusions of Applicants and Staff are necessarily true. For example, the omission of actual data from page B-58 (bottom line) of NUREG-1014 (Staff Exhibit D to "response") makes it impossible to analyze the conclusions of Applicants and Staff, other than to take their word for it, re flow-induced vibrations. The lack of such information is a clear handicap to us and our experts (cf. Staff affidavit at 3-5, paragraphs 8,10,12, 13) in refuting such claims. We stress that it is time and resource constraints that lead to our response being so limited as this is. We do not agree with the analysis put forward by Applicants, particularly not its strong language suggesting there cannot be problems in the areas identified.

For Joint Intervenors

*Wells Eddleman*  
Wells Eddleman

<sup>1</sup>Extension of time for filing approved by Judge Kelley & Applicants. D507

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JOINT CONTENTION 7

List of facts in dispute where  
Joint Intervenors have laid out  
the problem with the "fact"  
(i.e. missing data)

1. That Westinghouse et al's vibration analysis for Model D-4 steam generators is accurate in view of test result data.
2. That the conclusions alleged to be drawn from such tests of tube vibration are accurate.

Joint Intervenors respectfully point out that no other facts are listed because we don't have (and our experts lack) time to produce the documentation therefor, or resources which would give us or them more time. We do dispute the motion in many respects, especially in its overdrawn almost absolutist, conclusions.