

Citizens Association for Sound Energy (CASE) Contentions

Contention 1

Applicants have failed to demonstrate sufficient managerial and administrative controls to assure safe operation as required by 10 CFR Part 50, Appendix B.

Position*

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

Contention 2

Withdrawn.

POOR ORIGINAL

Contentions 3&4

Applicants have failed to demonstrate a need for the power to be generated by CPSES because:

- a. The reserve margins presented in the Environmental Report (ER) reflect adequate reserve margins through 1985 without CPSES.
- b. The figures for the Applicants' capabilities, demands and reserves, set forth in the ER are inaccurate, incomplete and out of date.

Position

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

Contention 5

The ER fails to adequately discuss and consider new information concerning alternatives to the operation of CPSES available to Applicants (specifically,

*Key:

- A = Agreement as to wording and substance
A(W) = Agreement as to wording only
N = No agreement as to wording or substance

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gas, coal, lignite and coal gasification).

Position

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

Contention 6

A cost-benefit balance favorable to operation of CPSES cannot be struck because of the following costs, which have not been adequately considered:

- a. Decommissioning;
- b. The costs to insure that the reactor vessel for Unit #2 will fit correctly;
- c. Fuel over the life of the plant;
- d. Long-term waste storage and/or disposal.

Position

TU	S	I
A (W)	A	A

POOR ORIGINAL

Contention 7

Neither the Applicants nor the Staff has adequately considered the health or economic costs of a possible accident involving spent fuel stored on-site, as discussed in Report No. 290 (NRC Translation #161, "Studies Comparing the Greatest Possible Failure Sequences In a Processing Installation and In A Nuclear Power Plant"), SAND-77-1371, "Spent Fuel Heatup Following Loss of Water During Storage," the studies and testimony of Richard E. Webb, and the effects of a reactor accident on that spent fuel.

Position

TU	S	I
A (W)	A	A

Contention 8

The Applicants fail to analyze the probability of and health and economic costs of a Class 9 accident.

Position

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

Contentions 9&17

Neither the Applicants nor the Staff has adequately considered the health effects of low-level radiation on the population surrounding CPSES.

Position

TU	S	I
A (W)	A	A

POOR ORIGINAL

Contention 10

Neither the Applicant nor the Staff has adequately considered the potential economic effects on operation of CPSES because of accidents which may occur in reactors of similar design to CPSES.

Position

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

Contention 11

The cost-benefit analysis is inaccurate in that Applicants' projection of a 30-40 yr. useful life for CPSES is unrealistic because of:

- effects of cumulative radiation on the plant, and
- economic incentives to discontinue plant operation at some shorter time.

Position

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

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Contention 12 (incorporates contentions 12, 13, 14 and 15)

Applicants have failed to comply with 10 CFR Part 50, Appendix E, regarding emergency planning, for the following reasons:

- a. The FSAR does not identify state or regional authorities responsible for emergency planning or who have special qualifications for dealing with emergencies.
- b. No agreements have been reached with local and state officials and agencies for the early warning and evacuation of the public, including the identification of the principal officials by titles and agencies.
- c. There is no description of the arrangements for services of physicians and other medical personnel qualified to handle radiation emergencies and arrangements for the transportation of injured or contaminated individuals beyond the site boundary.
- d. There are no adequate plans for testing by periodic drills of emergency plans and provisions for participation in the drills by persons whose assistance may be needed, other than employees of the Applicant.
- e. There is no provision for medical facilities in the immediate vicinity of the site, which includes Glen Rose.
- f. There is no provision for emergency planning for Glen Rose or the Dallas/Ft. Worth metroplex.

Position

TU
A (W)

S
A

I
A

POOR ORIGINAL

Contention 16

The requirements of the Atomic Energy Act, as amended, have not been met in that the Applicants are not financially qualified to operate the proposed facility.

Position

TU

S

I

N

A

A

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Contention 18 (incorporated into 6)

Contention 19

The Applicants' failure to adhere to the quality assurance/quality control provisions required by the construction permits for Comanche Peak, Units 1&2, and the requirements of Appendix B of 10 CFR 50, and the construction practices employed, specifically in regard to concrete work, welding, inspection, materials used and craft labor qualifications, have raised substantial questions as to compliance with 10 CFR §50.57(a)(1).

Position

TU	S	I
A	A	A

POOR ORIGINAL

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