

September 10, 1981

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN the Matter of

TEXAS UTILITIES GENERATING
COMPANY, ET AL.

Comanche Peak Steam Electric
Station, Units 1 and 2

Docket Nos. 50-445
50-446

CFUR'S RESPONSE TO NRC STAFF'S THIRD
SET OF INTERROGATORIES AND REQUEST
FOR DOCUMENTS



CFUR files this its answers to NRC Staff's Third Set of Interrogatories and Request for Documents.

ANSWERS TO INTERROGATORIES ON CONTENTION 9

- 9-18. CFUR contends that the staff's DES (parts 5.81 and 5.82) fails to adequately resolve the issues raised by CFUR in Contention 9.
- 9-19. Section 5.8.1 of the DES allegedly establishes that the combination of continuous (unplanned) and periodic (planned) releases will not exceed the requirements set forth in Part 20 and/or Part 50 of 10 CFR. However, there's no discussion and no attempt to indicate how the Applicant will comply with 10 CFR 20.1 (c) which states (paraphrased):

In accordance with the requirements of the Federal Radiation Council the Applicant should, in addition to complying with the requirements set forth in this part, make every reasonable effort to maintain radiation exposures as low as is reasonably achievable.

In addition, section 5.8.2 of the DES allegedly establishes a relationship between health impacts of unplanned releases and probabilities. It is reasonable to assume that periodic releases of accumulated radioactivity (not released during accident) will occur in a planned manner following many accidents. There is still no discussion of nor any indication of how Applicant will comply with 10 CFR Part 20.1 (c) as previously described.

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The applicant has some control in the release of gaseous radioactive effluents in that they can choose the most favorable meteorological conditions to make these releases

in order to minimize the total person-rem exposure which would result as a consequence of the release.

As stated in 10CFR Part 50 Appendix I, the total person-rem exposure must rely on calculational procedures based upon models and data, such that the actual exposure of an individual through appropriate pathways is unlikely to be substantially underestimated. Account shall be taken of the cumulative effect of all sources in the pathway. Furthermore, the interim measure of \$1000 per total man-rem and \$1000 per man-thyroid-rem implies that the linear hypothesis is to be used for the purpose of making these calculations.

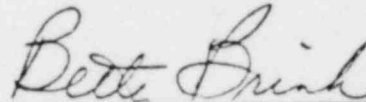
9-20. Other than attorneys-in-fact, CFUR has relied on no other persons.

9-21. These questions are duplicates of Staff interrogatories G-1, G-2 and G-3. CFUR's original answer, "Unknown at this time" remains the same. CFUR is under obligation to answer these interrogatories and will do so when the information the Staff is seeking can be supplied. Supplements will be in response to G-1, G-2 and G-3, not 9-21.

9-22. These questions are duplicates of Staff interrogatories G-4, G-5, and G-6. CFUR's original answer, "Unknown at this time," remains the same. CFUR is under obligation to answer these interrogatories and will do so when the information the Staff is seeking can be supplied. Supplements will be in response to G-4, G-5 and G-6, not 9-22.

CERTIFICATE

I declare (or certify, verify or state) under penalty of perjury that the preceding answers to NRC Staffs' interrogatories are true and correct to the best of my knowledge on this 10th day of September, 1981



Betty Brink
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing documents have been forwarded to all parties of record this 12th day of September, 1981, by deposit in the United States mail.

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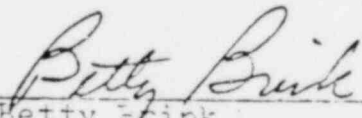
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