

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	§	
	§	
HOUSTON LIGHTING AND POWER COMPANY	§	Docket No. 50-466
	§	
(Allens Creek Nuclear Generating	§	
Station, Unit 1)	§	

APPLICANT'S RESPONSE TO "JOHN F. DOHERTY'S
AMENDMENTS TO CONTENTIONS NUMBERED:
19, 33"

Houston Lighting & Power Company (Applicant)
hereby submits the following individual responses to the
amended contentions filed by John F. Doherty (Intervenor) on
August 10, 1979.

Amendment to Contention 19. Collet retainer tube cracking.

This latest amendment to contention 19 does nothing
to alter the conclusions reached in Applicant's Response to
John F. Doherty's Additional Contentions. Intervenor again
does not discuss why Applicant's changes to the materials,
design, and fabrication of collect retainer tubes to avoid
cracking problems is inadequate. This contention remains
entirely inadequate in satisfying the specificity requirements
of 10 CFR §2.714 and should be dismissed.

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Amendment to Contention 33. Doppler Reactivity Feedback.

In essence, Intervenor contends that General Electric has relied on inappropriate experimental results in confirming the Doppler reactivity coefficient. To support his statement, he includes an edited quote from NEDO-20964 dealing with the moderator void coefficient.^{1/} Obviously, Intervenor has confused Doppler reactivity coefficients with moderator void coefficients. Since the latter has nothing to do with the former, Intervenor has provided no information about the issue he is attempting to place in contention.

Thus, Mr. Doherty's amendments add nothing to his earlier contention and succeed only in demonstrating an apparent confusion with respects to the factual issues.

^{1/} After confusing Doppler and moderator void coefficients, Intervenor further erroneously asserts that the mathematical model for the moderator void coefficient relies on data produced from experiments using the SPERT-I and SPERT-III reactors. In fact, the moderator void coefficient mathematical model has never relied on SPERT results; furthermore, the Doppler reactivity model was compared to SPERT results but did not in anyway rely on those results.

Accordingly, the contention should be rejected for lack of any basis.

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Respectfully submitted,

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	§	
	§	
HOUSTON LIGHTING & POWER COMPANY	§	Docket No. 50466
	§	
(Allens Creek Nuclear Generating	§	
Station, Unit 1)	§	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to "John F. Doherty's Amendments to Contentions Numbered 19 & 33" in the above-captioned proceeding were sent on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 17th day of August, 1979.

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