

November 12, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSIONDOCKETED  
JAN 1983Before the Atomic Safety and Licensing Board<sup>82</sup> NOV 15 P1:13

In the Matter of )

CLEVELAND ELECTRIC ILLUMINATING )  
COMPANY, Et Al. )(Perry Nuclear Power Plant, )  
Units 1 and 2 )Docket Nos. 50-440 ANCH  
50-441  
(Operating License)OHIO CITIZENS FOR RESPONSIBLE ENERGY EIGHTH  
SET OF INTERROGATORIES TO APPLICANTS

Intervenor Ohio Citizens for Responsible Energy ("OCRE") hereby files its Eighth Set of Interrogatories to Applicants, pertaining to Issue #9. The Licensing Board, in its September 16, 1982 Memorandum and Order (Concerning Scheduling) set October 15 as the date for the close of discovery on Issue #9. On October 15, OCRE moved to extend this deadline to November 1, for reasons explained in the motion. On November 1, OCRE moved to extend this deadline further, to a week following OCRE's receipt of documents requested of Applicants. During the November 10 conference call, the Licensing Board granted OCRE's motion, with the requirement that OCRE offer a clear explanation for each interrogatory of why the delay was necessary. These explanations are grouped below, to avoid unnecessary repetition.

For Interrogatories 8-1 to 8-4: These interrogatories request clarification of or further information regarding documents requested by OCRE, which were received on November 4. Applicants, in answering OCRE's Third Set of Interrogatories, referred OCRE to various documents available for inspection at PNPP. Applicants filed their answer on September 14; OCRE, being busy with other matters until October 1, tried thereafter to contact Mr. Ronald Wiley, Applicants' contact person at PNPP. For several days the phone was continually busy; one day the phone system was totally out of order. On October 7 OCRE was finally able to get through to the plant, only to be told that Mr. Wiley was on vacation. OCRE then asked if another person might be able to help; the answer received was that OCRE would have to wait until Mr. Wiley returned, on October 12. Only after conferring with Mr. Wiley did OCRE learn that these documents could only be inspected on a Sunday, as they were working documents that could not be removed from the site during the week; the first Sunday available was October 24. Upon inspecting these documents on October 24, OCRE found that they were of such a voluminous nature that only a cursory inspection

would be possible at that time and requested copies of some of the documents to be examined in more detail at a later time. When OCRE filed its original motion to extend discovery on Issue #9, it assumed that the copies of the documents would be provided well before November 1. When it became apparent that they would not be, OCRE filed its motion to extend further the deadline for discovery on Issue #9. OCRE received the documents on November 4; for these reasons the delay until this time was necessary.

For Interrogatories 8-5 to 8-8: These interrogatories request clarification of or further information regarding FSAR Section 3.11, Amendment 9. This was one of the documents to be provided at PNPP. OCRE did not request a copy of same, because OCRE has use of the FSAR copy that Applicants have provided to Mr. Daniel D. Wilt, counsel for Sunflower Alliance, Inc. et al. OCRE has limited financial resources and therefore did not request a copy of this amendment from Applicants, at a cost of \$.010 per page, when a copy would be readily available at no charge. OCRE did not receive the FSAR amendment until November 7, 1982 from Mr. Wilt.

#### INTERROGATORIES

- 8-1. Exactly what type of polymer is Rockbestos Polymer LD? This substance is used as electrical insulation in cables manufactured by Rockbestos Co., which are used in PNPP (e.g., types EKC-- 81, 82, 83, 84, 85, 92, 93, 94, 95 ).
- 8-2. Section 2:07.10 of GAI Conformed Specification SP-567-4549-00 states that cable jackets shall be heavy duty chlorosulfonated polyethylene. Yet the cables (EFK-1 to EKF-35) which reference this specification have hypalon listed as the cable jacket material. Is hypalon the same as chlorosulfonated polyethylene? If not explain.
- 8-3. Some of the circuits listed in "Circuits by Equipment for PNPP, Unit 1" used cables identified as VFC-57, VFC-13, VFC-16, and VFC-17. These items appear not to have been referenced in the GAI Conformed Specifications provided. Please produce specifications for these cables as well.
- 8-4. The GAI Conformed Specifications (e.g., SP-561-4549-00) state that the cables shall be suitable for operation with an integrated gamma radiation dose of 35 megarads in carbon, integrated over 40 years.
  - (a) What is meant by 35 megarads in carbon?
  - (b) What dose rate, in rads/hour, is used for the gamma radiation? For the neutron radiation?
  - (c) Is the maximum dose rate of "0.18 Megarads per hour, in carbon" listed

for design basis event conditions the actual dose rate used to qualify the material? If not, explain.

- 8-5. FSAR Section 3.11.2.1.3.5 (Amendment 9) states that a "well-supported maintenance/surveillance program in conjunction with a good preventive maintenance program will assure that equipment that meets the specification is qualified for the designed life." Please describe in detail the maintenance/surveillance and preventive maintenance programs Applicants will use for electrical cable insulation. Specifically, how will degradation be detected and corrected? At what intervals will cables be inspected? How will cables in conduit or in other inaccessible locations be inspected?
- 8-6. FSAR Section 3.11 is unclear as to who is to perform the qualification of electrical equipment, vendor, Applicants, or some third party? Please clarify.
- 8-7. Which of the four options listed in FSAR Section 3.11.2.2.1.7 is utilized for aging of electrical cable?
- 8-8. FSAR Section 3.11.2.2 states that safety-related electrical equipment in a harsh environment supplied by General Electric is qualified under NEDE-24326-P.
- (a) Does GE supply any safety-related electrical cables used in a harsh environment? If so, list all such cables and provide their specifications.
  - (b) If so, please produce NEDE-24326-P, under an appropriate protective agreement.

Respectfully submitted,

*Susan L. Hiatt*

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CERTIFICATE OF SERVICE

DOCKETED  
JAN 10

NOV 15 1982 11:13

This is to certify that copies of the foregoing OHIO CITIZENS FOR RESPONSIBLE ENERGY EIGHTH SET OF INTERROGATORIES TO APPLICANTS were served by deposit in the U.S. Mail, first class, postage prepaid, this 12th day of November 1982 to those on the service list below.

*Susan L. Hiatt*

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