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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of)
)
PENNSYLVANIA POWER & LIGHT COMPANY)
)
) and)
ALLEGHENY ELECTRIC COOPERATIVE, INC.)
)
(Susquehanna Steam Electric Station,)
Units 1 and 2))

Docket Nos. 50-387
50-388

APPLICANTS' RESPONSE TO
APPEAL BOARD'S OCTOBER 26, 1982 ORDER

In its Order dated October 26, 1982, the Appeal Board requested that Applicants and the Staff provide certain information concerning reactor coolant system leak rate detection. The Appeal Board pointed to testimony by Applicants concerning unidentified leakage from the reactor coolant system and to the Technical Specifications for Susquehanna Steam Electric Station, Unit 1, and noted an apparent inconsistency with NUREG-0313, Rev. 1 ("Technical Report on Material Selection and Processing Guidelines for BWR Coolant Pressure Boundary Piping", July 1980) (Staff Ex. 6) and the standard technical specifications for boiling water reactors. Applicants hereby provide their response to the Appeal Board's Order. The response is supported by the attached Affidavit of Walter J. Rhoades.

Contention 7B in this proceeding alleged that "the cracking of stainless steel piping in BWR coolant water environments due to stress corrosion has yet to be prevented or avoided." On August 31, 1981, Applicants filed a motion for summary disposition of this contention. The Staff supported Applicants' motion. In its October 21, 1981 Memorandum and Order on Summary Disposition Motions, the Licensing Board denied the motion, identifying two aspects of the contention which it believed should be ventilated during the hearing. These aspects were the experience with low-carbon stainless steel and "the efficacy of the applicants' leak detection system."

At the evidentiary hearing, Applicants and the Staff introduced direct testimony relating to Contention 7B.^{1/} Additional documentary material was introduced, including excerpts from the Final Safety Analysis Report dealing with the leak detection system, foll. Tr. 1944, and Applicants' responses to NUREG-0313, Rev. 1, foll. Tr. 1933 and 1935. The Licensing Board propounded several questions to the three witnesses. One of the Licensing Board's questions to Applicants' witness Rhoades asked how the leak detection system worked. In response to this question, Mr. Rhoades stated that

[O]nce the leakage -- the unidentified leakage increases by more than one gpm per hour in a given hour..., then the plant is by technical specifications shut down....

^{1/} NRC Staff Testimony of Felix B. Litton Regarding Stress Corrosion Cracking in BWR Stainless Steel Piping, foll. Tr. 1927; Affidavit of Walter J. Rhoades in Support of Summary Disposition of Contention 7B, foll. Tr. 1939; Affidavit of Joseph C. Lemaire in Support of Summary Disposition of Contention 7B, foll. Tr. 1917.

Tr. 1940. That statement was (and is) incorrect. Rhoades Affidavit, para. 4. Unfortunately, the error was carried forward in Applicants' proposed findings^{2/} and the Licensing Board's Initial Decision.^{3/}

As set forth in Mr. Rhoades' Affidavit attached hereto, his response to the Licensing Board's question should have stated that the leak detection system is capable of detecting leakages of 1 gpm, that the technical specifications will require plant shutdown for unidentified leakage of 5 gpm, and that the technical specifications will also require plant shutdown if unidentified leakage increases by 2 gpm or more in a four-hour period. Rhoades Affidavit, para. 4. The correct answer to the Licensing Board's question is consistent with the Final Safety Analysis Report, the Staff's recommendations in NUREG-0313, Rev. 1, Applicants' commitments to the Staff, and Mr. Rhoades' written testimony. Rhoades Affidavit, para. 5.

The current Technical Specifications for Unit 1 include a limit on unidentified leakage (5 gpm) and a limit of total leakage (25 gpm averaged over a 24-hour period). Rhoades Affidavit, para. 6. They do not, however, include a limit on the increase in unidentified leakage. Applicants recognize that such a limit should be included in order to be consistent with NUREG-0313, Rev. 1, and

^{2/} Applicants' Proposed Findings of Fact and Conclusions of Law in the Form of an Initial Decision, dated November 23, 1981, at 57-58.

^{3/} LBP-82-30, 15 N.R.C. 771, 823 (1982).

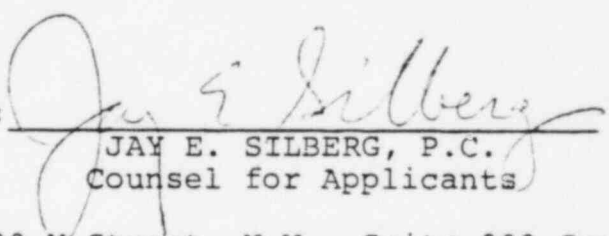
are now preparing a proposed amendment which would include in the Unit 1 Technical Specifications a limitation on the increase in unidentified reactor coolant system leakage of 2 gpm within a four-hour period. Id.

Applicants believe that incorporating this additional Technical Specification should resolve the sua sponte question raised in the Appeal Board's October 26, 1982 Order. Although the Licensing Board's Initial Decision referred to Mr. Rhoades' erroneous testimony, we do not believe that this single incorrect statement was necessary to the resolution of Contention 7B or that its deletion could change the outcome with respect to that issue. This is particularly true in view of the uncontroverted evidence on the adequacy of the guidance set forth in NUREG-0313, Rev. 1, and Applicants' compliance with that guidance.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

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