

June 30, 1981



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

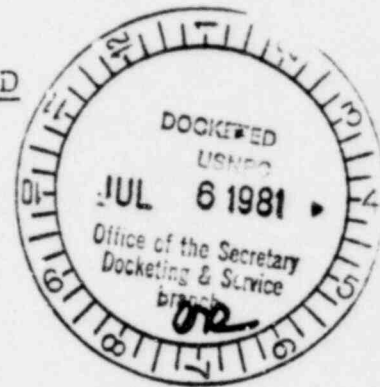
In the Matter of

TEXAS UTILITIES GENERATING
COMPANY, ET AL.(Comanche Peak Stream Electric
Station, Units 1 and 2)

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Docket Nos. 50-445
50-446

(Application for
Operating License)



CFUR'S FIFTH SET OF INTERROGATORIES
TO APPLICANTS AND REQUESTS TO PRODUCE

Pursuant to 10 C.F.R. §§ 2.740b and 2.741, Citizens for Fair Utility Regulation ("CFUR"), hereby serves CFUR's Fifth Set of Interrogatories and Requests to Produce upon Texas Utilities Generating Company, et al. ("Applicants"). Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to Applicants, its officers, directors or members as well as any pertinent information known to its employees, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of Applicants, its officers, directors or members as well as its employees, advisors or counsel. In answering each interrogatory and in responding to each request, please recite the interrogatory or request preceding each answer or response.

These interrogatories and requests shall be continuing in nature. Thus, any time Applicants obtain information which renders any previous response incorrect or indicates that a response was incorrect when made, Applicants should supplement its previous response to the appropriate interrogatory or request to produce.

Applicants should also supplement its responses as necessary with respect to

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identification of each person expected to be called at the hearing as an expert witness, the subject matter of his or her testimony and the substance of that testimony. The term "documents" shall include any writings, drawings, graphs, charts, photographs and other data compilations from which information can be obtained. We request that at a date or dates to be agreed upon, Applicants make available for inspection and copying all documents subject to the requests set forth below.

Interrogatories

1. State the maximum distance from CPSES which must be analyzed to determine the effect of radioactive releases on the general public?

2. What are your bases (legal and/or other) for your response to the preceding interrogatory?

3. Where in the FSAR is it described how the requirements of 10 CFR § 20.1(c) will be met?

4. Section 11.1 of the FSAR states:

The source terms for the effluent release analysis are based on the realistic model for reactor coolant activity as formulated as a draft standard for the American Nuclear Society. (emphasis added)

What are your legal bases for the use of a "realistic model" versus the use of a "conservative model" for source terms for shielding design and for component failure?

5. What are your bases (legal and/or other) for the use of the "draft standard" as stated in Section 11.1 of the FSAR?

6. Section 11.1.2 of the FSAR states:

The Gaseous Waste Processing System is assumed to strip fission gases from the volume control tank. The overall η parameter, as given in Reference [2] is interpreted as being equivalent to the stripping fractions. (emphasis added)

a. Why was it "assumed" that the Gaseous Waste Processing System would strip fission gases from the volume control tank?

b. What is the reliability of the Gaseous Waste Processing System?

c. What are your technical bases for your response to the preceeding subpart of this interrogatory?

d. Why is it necessary to use the word "interpreted" in the above-quoted passage?

e. Provide your technical bases for the interpretation referenced above.

f. Provide your legal bases for the above interpretations.

7. How much additional radioactive gases (that is, radioactive gases generated in addition to the amount normally generated) by each of the accidents listed in FSAR Section 15.0.1.2, Condition II - Faults of Moderate Frequency? Please list the quantity of gas separately for each listed accident. Please provide source term data (isotope and quantity) separately for each listed accident.

8. How much additional radioactive gases (that is, radioactive gases generated in addition to the amount normally generated) by each of the accidents listed in FSAR Section 15.0.1.3, Condition III - Infrequent Faults? Please list the quantity of gas separately for each listed accident. Please provide source term data (isotope and quantity) separately for each listed accident.

9. How much additional radioactive gases (that is, radioactive gases generated in addition to the amount normally generated) by each of the accidents listed in FSAR Section 15.0.1.4, Condition IV - Limiting Faults? Please list the quantity of gas separately for each listed accident. Please provide source term data (isotope and quantity) separately for each listed accident.

10. With respect to the accidents listed in FSAR Section 15.0.1.2, Condition II - Faults of Moderate Frequency, please answer the following separately for each accident:

- a. What is the probability of occurrence for each fault?
- b. What is the variance for each probability of occurrence?
- c. Provide your technical bases for your responses to the preceding subparts of this interrogatory.

11. With respect to the accidents listed in FSAR Section 15.0.1.3, Condition

III - Infrequent Faults, please answer the following separately for each accident:

- a. What is the probability of occurrence for each fault?
- b. What is the variance for each probability of occurrence?
- c. Provide your technical bases for your responses to the preceding subparts of this interrogatory.

12. With respect to the accidents listed in FSAR Section 15.0.1.4, Condition

IV - Limiting Faults, please answer the following separately for each accident:

- a. What is the probability of occurrence for each fault?
- b. What is the variance for each probability of occurrence?
- c. Provide your technical bases for your responses to the preceding subparts of this interrogatory.

13. What effect would a single occurrence of "loss of normal feedwater flow" (Fault No. 10 - FSAR Section 15.0.1.2) have on Figure 11.3-4 if this accident occurred at the end of the first year of operation?

14. What effect would the "loss of normal feedwater flow" (Fault No. 10 - FSAR Section 15.0.1.2), which occurs with the frequency of once per year, each year, from the first year through the fortieth year of operation, have on Figure 11.3-4?

15. Please provide a table listing the data responsive to the two preceding interrogatories.

16. What effect would a single occurrence of each of the other accidents listed in FSAR Section 15.0.1.2 have on Figure 11.3-4 if each such accident occurs

alone at the end of the first year of operation? Please answer separately for each listed accident.

17. What effect would the occurrence of each of the other accidents listed in FSAR Section 15.0.1.2, if each occurred with the frequency of once per year, each year, from the first through the fortieth year of operation, have on Figure 11.3-4? Please answer separately for each listed accident.

18. Please provide a table listing the data responsive to the two preceding interrogatories. Please provide separate tables for each accident inquired about in both interrogatories.

19. How much unused capacity of the GWPS is necessary in order to preclude the release of radioactive effluents during unfavorable environmental conditions during the occurrence of each of the accidents listed in FSAR Section 15.0.1.2, Condition II - Faults of Moderate Frequency? Please answer separately for each listed accident.

20. How much unused capacity of the GWPS is necessary in order to preclude the release of radioactive effluents during unfavorable environmental conditions during the occurrence of each of the accidents listed in FSAR Section 15.0.1.3, Condition III - Infrequent Faults? Please answer separately for each listed accident.

21. How much unused capacity of the GWPS is necessary in order to preclude the release of radioactive effluents during unfavorable environmental conditions during the occurrence of each of the accidents listed in FSAR Section 15.0.1.4, Condition IV - Limiting Faults? Please answer separately for each listed accident.

22. What are your technical bases for your responses to the preceding three interrogatories?

23. How much unused capacity of the GWPS is necessary in order to preclude the release of radioactive effluents during unfavorable environmental conditions during the occurrence of accidents more serious than Condition IV? Please identify the accident sequence determined to be the limiting accident.

24. What are your bases (legal and/or other) for your response to the preceding interrogatory?

25. Have you prepared any report, study or analysis with respect to the following Contentions:

- a. Contention 1;
- b. Contention 2;
- c. Contention 3;
- d. Contention 4;
- e. Contention 7;
- f. Contention 9;
- g. Board Question No. 1;
- h. Board Question No. 2;
- i. Board Question No. 3.

If so, please identify each such report, study or analysis by subject and author, including the employer, place of employment, title, business address and business telephone number of the author. Please provide for inspection and copying each such report, study or analysis.

26. Describe in detail the provisions made and the steps taken to assure that CPSES 1 and 2 reactor operators have been adequately trained prior to power operation of CPSES 1 and 2.

27. Describe in detail the provisions made and the steps taken to assure that conditions are safe to commence power operation of CPSES 1 and 2.

28. Describe in detail all manuals, instructions, procedures and other documents which support your responses to the two preceding interrogatories. Please make all such manuals, instructions, procedures and documents available for inspection and copying.

29. What is the volume of the containment for CPSES 1 and 2?

30. What quantity of hydrogen gas would be produced at CPSES 1 and 2 if the same relative quantity as was produced at TMI-2 is produced at CPSES 1 and 2?

31. What pressure would be produced if instantaneous combustion of the quantity of hydrogen gas listed in your response to the preceding interrogatory were to occur?

32. Have any special or additional measures been incorporated to handle hydrogen gas in the CPSES containment structure since the TMI-2 accident? Answer separately for Unit 1 and Unit 2.

33. If your response to the preceding interrogatory is anything but "No," answer the following, separately for Unit 1 and Unit 2:

a. Describe in detail the special or additional measures incorporated.

b. Describe in detail all documents reflecting the special or additional measures incorporated.

c. Provide for inspection and copying of all documents listed in your response to the preceding subpart of this interrogatory.

34. If your response to interrogatory 32 is not affirmative, provide your bases (legal and/or other) for that response.

35. Have any special additional measures been incorporated to handle hydrogen gas in the CPSES primary coolant loops since the TMI-2 accident? Answer separately for Unit 1 and Unit 2.

36. If your response to the preceding interrogatory is anything but "No," please answer the following, separately for Unit 1 and Unit 2:

a. Describe in detail the special or additional measures incorporated.

b. Describe in detail all documents reflecting the special or additional measures incorporated.

c. Provide for inspection and copying of all documents listed in your response to the preceding subpart of this interrogatory.

37. If your response to interrogatory 35 is not affirmative, provide your bases (legal and/or other) for that response.

38. Describe in detail what management and administrative actions have been initiated by the Applicants prior to the request for issuance of an operating license in order to resolve Safety Issue TAP A-9 (ATWS) as it relates to CPSES 1 and 2?

39. Describe in detail what management and administrative actions have been initiated by the Applicants subsequent to the request for issuance of an operating license in order to resolve Safety Issue TAP A-9 (ATWS) as it relates to CPSES 1 and 2?

40. Describe in detail what financial actions have been initiated by the Applicants prior to the request for issuance of an operating license in order to resolve Safety Issue TAP A-9 (ATWS) as it relates to CPSES 1 and 2.

41. Describe in detail what financial actions have been initiated by the Applicants subsequent to the request for issuance of an operating license in order to resolve Safety Issue TAP A-9 (ATWS) as it relates to CPSES 1 and 2.

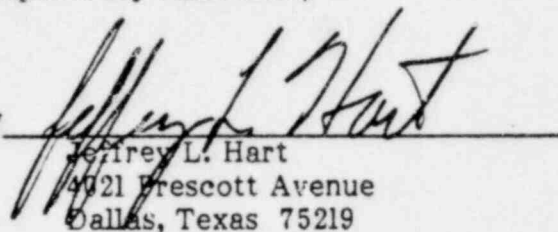
42. Describe in detail what technical actions have been initiated by the Applicants prior to the request for issuance of an operating license in order to resolve Safety Issue TAP A-9 (ATWS) as it relates to CPSES 1 and 2.

43. Describe in detail what technical actions have been initiated by the Applicants subsequent to the request for issuance of an operating license in order to resolve Safety Issue TAP A-9 (ATWS) as it relates to CPSES 1 and 2.

44. Describe in detail all documents which support responses to the preceding six Interrogatories. Please make all such documents available for inspection and copying.

Respectfully submitted,

By


Jeffrey L. Hart
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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing CFUR's Fifth Set of Interrogatories to Applicant and Requests to Produce has been forwarded to all parties and counsel of record this 30th day of JUNE, 1981 by first class mail.

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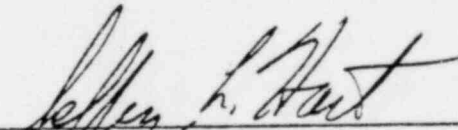
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