

WED-7/20/81

UNITED STATES OF AMERICA  
BEFORE THE NUCLEAR REGULATORY COMMISSION

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POINT BEACH NUCLEAR PLANT UNITS 1 & 2  
DOCKET NOS. 50-266 and 50-301  
(Steam Generator Tube Slewing Program)

PETITION OF WISCONSIN'S ENVIRONMENTAL DECADE FOR  
ADMISSION AS PARTY, HEARING AND ENVIRONMENTAL IMPACT STATEMENT

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Petitioner WISCONSIN'S ENVIRONMENTAL DECADE, INC. ("Decade"), by its Director of Legal Affairs, Kathleen M. Falk, and pursuant to the Administrative Procedure Act, the Atomic Energy Act and 10 C.F.R. chs. 2, 50 and 51, hereby petitions as follows the United States Nuclear Regulatory Commission ("Commission") in the above-captioned proceeding in which the licensee Wisconsin Electric Power Company ("Company") has applied by letter-filing dated July 2, 1981, for a license amendment in the form of a change in its technical specifications to permit a new repair technique for degraded steam generator tubes at the Point Beach Nuclear Plant ("Point Beach"):

The Petitioner

The Petitioner is a non-profit, non-stock membership corporation organized under ch. 181 of the Wisconsin Statutes with offices at 302 East Washington Avenue in Madison, Wisconsin 53703, whose purposes include protection and enhancement of the human and natural environment. The Petitioner has more than 31,000 members throughout the State of Wisconsin, including members who reside in the vicinity of Point Beach, and in the

service territory of the Licensee.

#### The Challenged Action

The Licensee has requested by letter-filing dated July 2, 1981, permission to amend its license by modifying its technical specifications such as to permit an experimental and unproven repair program in lieu of removal from service by plugging for degraded steam generator tubes at Point Beach, a program commonly known as "sleeving".

#### The Petitioner's Interest

The Petitioner has members who reside in the immediate vicinity of Point Beach. As such, their health, safety and economic well-being is adversely affected by anything that may increase the risk of an accident at or increase the possibility of additional releases of radiation from the plant. Degraded steam generator tubes, according to several independent scientific studies, could induce essentially uncoolable conditions in the course of a loss of coolant accident. The proposed sleeving program may inadvertently increase the degradation of the steam generator tubes at the plant or impair the ability to detect incipient failures, increasing the risk of accident and/or radiation release and, thereby, injuring Petitioner's members and their progeny. The Petitioner also has members who are customers of the Licensee who may have their cost of service increase disproportionately to the available quantity thereof if the program costs substantially more than projected or is unsuccessful in implementation.

#### Contentions

The Petitioner contends with regard to the proposed license

amendment as follows:

(1) Degradation of as few as one to ten steam generator tubes in a pressurized water reactor such as Point Beach could induce essentially uncoolable conditions in the course of loss of coolant accident, according to several independent scientific studies.

(2) Rupture of steam generator tubes in normal operation will release radiation to the environment from the secondary system, and, if the rupture is sufficiently severe, in amounts in excess of maximum permissible doses.

(3) During sleeving, the braze or weld between the upper rim of the sleeve and the inner surface of the original tube will weaken the integrity of the tube even in laboratory conditions, and, in the field, may fatally compromise its integrity. This may lead to a circumferential rupture of the tube under various operating and/or accident conditions.

(4) The annulus between the original tube and the sleeve may give rise to an unexpectedly corrosive environment where the tube is or may be suffering in the future from a through wall crack and secondary water impurities seep into the narrow space.

(5) The presense of the sleeve will make the interpretation of eddy current test results extremely difficult and increase the probability that tubes with incipient failures may go undetected and rupture during a loss of coolant accident.

(6) The insertion of a sleeve with a nominal outer diameter of 3/4 inch tube inside the original 7/8 inch tube will reduce the flow of primary core cooling water and the cooling capacity of the core under various accident scenarios to an extent not bounded in previous safety analyses.

(7) The large number of workers required to perform a full scale sleeving program in the highly radioactive environment of the primary side of the steam generator will exceed the ability of the licensee or vendor to provide from their stable work forces. This will necessitate the employment of untrained and transient "jumpers" to perform the bulk of the work which quality may deteriorate as a consequence.

(8) The interests of the Petitioner are not adequately protected by any other party to this proceeding.

(9) The present technical specifications in the license require that tubes degraded beyond the plugging limit be removed from service by plugging and do not permit the proposed sleeving repair program.

(10) The best evidence strongly suggests that the actual cost of the proposed sleeving program will exceed projected costs by more than a magnitude of four.

#### The Petitioner's Position

It is the position of the Petitioner that the requested approval of a sleeving program at Point Beach is:

(1) A significant hazard within the meaning of 42 U.S.C. §2239(a) and 10 C.F.R. §§2.105(a)(3) and 50.91;

(2) An amendment of the license within the meaning of 42 U.S.C. §2239(a) and 10 C.F.R. §50.90.

(2) An alteration of the licensee's construction permit within the meaning of 10 C.F.R. §50.54 (n);

(3) A matter directly affecting the public interest within the meaning of 10 C.F.R. §2.104(a);

(4) A major and environmentally significant action within the meaning of 42 U.S.C. §4321.

Relief Requested

For the foregoing reasons, the Petitioner respectfully requests the Commission to:

(1) Conduct an adjudicatory hearing on the proposed license amendment, pursuant to 5 U.S.C. §§554 to 557, 42 U.S.C. 2239(a), 10 C.F.R. §§2.104, 2.105, 2.106 and 2.714, and Sholly v. N.R.C. (D.C. Cir. 1980), 15 E.R.C. 1231.

(2) Admit the Petitioner as a party in the above-referenced proceeding on the proposed license amendment and to the adjudicatory hearing on the proposed license amendment, pursuant to 42 U.S.C. §2239(a), 10 C.F.R. §§2.104, 2.105 and 2.714, and Sholly, supra.

(3) Prepare an environmental impact statement on the proposed license amendment, pursuant to 42 U.S.C. §4341 and 10 C.F.R. 2.06.

DATED this 20<sup>th</sup> day of July, 1981, at Madison, Wisconsin.

WISCONSIN'S ENVIRONMENTAL DECADE, INC.

By: Kathleen M. Falk  
KATHLEEN M. FALK  
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SERVICE

Service of the foregoing Petition shall be made by counsel upon:

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Ms. Ellyn Weiss  
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