

NRC PUBLIC DOCUMENT ROOM

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



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

APPLICANT'S RESPONSE  
TO JOHN F. DOHERTY'S THIRD\* SET OF  
INTERROGATORIES TO HL&P

In response to the interrogatories propounded by John F. Doherty, Houston Lighting & Power (Applicant) answers as follows:

INTERROGATORY NO. 1: As designed, can two more charcoal filters be installed in the radwaste building of ACNGS?

ANSWER: Applicant objects to this interrogatory on the grounds that the question is nonsensical. There are no charcoal filters in the radwaste building, so that a reference to "two more" makes no sense. There is nothing in this interrogatory, or any other, to aid in identifying the relevant system or contention inquired about; therefore, Applicant cannot meaningfully respond.

INTERROGATORY NO. 2: If the answer to No. 1 (above) is "no" state the reasons such devices cannot be installed.

\*This document was incorrectly titled "JOHN DOHERTY'S SECOND SET OF INTERROGATORIES TO H.L.&P."

The "device" in this question is called a "charcoal delay bed" in Figure 11-2 of the Supplement No. 2 to the SER.

ANSWER: Applicant objects to this interrogatory on the grounds given in the answer to Interrogatory No. 1.

INTERROGATORY NO. 3: Has Applicant modified the off-gas system in the following way since the SER and Supplement No. 2 to the SER?

- a. Replacing the liquid loop seals in the off-gas process lines with traps which do not rely on a head of water to provide the seals?
- b. The addition of a "guard bed"?
- c. The addition of any additional "charcoal delay beds"?

ANSWER: a. The applicant has never had loop seals in the off-gas process lines.

b. There has been no addition of a "guard bed" to the off-gas system.

c. There have been no additional "charcoal delay beds" added to the off-gas system.

INTERROGATORY NO. 4: Please state where in the ACNGS the location of the bottled nitrogen to be used on an automatic depressurization system air supply (mentioned on

Page 5-9, first full paragraph) will be.

ANSWER: The ADS nitrogen gas bottles are located on  
elevation 142.50' of the Reactor Auxiliary Building.

Respectfully submitted,

C. Thomas Biddle Jr

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ATTORNEYS FOR APPLICANT  
HOUSTON LIGHTING & POWER COMPANY

STATE OF TEXAS

§

COUNTY OF HARRIS

§

BEFORE ME, THE UNDERSIGNED AUTHORITY, on this day personally appeared, who upon his oath stated that he answered the foregoing Houston Lighting & Power Company's Response to John F. Doherty's Third Set of Interrogatories to Houston Lighting & Power Company in his capacity as Supervising Engineer for Houston Lighting & Power Company, and all statements contained therein are true and correct to the best of his knowledge and belief.

Jon G. White  
Jon G. White

SUBSCRIBED AND SWORN TO BEFORE ME by the said Jon G. White, on this 25<sup>th</sup> day of June, 1979.

Susan Powers  
Notary Public in and for  
Harris County, Texas

SUSAN POWERS  
Notary Public in Harris County, Texas  
My Commission Expires May 20, 1981

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Station, Unit 1)	\$	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to John F. Doherty's Third Set of Interrogatories to HL&P in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 25<sup>th</sup> day of June, 1979.

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