

ACORN Contentions

SAFETY CONTENTIONS

One

Original is set forth below:

The CPSES* design fails to adequately account for the effect of asymmetric loading resulting from a pipe break in the area between the reactor vessel and the shield wall.

Position**

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

Two

Original is set forth below:

NRC Staff review is inadequate to identify and correct modes of interaction between reactor systems in the CPSES design which can adversely affect the redundancy or independence of safety systems.

Position

TU	S	I
A (W)	N	A

POOR ORIGINAL

Three

Neither the Applicants nor the Staff has a reliable method for evaluating or ensuring that Class IE safety-related equipment is designed to accommodate the effects of and to be compatible with the conditions associated with the

*"CPSES" has been substituted for "Comanche Peak" in all of the contentions.

**

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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most severe postulated accident; thus, General Design Criterion 4 has not been satisfied.

Position

TU	S	I
A (W)	A	A

Four

Neither the Applicants nor the Staff has reliable methods for evaluating and ensuring that structures, systems and components important to safety are designed to withstand the effects of the safe shutdown earthquake without losing the capability to perform their safety functions; thus, General Design Criterion 2 has not been satisfied.

Position

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

POOR ORIGINAL

Five

The electrical cables for all redundant safety systems have not been designed and located to minimize the probability and effect of fires and explosions; thus, General Design Criterion 3 has not been satisfied.

Position

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

Six

Original is set forth below:

The D.C. Power System for the CPSES plant fails to meet the single failure criterion as defined in 10 CFR Part 50 Appendix A.

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Position

TU	S	I
N	N	A

Seven

One change - comma inserted after the word "adequate" on the first line.

The CPSES design does not provide adequate, reliable instrumentation to monitor variables and systems affecting the integrity of the reactor core, the pressure boundary or the containment after an accident, in violation of General Design Criterion 13 of Appendix A of 10 CFR Part 50.

Position

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

POOR ORIGINAL

Eight

Original is set forth below:

The CPSES design does not adequately account for failure of passive components in fluid systems important to safety.

Position

TU	S	I
N	N	A

Nine

Original is set forth below:

The CPSES design does not provide adequate equipment outside of the control room to promptly put the reactor in hot shutdown and so maintain it until attaining cold shutdown, also

from outside the control room, as required by General Design Criterion 19 of Appendix A to 10 CFR Part 50.

Position

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

Ten

Neither the Applicants nor the Staff has adequately considered the effects of aging and cumulative radiation on safety-related equipment which must be seismically and environmentally qualified, thus, General Design Criterion 4 has not been satisfied.

Position

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

POOR ORIGINAL

Eleven

Original is set forth below:

The CPSES design fails to address the possibility of a Class 9 Accident.

Position

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

Twelve

Withdrawn.

Thirteen

Applicants lack the ability to detect and adequately size flaws within 1) the reactor vessel and 2) pipes within the containment.

Position

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

Fourteen

One change - a slash has been inserted after the word "pressure" on the third line:

Applicants' FSAR fails to present a means for dealing with pressure transients produced by component failure, personnel error, or spurious valve actuation which exceed the pressure/temperature limits of the reactor vessel.

Position

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

POOR ORIGINAL

Fifteen

Withdrawn.

Sixteen, Seventeen, Eighteen, and Nineteen

Incorporated in Board's QA/QC contention.

Position

TU	S	I
N	N	A

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Twenty

The CPSES design fails to protect against corrosion within the steam generators which causes cracking of pipes and leakage of radioactive water.

Position

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

Twenty-One

The CPSES design is inadequate to prevent a water hammer problem which could affect a number of critical safety components.

Position

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

Twenty-Two

Withdrawn.

POOR ORIGINAL

Twenty-Three

Original is set forth below:

The CPSES design does not adequately address the possibility of a steam line break inside containment, nor does it insure the ability of equipment within containment to survive such an event so as to assure safe shutdown of the plant.

Position

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

992 133

Twenty-Four

The CPSES design does not adequately insure the reliable operation of on-site emergency power.

Position

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

Twenty-Five

The words "due to" (on the last line) have been deleted and the word "and" has been inserted in lieu thereof.

The CPSES design has not adequately resolved a generic safety problem for pressurized water reactors wherein the steam generator and reactor coolant pump support materials are subject to lamellar tearing and low fracture toughness.

Position

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

POOR ORIGINAL

Twenty-Six

The CPSES design does not adequately insure that safety-related water supplies will be available for plant operation in the event of ice build-up at the service water intake structure.

Position

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

Twenty-Seven

The CPSES design has not given due consideration to the need to withstand an act of sabotage.

Position

TU	S	I
N	A (W)	A

Twenty-Eight

The CPSES design fails to protect against accidents involving the movement and handling of heavy loads in the vicinity of spent fuel at the facility.

Position

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

Twenty-Nine

Incorporated in Board's QA/QC contention.

Position

TU	S	I
N	N	A

POOR ORIGINAL

Thirty

The CPSES design does not adequately protect against potential damage from turbine missiles to systems essential to the cooling and safe shutdown of the plant.

Position

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

992 135

Thirty-One

Applicants have failed to comply with 10 CFR Part 50, Appendix E, regarding emergency planning, because there is no provision for emergency planning for Glen Rose or the Dallas/Ft. Worth metroplex.

Position

TU	S	I
A (W)	A	A

Thirty-Two

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)	Defers	A

Thirty-Three

Original is set forth below:

The CPSES design does not adequately protect human safety and insure that radioiodine releases are as "low as reasonably achievable".

Position

TU	S	I
A (W)	Defers	A

POOR ORIGINAL

992 136

ENVIRONMENTAL CONTENTIONS

One

The energy to be generated by CPSES is unneeded, unsalable and uneconomically priced in view of the order of the Texas Public Utility Commission in Docket No. 14, and thus a favorable cost-benefit balance cannot be struck.

Position

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

Two

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

- a. The reserve margins presented in the ER reflect adequate 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

POOR ORIGINAL

Three

Withdrawn.

Four

The Applicants have not considered the costs of replacement of major pieces of equipment and their disposal in their cost-benefit balance.

Position

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

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Five

Applicants have not considered the environmental effects of storage and ultimate disposal of nuclear waste in their cost-benefit balance.

Position

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

Six

The Applicants have failed to postulate the possibilities, the effect on the environment, and the cost of "cleanups" which necessarily follow a nuclear accident such that a favorable cost-benefit balance cannot be struck.

Position

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

Seven

The Applicants have not considered the costs of safely decommissioning the facility after its useful life in the cost-benefit balance.

Position

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

POOR ORIGINAL