

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
LOUISIANA POWER & LIGHT COMPANY) Docket No. 50-382
)
(Waterford Steam Electric Station,)
Unit 3))

APPLICANT'S RESPONSE TO JOINT
INTERVENORS' ADDITIONAL CONTENTIONS

On December 10, 1979, Joint Intervenor Save Our Wetlands, Inc. and Oystershell Alliance, Inc. filed additional TMI-related contentions numbered 24 through 29. Applicant has no present objection to these additional contentions but reserves the right at a later date to move to strike Contention 28 in whole or in part on either of the following grounds.

First, to the extent it may appear in the course of discovery or otherwise that subpart (a) of Contention 28 challenges the adequacy of NRC's acceptance criteria for emergency core cooling systems (as opposed to Applicant's compliance with such criteria) as contained in 10 CFR 50.46, Applicant will oppose subpart (a) as an attack on NRC regulations.

Second, to the extent it may appear in the course of discovery or otherwise that subpart (b) of Contention 28 challenges the adequacy of the Commission's criteria for post-accident hydrogen control (as opposed to Applicant's compliance with such criteria) as contained in 10 CFR 50.44, Applicant will oppose subpart

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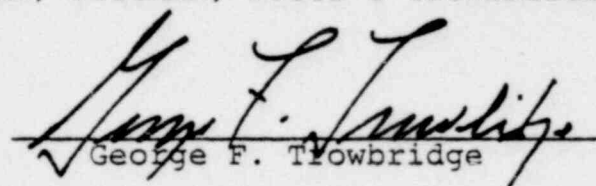
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(b) as an attack on NRC regulations. Applicant is aware that the Final Report of the Lessons Learned Task Force (pp. 3-6 and A-14, 15) recommends a new rulemaking proceeding which, among other things, would re-examine hydrogen control measures. If the Commission adopts this recommendation, Applicant believes that the rulemaking proceeding rather than this hearing should be the forum for resolution of this generic item.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By


George F. Trowbridge

Dated: December 26, 1979

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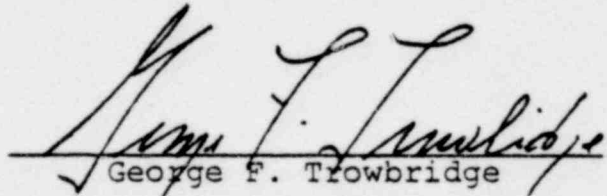
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Response to Joint Intervenor's Additional Contentions," dated December 26, 1979, were served upon those persons on the attached Service List by deposit in the United States Mail, postage prepaid, this 26th day of December, 1979.


George F. Trowbridge

Dated: December 26, 1979

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