

10/26/78

50-266

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the Matter of Wisconsin Electric Power Company amendment to License Nos. DPR-24 & 27. ) Docket Nos. 50-266  
50-301

LAKESHORE CITIZENS FOR SAFE ENERGY RESPONSES TO THE WISCONSIN  
ELECTRIC POWER COMPANY'S FIRST SET OF INTERROGATORIES

CONTENTIONS:

- 3b-1 Intervenors believe that worker activity will increase in these three tasks; First, the removal of the old racks and the re-filling of new racks will require increased "over the pool" and "in the pool" activity. Secondly, we understand that some of the spent fuel assemblies may be moved about in the pool - from one storage location to another - after removal from the core to assure that the outermost storage positions (those nearest the walls) will be the coolest. Thirdly, we believe the increased number of stored assemblies will require more monitoring activity by the workers. (D. Estes)
- 3b-2 Intervenors believe the SFP coolant water suction pipe has no protective screening. Any of these activities mentioned in 3b-1 requires increased worker activity "over the pool". Any item used by the worker which could drop into the pool might be drawn into the suction pipe and cause a blockage. We concede that worker activity probably would not endanger the "filling" pipe.

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3d-1 "Increased worker activity" would include: re-positioning spent fuel assemblies after removal from the core (moving them from one storage location to another); monitoring the spent fuel for leaks or corrosion.

3d-2 A) Volume of SFP coolant water might be lost due to :

- worker accident: dropping loads onto piping or into the SFP and thereby breaking the pool liner
- pump or pipe leaks caused by material drawn into the SFP coolant water loop through the un-screened suction pipe

B&C) Loss of service water pumps and loss of volume of service water through the heat exchangers is not likely as a result of increased worker activity - it is, however, possible that increased worker activity would allow a greater chance of worker sabotage to these components.

3e-1 "Increased worker activity" includes the increased monitoring necessitated by the increased number of stored assemblies.

3e-2 Workers can make mistakes, workers can cause accidents, workers can intentionally cause damage. The more man-hours spent in and around the SFP, the greater is the risk of accident or sabotage.

5 -1 Pool failure (leakage) could result from: worker sabotage, seismic events, falling aircraft.

5 -2 The expanded storage, necessitating increased worker activity, will provide for greater chances of worker accidents and sabotage. It may also offer a more attractive-target for "terrorist attacks".

6- 1 "Increased activity" refer to increased worker activity.

6- 2 See 3d-2A

- 9-1 1) Loss of SFP coolant water by leakage.  
2) Loss of SFP coolant water by pump breakdown.  
3) Leakage or corrosion of the stored spent fuel assemblies.  
4) Sabbotage or threatened sabbotage.
- 9-2 Increased worker activity may lead to greater accident risk and sabbotage risk. Increased length of storage increases the corrosion possibilities and the increased number of stored assemblies may increase the attractiveness of the site for terrorist activities.
- 9-3 Plans are outdated as they contain resources such as physicians who are no longer present in the community. In a disaster situation, Two River's Community Hosp. would not be able to handle mass emergencies in their one isolated room. Further, local law enforcement agencies and civil defense personnel are unaware of the assistance that they will be required to give during such an occurrence, whether it be medical or an evacuation procedure. Further, the emergency plan has never been tested.

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