

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

APPLICANT'S RESPONSE TO
JOHN F. DOHERTY'S MOTION TO COMPEL DISCOVERY

Mr. Doherty requests production of NEDO-20566, which is a document entitled "General Electric Company Analytical Model for Loss of Coolant Analysis in Accordance with 10 C.F.R. 50 Appendix K, Amendment No. 3, Effect of Steam Environment on BWR Core Spray Distribution" and deals solely with core spray distribution phenomena. Intervenor's claim of need for the document stems solely from the assertion that "knowing the orientation of core spray will acquaint

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intervenor of local effects and differences in the core under LPCI operating conditions." The LPCI system, however, is in no way associated with the core spray provided by the High Pressure and Low Pressure Core Spray Systems and is not discussed in NEDO-20566. The LPCI system, a subsystem of the RHR system, merely pumps water directly into the core through piping entering the Reactor Vessel through nozzles (not spargers) completely separate in configuration and function from the core spray systems. [Compare PSAR Sections 6.3.2.2.3 and 6.3.2.2.4.] Applicant submits that there is no connection between core spray and LPCI and Mr. Doherty has made absolutely no showing of any relationship. Accordingly, this document is not related to any admitted contention and Mr. Doherty's motion should be denied as to NEDO-20566.

Applicant also objected to supplying NEDO-10329 on the grounds that it is not related to any admitted contention. Intervenor claims that this document, entitled "Loss-of-Coolant Accident and Emergency Core Cooling Models for General Electric Boiling Water Reactors", is needed because "LPCI is part of the ECCS, hence the LPCI is part of an ECCS model, and the contention does deal with LOCA. . ." However, Intervenor's contention deals with the reactivity inserted by cold water injected by the LPCI system. The model described by NEDO-10329 is a thermal-hydraulic model and does not account for reactivity effects at all. Hence, there is no relationship between the admitted LPCI Contention and this

NEDO. Consequently, Mr. Doherty's motion should be denied as to NEDO-10329.

Applicant has reconsidered its position on the request for "Supplement No. 1 to the Technical Report on Densification of General Electric Reactor Fuel" and will make the document available.

Respectfully submitted,

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Applicant's Response to John F. Doherty's Motion to Compel Discovery in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand-delivery this 14th day of September, 1979.

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