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USNRC

SAN LUIS OBISPO MOTHERS FOR PEACE
before the
ATOMIC SAFETY AND LICENSING BOARD

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In the matter of
Pacific Gas and Electric Co.
Diablo Canyon Nuclear Power Plant
Unit Nos. 1 and 2
Facility Operating Licenses
No. DPR-80 and DPR-82

OFFICE OF SECRETARY
DOCKETING & SERVICE
Docket No. 50-275-OLA-2
50-323-OLA-2
ASLBP No. 92-669-03-OLA-2
April 12, 1993

Intervenor San Luis Obispo Mothers for Peace
Third Late-Filed Contention

In accordance with 10 CFR 2.714(a)(1), this document supplements the San Luis Obispo Mothers for Peace Supplement to Petition to Intervene. The San Luis Obispo Mothers for Peace ("SLOMFP") has been granted a hearing and petition for leave to intervene in the proceeding involving the proposed amendment of the operating licenses for the Diablo Canyon Nuclear Power Plant ("DCNPP"), Units 1 and 2. Prehearing Conference Order (Ruling Upon Intervention Petition and Authorizing Hearing)(January 21, 1993). This amendment would extend the life of those licenses by more than 13 years for Unit 1 and almost 15 years for Unit 2. For the reasons set forth below, the SLOMFP is submitting the following to supplement its original Supplement to Petition to Intervene.

XII. The San Luis Obispo Mothers for Peace contends that deficiencies exist at the DCNPP with the environmental qualification of safety-related and non-safety-related electrical cables (Okonite cables or other cables with bonded jackets). Furthermore, deficiencies exist in the adequacy of maintenance and surveillance practices at DCNPP to verify that the actual operating environment of these cables are bounded by the environmental parameters used to qualify the equipment. Because these deficiencies make

the plant more vulnerable to a severe accident, Pacific Gas and Electric Company's ("PG&E") license amendment request must be denied.

SLOMFP believes that there may be some overlap in content with Contention I (Maintenance and Surveillance). But SLOMFP foresees that there may be some aspects of this specific problem that may not be covered under Contention I.

Basis: Several cable failures have occurred at DCNPP:

On February 5, 1993, an electrical fire occurred at DCNPP in Unit 1 cable spreading room as a result of an electrical ground in the No. 11 Circulating Water Pump. Event # 25029 (February 6, 1993). PG&E pulled a length of Unit 1, 12kV circulating water pump cable and found that approximately 200 feet of the total 440 feet of cable showed signs of degradation. The vendor (Dkonite) indicated that "the degradation is unprecedented and has not been seen by the industry previously." Region V Morning Report (February 17, 1993).

There have been three occasions since 1989 in which the Auxiliary Salt Water (ASW) system 4.16 kV safety-related cable has failed, apparently due to submergence. The first failure of this type of cable was in October 1989 on ASW pp 2-2. The second failure was in May of 1992 on the Bus 14E feeder. The most recent of these failures took place in November of 1992 on ASW 1-2 feeder cable. The Onsite Safety Review Group (OSRG) expressed concerns regarding the reportability of these failures and lack of documentation for the acceptability of potentially degraded cable. All three insulation failures occurred in the vicinity of the first circuit pull box outside the turbine building. OSRG concludes that "the cable has

been degraded due to repeated submergence over the past 20 years." OSRG (November 1992 Monthly Report) Enclosure 1, at 2.

Additionally, the NRC has issued an information notice and alerted all holders of operating licenses or construction permits for nuclear power reactors of the qualification test results which indicate that Okonite cable with bonded Hypalon jackets may be susceptible to failure. Furthermore, other bonded-jacket cables may be susceptible to the same type of failures. NRC Information Notice 92-81: Potential Deficiency of Electrical Cables with Bonded Hypalon Jackets (December 11, 1992).

Other internal NRC documents demonstrate NRC concern regarding failures of Okonite electrical cables with bonded jackets:

1) In an NRC Memorandum for Commissioners Rogers, Curtiss, Remick and de Planque from James Taylor dated December 10, 1992, the Commission was notified of the potential deficiency in the environmental qualification of these types of cables. It reviewed test results and identified the variety of cables experiencing failures. Also enclosed was a "Task Action Plan Outline for Bonded-Jacket Cables" (December 29, 1992).

2) In a letter to William Rosin of NUMARC from William Russell, Office of Nuclear Reactor Regulation (NRR) dated December 22, 1992, the NRC notified NUMARC of the deficiency in the environmental qualification of electrical cables with bonded jackets and inquired about their interest in being the focal point for industry in resolving this issue. It noted that "much of the Sandia test data that are the basis for the IN and the NRC concerns have not yet been published."

3) Ashok Thadani sent a Memorandum to Steven Varga, Jack Roe and William Travers (all from NRR) on January 27, 1993. In this memorandum,

Mr. Thodani informed the recipients of the recent developments regarding failures of Okonite and other bonded-jacket electrical cables. He further advised them that their assistance in formulating the Generic Letter may be required.

Justification for Late-Filed Contention

1) SLOMFP has good cause to file Contention XII at this time because the information has only recently been made available to SLOMFP. Robert Pollard, a nuclear engineer at the Union of Concerned Scientists, recently received a set of internal NRC documents (the Region V Morning Report of February 17, 1993 and 1 through 3 noted above). He received these documents anonymously. He forwarded this information to SLOMFP on March 25, 1993. SLOMFP received the OSRG meeting notes from PG&E discovery response to document requests at the site visit on March 16, 1993. The importance of the OSRG information regarding the three ASW cable failures was not apparent until SLOMFP received the internal NRC documents. SLOMFP has since moved forward to file additional discovery regarding Okonite cables with bonded jackets and filed written interrogatories and requests for the production of documents to both PG&E and the NRC (April 2, 1993). Additionally, SLOMFP consultants from MHB Technical Associates, Greg Minor and Steven Sholly, reported their concerns regarding the cable degradation at DCNPP to Dr. Ashok Thodani of NRR. SLOMFP served their letter to the Licensing Board on April 2, 1993.

SLOMFP has proceeded as quickly as possible to evaluate the information and to assemble enough evidence in support of Contention XII to satisfy the Commission's standard for admissibility of the contention.

2) No other forum exists by which SLOMFP can be heard by an impartial judge and have its interests protected.

3) SLOMFP's participation in the litigation of this contention will lead to the development of a sound record. SLOMFP has obtained technical assistance in preparing its case on this issue and expects to be able to provide expert testimony on the significant risks posed by the degraded cable and its impact on the proposed operating license extension.

4) There is no other party to this case which can represent SLOMFP's interests.

5) Admission of this contention at this time can be expected to broaden and delay this proceeding. However, any such delay would not be the fault of SLOMFP. Moreover, the litigation of this issue would not prevent or delay the operation of DCNPP.

6) Environmental qualification is an extremely important issue with tremendous safety significance.

Respectfully Submitted,

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