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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)	
)	
PUBLIC SERVICE ELECTRIC & GAS)	Docket No. 50-272
COMPANY, et al.)	(Proposed Issuance
)	of Amendment to
(Salem Nuclear Generating)	Facility Operating
Station, Unit 1))	License No. DPR-70)

LICENSEE'S OUTLINE OF CROSS-EXAMINATION

If and to the extent that "Licensee's Objections to Lower Alloways Creek Township's Proffered Testimony," dated June 30, 1979, are not sustained, the following represents Licensee's outline of intended cross-examination:

I. Testimony of Dr. Earl A. Gulbransen

1. Qualifications of the Witness to testify with regard to:
 - a. The design and operation of the Salem Generating Station
 - b. The design, construction and operation of the fuel pool and racks for Salem Unit 1
 - c. The cause and effects of hypothesized reactor accidents on the spent fuel pool
 - d. The TMI Event
 - e. NRC ECCS Acceptance Criteria
2. Bias and Prejudice
3. Basis for Testimony Regarding the Three Mile Island event
 - a. Course of the event
 - b. Basis for conclusions regarding cladding effects
 - c. Basis for recommended "procedures," including hydrogen embrittlement, hydrogen in the cooling water and necessity for hydrogen gauges.

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4. Knowledge of the NRC's ECCS Acceptance Criteria and Comparison with Testimony.^{1/}
5. Basis for testimony regarding cladding behavior in reactors, particularly Salem Generating Station, Unit 1.
6. Basis for conclusions regarding the safety of the spent fuel pool and the consequences of nuclear accidents.

II. Testimony of Dr. Richard Webb

1. Qualifications of the Witness to Testify Regarding:
 - a. Plans to store fuel in the spent fuel pool in the Salem Generating Station
 - b. Accident evaluation and probability
 - c. The design, construction and operation of Salem Generating Station, including the spent fuel pool
 - d. The "loss of water accident"
 - e. A permanent fuel repository at Salem
2. Bias and prejudice of the Witness
3. Basis for evaluation of a "Loss of Water Accident," including its hypothesized consequences.
4. Basis for evaluation of conceivable possibilities for causing a "Loss of Water Accident"
5. Basis for evaluation regarding criticality accidents
6. Basis for evaluation regarding reactor accidents that could cause "Loss of Water Accidents," including effect on and actions by the operating crew.

^{1/} Counsel for LACT should assure that a copy of the NRC's ECCS Acceptance Criteria are supplied to the Witness in advance of the hearing to facilitate cross-examination.

7. Basis for evaluation of consequences of reactor accidents and "Loss of Water Accidents"
8. Basis for statements regarding probabilistic risk assessment and need for future studies
9. Basis for statements regarding a permanent spent fuel repository at Salem
10. Basis for statements regarding impracticality of theoretical analysis and experiment verification

III. Testimony of the NRC Staff

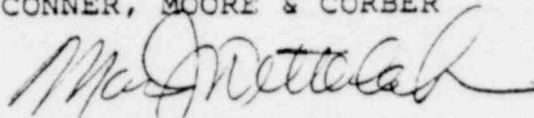
1. Qualifications of the Witnesses to Testify
2. Basis for statements related to the effect of the TMI accident on the TMI spent fuel pool
3. Basis for statements regarding causes of the TMI incident and the chronology of events
4. Basis for statements regarding design and operational differences between TMI and Salem Unit 1
5. Basis for statements regarding hypothesized series of events at Salem Unit 1 in partial response to Board Question 3
6. Basis for statements regarding effect of hypothesized releases to the Auxiliary Building at Salem Unit 1 on the operation of the spent fuel pool
7. Basis for statements regarding effect of hypothesized releases into the Auxiliary Building on systems in the Fuel Handling Building at Salem Unit 1
8. Basis for conclusions regarding the Staff's evaluation resulting from the Board's questions on the proposed amendment to increase the spent fuel capacity

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9. Basis for statements, evaluations and analysis contained
in NUREG-0560 as they apply to the Board's questions

Respectfully submitted,

CONNER, MOORE & CORBER

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn", written in a cursive style.

Mark J. Wetterhahn
Counsel for the Licensee

June 30, 1979

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
PUBLIC SERVICE ELECTRIC AND GAS)	Docket No. 50-272
COMPANY, et al.)	(Proposed Issuance of
)	Amendment to Facility
(Salem Nuclear Generating)	Operating License
Station, Unit 1))	No. DPR-70)

CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Objections to Lower Alloways Creek Township's Proffered Testimony" and "Licensee's Outline of Cross-Examination," dated June 30, 1979, in the captioned matter, have been served upon the following by deposit in the United States mail this 30th day of June, 1979:

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