

**Florida
Power**
CORPORATION

June 22, 1979

File: 3-0-3-a-3

Mr. J. P. O'Reilly
Director
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Suite 3100
101 Marietta Street
Atlanta, GA 30303

Subject: Docket No. 50-302
Operating License No. DPR-72
IE Bulletin 79-01A

Dear Mr. O'Reilly:

In response to the subject NRC Bulletin, we have reviewed the CR #3 design and have determined that no ASCO solenoid valves are used or planned for use in safety-related systems inside containment.

Should you have any questions concerning our response, please contact this office.

Very truly yours,

FLORIDA POWER CORPORATION

W. P. Stewart

W. P. Stewart
Manager
Nuclear Operations

ECSekcF04(D70)

cc: U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Division of Reactor Operation Inspection
Washington, DC 20555

NRC Office of Inspection & Enforcement
Division of Reactor Construction Inspection
Washington, DC 20555

NBC PUBLIC DOCUMENT ROOM
LAW OFFICES
CONNER, MOORE & CORBER
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WASHINGTON, D. C. 20006

June 30, 1979

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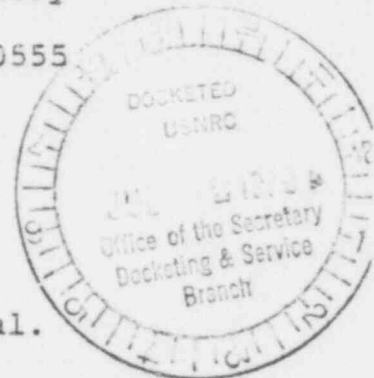
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Washington, D.C. 20555

Dr. James C. Lamb, III
Member, Atomic Safety and
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313 Woodhaven Road
Chapel Hill, N.C. 27514

In the Matter of
Public Service Electric and Gas Company, et al.
(Salem Nuclear Generating Station, Unit 1)
Docket No. 50-272



Gentlemen:

Enclosed are:

- (1) "Licensee's Objections to Lower Alloways Creek Township's Proffered Testimony," and
- (2) "Licensee's Outline of Cross-Examination."

These filings are being made one day late because of my participation in Cincinnati Gas & Electric Company's Zimmer licensing hearings in Cincinnati, Ohio which unexpectedly continued through Friday, June 29, 1979, and my absence from the office for substantially all of the month of June. This slight delay in submitting these two documents will not affect the upcoming hearing scheduled for the week of July 10.

Sincerely,

Mark J. Wetterhahn

Mark J. Wetterhahn
Counsel for Licensee

cc: Per Service List

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
PUBLIC SERVICE ELECTRIC & GAS)	Docket No. 50-272
COMPANY, et al.)	(Proposed Issuance of
)	Amendment to Facility
(Salem Nuclear Generating)	Operating License
Station, Unit 1))	No. DPR-70)

LICENSEE'S OBJECTIONS TO LOWER ALLOWAYS CREEK
TOWNSHIP'S PROFFERED TESTIMONY

On April 25, 1979, counsel for Lower Alloways Creek Township ("LACT") filed a document entitled "Response to the Atomic Safety and Licensing Board Order dated April 18, 1979," transmitting the "Testimony of Richard E. Webb, Ph.D. in Respect to Board Question #3 of Order Dated April 18, 1979." On June 12, 1979, LACT submitted the written testimony of Earl A. Gulbransen, Ph.D. which purported to relate to all three of the Board's questions. As discussed below, Licensee Public Service Electric & Gas Company, et al., objects to the proposed testimony of Drs. Webb and Gulbransen.

I. The Testimony of Dr. Gulbransen

Licensee objects to the proffered testimony of Dr. Gulbransen as beyond the scope of the Board's questions, as beyond the scope of the issues constituting an attack on the

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DUPLICATE DOCUMENT	
Entire document previously entered into system under:	
ANO	<u>7908030529</u>
No. of pages:	<u>7</u>

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
PUBLIC SERVICE ELECTRIC & GAS)	Docket No. 50-272
COMPANY, et al.)	(Proposed Issuance
)	of Amendment to
(Salem Nuclear Generating)	Facility Operating
Station, Unit 1))	License No. DPR-70)

LICENSEE'S OUTLINE OF CROSS-EXAMINATION

If and to the extent that "Licensee's Objections to Lower Alloways Creek Township's Proffered Testimony," dated June 30, 1979, are not sustained, the following represents Licensee's outline of intended cross-examination:

I. Testimony of Dr. Earl A. Gulbransen

1. Qualifications of the Witness to testify with regard to:
 - a. The design and operation of the Salem Generating Station
 - b. The design, construction and operation of the fuel pool and racks for Salem Unit 1
 - c. The cause and effects of hypothesized reactor accidents on the spent fuel pool
 - d. The TMI Event
 - e. NRC ECCS Acceptance Criteria
2. Bias and Prejudice
3. Basis for Testimony Regarding the Three Mile Island event
 - a. Course of the event
 - b. Basis for conclusions regarding cladding effects
 - c. Basis for recommended "procedures," including hydrogen embrittlement, hydrogen in the cooling water and necessity for hydrogen gauges.

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4. Knowledge of the NRC's ECCS Acceptance Criteria and Comparison with Testimony.^{1/}
5. Basis for testimony regarding cladding behavior in reactors, particularly Salem Generating Station, Unit 1.
6. Basis for conclusions regarding the safety of the spent fuel pool and the consequences of nuclear accidents.

II. Testimony of Dr. Richard Webb

1. Qualifications of the Witness to Testify Regarding:
 - a. Plans to store fuel in the spent fuel pool in the Salem Generating Station
 - b. Accident evaluation and probability
 - c. The design, construction and operation of Salem Generating Station, including the spent fuel pool
 - d. The "loss of water accident"
 - e. A permanent fuel repository at Salem
2. Bias and prejudice of the Witness
3. Basis for evaluation of a "Loss of Water Accident," including its hypothesized consequences.
4. Basis for evaluation of conceivable possibilities for causing a "Loss of Water Accident"
5. Basis for evaluation regarding criticality accidents
6. Basis for evaluation regarding reactor accidents that could cause "Loss of Water Accidents," including effect on and actions by the operating crew.

^{1/} Counsel for LACT should assure that a copy of the NRC's ECCS Acceptance Criteria are supplied to the Witness in advance of the hearing to facilitate cross-examination.

7. Basis for evaluation of consequences of reactor accidents and "Loss of Water Accidents"
8. Basis for statements regarding probabilistic risk assessment and need for future studies
9. Basis for statements regarding a permanent spent fuel repository at Salem
10. Basis for statements regarding impracticality of theoretical analysis and experiment verification

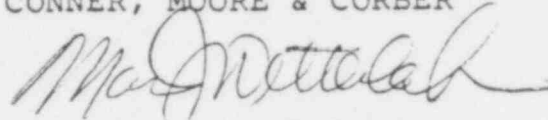
III. Testimony of the NRC Staff

1. Qualifications of the Witnesses to Testify
2. Basis for statements related to the effect of the TMI accident on the TMI spent fuel pool
3. Basis for statements regarding causes of the TMI incident and the chronology of events
4. Basis for statements regarding design and operational differences between TMI and Salem Unit 1
5. Basis for statements regarding hypothesized series of events at Salem Unit 1 in partial response to Board Question 3
6. Basis for statements regarding effect of hypothesized releases to the Auxiliary Building at Salem Unit 1 on the operation of the spent fuel pool
7. Basis for statements regarding effect of hypothesized releases into the Auxiliary Building on systems in the Fuel Handling Building at Salem Unit 1
8. Basis for conclusions regarding the Staff's evaluation resulting from the Board's questions on the proposed amendment to increase the spent fuel capacity

9. Basis for statements, evaluations and analysis contained
in NUREG-0560 as they apply to the Board's questions

Respectfully submitted,

CONNER, MOORE & CORBER

A handwritten signature in cursive script, appearing to read "Mark J. Wetterhahn".

Mark J. Wetterhahn
Counsel for the Licensee

June 30, 1979

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
PUBLIC SERVICE ELECTRIC AND GAS) Docket No. 50-272
COMPANY, et al.) (Proposed Issuance of
) Amendment to Facility
(Salem Nuclear Generating) Operating License
Station, Unit 1)) No. DPR-70)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Objections to Lower Alloways Creek Township's Proffered Testimony" and "Licensee's Outline of Cross-Examination," dated June 30, 1979, in the captioned matter, have been served upon the following by deposit in the United States mail this 30th day of June, 1979:

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