

November 1, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

Before the Atomic Safety and Licensing Board

In the Matter of)
)
CLEVELAND ELECTRIC ILLUMINATING)
COMPANY, Et Al.)
)
(Perry Nuclear Power Plant,)
Units 1 and 2))

'82 NOV -3 A10:28

Docket Nos. 50-440

(Operating License) SECRETARY
& SERVICE
BRANCH

OCRE SUPPLEMENTAL RESPONSE TO APPLICANTS'
SECOND SET OF INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS TO INTERVENOR
SUNFLOWER ALLIANCE, INC. ET AL.

Intervenor Ohio Citizens for Responsible Energy ("OCRE") hereby updates the responses made by Sunflower Alliance, Inc. et al. to Applicants' Second Set of Interrogatories to Sunflower Alliance, dated May 3, 1982. These interrogatories pertain to Issue #4, for which OCRE is now lead intervenor (see September 17, 1982 Memorandum and Order, Concerning Procedural Motions).

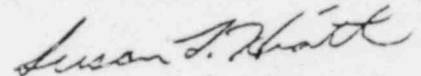
1. (e) OCRE would note that Applicants have now provided NEDO-20566, Amendment 3 to intervenors; this document addresses the European core spray tests in steam. However, OCRE does not change its conclusions regarding the adequacy of the NEDO-24712 methodology.
- (n) It is never specifically stated in NEDO-24712 whether the SSTF simulated fuel bundles use an 8x8 fuel rod array.
- (i) The NEDO-24712 methodology does not satisfy the requirements listed in the "Request for Additional

Information" attached to the February 3, 1978 letter from Eisenhut and Ross, NRC, to G. Sherwood, GE; specifically:

- (1) It is not stated why GE believes that the SSTF can accurately or conservatively represent the conditions in a real BWR following a LOCA.
- (2) It is not stated how the SSTF is utilized to investigate the closely coupled relationship of core spray distribution and counter-current-flow-limiting phenomena.
- (3) It is not stated how the SSTF can investigate the effects of different steam qualities that might be present under realistic conditions; e.g., entrained water droplets in steam may interact with the core spray.
- (4) There appears to be incomplete information regarding the size of the steam condensing region around a nozzle; item 6 of the NRC's "Request for Additional Information" states that 25% of the total steam condensation may occur in the "hydrodynamic" region; this information does not appear in NEDO-24712, nor are the references mentioned in item 2 of the request cited in NEDO-24712.
- (5) NEDO-24712 does not justify the assumption that $\frac{1}{2}$ of the Appendix K core spray heat transfer coefficients can be used when spray flow is below the minimum design flow (item 17 of the request).

7. (d) OCRE has now received the attachment to the February 3, 1978 letter and has no objections to same, except that some of the requirements appear not to have been met or addressed, as discussed in subpart (1) of the response to Interrogatory 1.

Respectfully submitted,



Susan L. Hiatt
OCRE Representative
8275 Munson Rd.
Mentor, OH 44060
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AFFIDAVIT

I, Susan L. Hiatt, having been duly sworn depose and say that I am responsible for the foregoing supplemental responses to interrogatories filed by Applicants and that these responses are true to the best of my knowledge and belief.

Susan L. Hiatt

Susan L. Hiatt

Sworn to and subscribed before me this 1st day of November, 1982.

Marley Ford Eiger

Notary Public

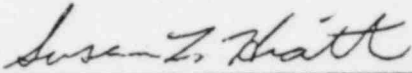
MARLEY FORD EIGER, Attorney At Law
Notary Public - State of Ohio
My commission has no expiration date,
Section 147.03 R. C.

CERTIFICATE OF SERVICE

DOCKETED
USNRC

This is to certify that copies of the foregoing OCRE
SUPPLEMENTAL RESPONSE TO APPLICANTS' SECOND SET OF INTER-
ROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS TO IN-
VENOR SUNFLOWER ALLIANCE, INC. ET AL. were served by deposit
in the U.S. Mail, first class, postage prepaid, this 1st day
of November, 1982 to those on the service list below.

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH


Susan L. Hiatt

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