

COMANCHE PEAK STEAM ELECTRIC STATION (CPSES)

Citizens for Fair Utility Regulation (CFUR) Contentions

Contention I

Applicants have not demonstrated technical qualifications to operate CPSES in accordance with 10 CFR 50.59(a)(4) in that they have relied upon Westinghouse to prepare a portion of the Final Safety Analysis Report (FSAR).

Position*

TU (Applicants)	S (Staff)	I (Intervenor)
A (W)	A	A

Contention II.A

One or more of the reports used in the construction of computer codes for the CPSES/FSAR have not been verified and formally accepted; thus conclusions based upon these computer codes are invalid.

Position

TU	S	I
A (W)	A (W)	A

POOR ORIGINAL

Contention II.B

Deferred

Contention III.A

Some accident sequences heretofore considered to have probabilities so low as to be considered incredible based upon the findings of WASH-1400, are in

* Key:

A = Admissible as to wording and substance
A (W) = Admissible as to wording only

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fact more probable in light of the findings of the Lewis Committee and should be evaluated as credible accidents for CPSES. In order to insure conservatism, the probabilities associated with such accident sequences should be the highest probabilities within the specified confidence band.

Position

TU	S	I
A (W)	A (W)	A

Contention III.B

Deferred.

Contention IV

The Applicants have failed to establish and execute a quality assurance/quality control program which adheres to the criteria in 10 CFR 50, Appendix B. Applicants have failed to demonstrate sufficient managerial and administrative controls to assure safe operation as required in 10 CFR Part 50, Appendix B. Therefore, special operating conditions should be required.

Position

TU	S	I
A	A	A

POOR ORIGINAL

Contention V

There is no assurance that the Spent Fuel Pool area can withstand the effects of tornadoes, as required by 10 CFR Part 50, Appendix A, Criterion 2 because:

- a. The analyses upon which the Design Basis Tornado (DBT) is based are perfunctory, outdated and unreliable;
- b. The loading analyses based on the Design Basis Tornado (DBT) are inappropriate because they fail to consider

the potential loading combination of the DBT and a tornado-generated missile.

- c. The assignment of a loading factor of 1.0 for load combination equations incorporating tornado loadings in combination with "normal and accident conditions" is unacceptable.
- d. The DBT parameters used in FSAR Section 3.3.2.1 are less conservative than the parameters found in NRC Regulatory Guide 1.76 c.2.

Position

TU	S	I
A (W)	A	A

POOR ORIGINAL

Contention VI

Applicants have failed to adequately evaluate whether the rock "overbreak" and subsequent fissure repair using concrete grout have impaired the ability of Category I structures to withstand seismic disturbances.

Position

TU	S	I
A (W)	A (W)	A

Contention VII

Withdrawn.

Contention VIII (former IV.D.)

Applicants have failed to adequately evaluate the impacts of the drawdown of the groundwater under CPSES during and as a result of plant operation.

Position

TU	S	I
A (W)	A (W)	A

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