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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '81 NOV 23 P5:24
ATOMIC SAFETY AND LICENSING BOARD *ers*

Before Administrative Judges
Sheldon J. Wolfe, Chairman
Dr. Paul W. Purdom
Frederick J. Shon

SECRETARY
OF SERVICE
NRC

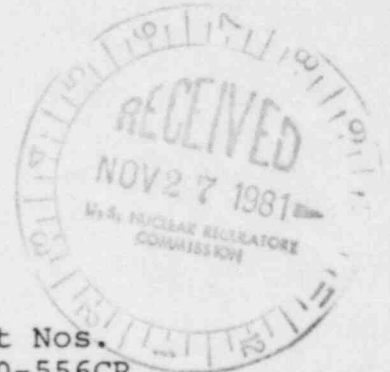
In the Matter of)

Public Service Company of Oklahoma,)
Associated Electric Cooperative, Inc.)
and)

Western Farmers Electric Cooperative)

(Black Fox Units 1 and 2))

Docket Nos.
STN 50-556CP
STN 50-557CP



INTERVENORS' PROPOSED CONTENTIONS FOR THE
CONTINUED RADIOLOGICAL AND SAFETY HEARINGS
RELATING TO HYDROGEN CONTROL ISSUES

Pursuant to the Board's Orders of October 14, 1981, and November 12, 1981, Intervenors respectfully propose the following contention in light of the Applicant's Amendment No. 18 to the Black Fox Station (BFS) Preliminary Safety Analysis Report (PSAR).

Intervenors submit that the following Contention should be the subject of evidentiary hearings in view of the Applicant's Amendments in response to NRC licensing requirements arising out of, inter alia, the TMI-2 accident. Intervenors also understand that the NRC may impose additional TMI-

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related requirements (as identified in NUREG-C660) on NTCP applicants in the near future and this contention is without prejudice to Intervenor's right to challenge the sufficiency of Applicant's response to any such additional requirements.

HYDROGEN CONTROL MEASURES

The Applicant has not demonstrated that the hydrogen control measures intended for use at Blaine Fox will safely accommodate the equivalent of a 100% fuel-clad metal water reaction as identified by NUREG-0718, II.B.8 and as required by 10 CFR 50.34(e) and 50.35(a). Specifically, there are concerns regarding:

1. The time rate of hydrogen generation within the degraded core.
2. The rate at which the hydrogen would be released to containment.
3. Verification of the hydrogen migration model.
4. Acceptability of the manual initiation control system..
5. Qualification of the ignitors and associated components.
6. Qualification of in-containment safety-related equipment to withstand the conditions associated with repeated hydrogen burns.

7. Qualification of the containment itself to withstand repeated hydrogen burns.
8. Effectiveness of the distributed ignition system (DIS) surveillance testing to assure a fully operable system.

The preliminary nature of the verification program is evidenced by, among other things, the list of ongoing and planned verification tests contained in Table (2)(ix)-1 of Amendment 18. Since the proposed DIS system is still under development, it obviously has not been demonstrated to be fully effective for the control of a large hydrogen release.

Respectfully submitted,

FELDMAN, HALL, FRANDEN & WOODARD

By Nancy L. Woods
Nancy L. Woods
816 Enterprise Building
Tulsa, OK 74103

DATED: November 20, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
ATOMIC SAFETY AND LICENSING BOARD

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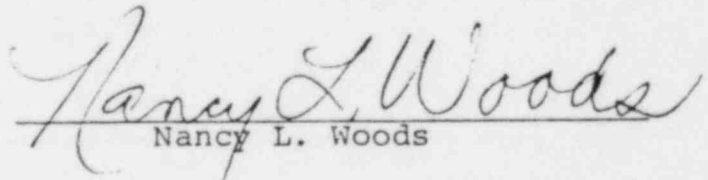
(Black Fox Units 1 and 2))

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CERTIFICATE OF SERVICE

I, Nancy L. Woods, one of the attorneys for Citizens Action for Safe Energy ("CASE"), certify that copies of the following pleadings have been served on the persons shown on the attached list by United States Mail, postage prepaid, on this 20th day of November, 1981:

1. Intervenors' Proposed Contentions for the Continued Radiological and Safety Hearings;
2. Intervenors' Reply to Applicants and NRC Staff's Motions to Reopen;
3. Intervenors' Supplement to Motion to Reopen the Radiological and Safety Hearings;
4. Intervenors' Errata.


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related requirements (as identified in NUREG-0660) on NTCP applicants in the near future and this contention is without prejudice to Intervenor's right to challenge the sufficiency of Applicant's response to any such additional requirements.

HYDROGEN CONTROL MEASURES

The Applicant has not demonstrated that the hydrogen control measures intended for use at Black Fox will safely accommodate the equivalent of a 100% fuel-clad metal water reaction as identified by NUREG-0718, II.B.8 and as required by 10 CFR 50.34(e) and 50.35(a). Specifically, there are concerns regarding:

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