

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY  
NUCLEAR SERVICE  
BRANCH

Before the  
ATOMIC SAFETY AND LICENSING BOARD

In the matter of:	)	
	)	
	)	
PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE)	)	Docket Nos.: 50-443
ET AL.	)	and
	)	50-444
	)	
(Seabrook Station, Units 1 and 2)	)	January 7, 1983

THE STATE OF NEW HAMPSHIRE'S THIRD SET OF INTERROGATORIES  
AND REQUEST FOR PRODUCTION OF DOCUMENTS  
TO PUBLIC SERVICE COMPANY OF NEW HAMPSHIRE, INC.

Pursuant to 10 C.F.R., Section 2.740(b) and 2.741, the Intervenor State of New Hampshire requests that the attached Third Set of Interrogatories be answered fully in writing and under oath by any members of the Public Service Company of New Hampshire, Inc. ("Applicant") who have personal knowledge thereof. The answer to each Interrogatory should contain the name(s) and identification of the person(s) supplying the answer and whether or not he or she has verified the answer.

As used herein, the term "document" means all original writings of any nature whatsoever and all non-identical copies thereof in the possession, custody, or control of the Applicant and includes but is not limited to the following items: communications, correspondence, notes, field notes, studies, reports, summaries, instructions, charts, schedules, sketches and drawings, records, accounts and accounting records, opinions and reports of consultants.

As used herein, the term "identify" means:

1. In the case of a natural person:

- (a) name;
  - (b) last-known address;
  - (c) employer or business affiliation; and
  - (d) occupation and business position held.
2. In the case of a document:
- (a) identity of the person or persons preparing it;
  - (b) its title or a description of the general nature of the subject matter;
  - (c) the identity of the addressee;
  - (d) date of preparation;
  - (e) identity of persons who can identify it; and
  - (f) all of the aforementioned information should be supplied with such reasonable particularity as is sufficient for a specific demand for production. In lieu of the foregoing, a copy of the document may be supplied.
3. In the case of oral statements and communications:
- (a) when and where they were made;
  - (b) identify of each of the makers and recipients thereof;
  - (c) the medium of communication; and
  - (d) substance of the statement and/or communication.

Pursuant to 10 C.F.R., Section 2.740(e), responses should be supplemented under circumstances when new or different information becomes available. If the Applicant cannot answer the Interrogatories in full, so state and indicate when the Applicant expects to be able to answer the Interrogatory.

The State of New Hampshire further requests that the Applicant, pursuant to 10 C.F.R., Section 2.741, provide copies of or make available for inspection and copying the documents identified by the Applicant in response to certain of the accompanying Interrogatories within thirty (30) days after

service hereof. Production of such documents shall be at the offices of the Applicant in Manchester, New Hampshire, or a mutually convenient place.

INTERROGATORIES RELATED TO SPECIFIC CONTENTIONS

CONTENTION NH 9:

Radioactive Monitoring

The Seabrook design does not provide an adequate program for monitoring the release of radioactivity to the plant and its environs either under normal operating conditions or in pre- and post-accident circumstances. Thus, the application is not in compliance with general design criteria 63, 64 of Appendix A, 10 C.F.R. Part 50, and the requirements of NUREG-0737 and NUREG-0800.

Definition

The term radioactivity monitoring system as used in these Interrogatories means the instrumentation and displays and sampling capability for the monitoring of radioactivity within systems and areas of the plant including both operational and post-accident monitoring systems.

NH 9.46

Is the emergency operations facility equipped with necessary indicators to monitor containment conditions and releases of radioactivity from the plant? If the answer is yes, please indicate whether these indicators and associated circuitry meet Class 1E requirements.

NH 9.47

Some problems associated with the accelerated aging technique used in environmental qualification of Class 1E electrical equipment are discussed in the literature (W.W. Weaver, Aging Techniques and Qualified Life for Safety System Components, Nuclear

Safety, Vol. 21, P.51, January 1980)). If the Applicant is using this technique to qualify Class 1E instruments, such as the Manipulator Crane Monitors, the Containment Structure Monitors, the Plant Vent Monitors, and the Control Room Air Intake Monitors, please provide documentation as to how these problems (such as synergistic effects) have been resolved for each instrument tested.

CONTENTION NH 10

Control Room Design

The Seabrook Station control room design does not comply with General Design Criteria 19 through 22 and 10 C.F.R. Part 50, Appendix A, and NUREG-0737, Item I.D.1 and I.D.2.

NH 10.20

- (a) What are the critical plant variables and parameters which will be presented by the safety parameter display system (SPDS)? Explain how these variables were selected. Identify all documents which describe the basis on which parameters were selected.
- (b) Where will the SPDS be located?
- (c) Please provide a pictorial representation of the SPDS display.
- (d) Explain how the SPDS is designed to incorporate accepted human factor principles.



- (e) Does the Applicant intend to rely on the Preliminary Design Assessment or on the Detailed Control Room Design Review for licensing? Explain the basis of this decision.

CONTENTION NECNP I.B.1

The Applicant has not satisfied the requirements of General Design Criteria 4 and General Design Criteria 34 in that all systems required for residual heat removal, such as steam dump valves, turbine valves, and the entire steam dumping system are not safety grade and environmentally qualified.

NECNP I.B.1

Please provide design date and specifications of the steam generator of the Seabrook plant. Indicate whether the specifications have been modified or changed from the original version. If they have been modified, please specify the changes and the basis for them. Identify and produce, pursuant to 10 C.F.R., 2.741 all documents pertaining to any modifications in the specifications of the steam generator.

NECNP I.B.1.2

Please describe the chemical water treatment process used for the steam generator, identifying and producing all documents relating to this process pursuant to 10 C.F.R., 2.741.

NECNP I.B.1.3

Have any alternatives been or are any being considered to lessen the reliance on a single generator as the means of residual heat removal in the event of an accident? If so, please describe those alternatives. If not, please explain why no such consideration was undertaken.

NECNP I.B.1.4

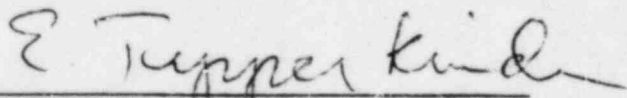
Please describe the efforts that have been or are being made to deal with the generic safety issue of tube rupture problems in steam generators of PWR plants. Please identify and produce pursuant to 10 C.F.R., 2.741 all documents relating to such an effort.

Respectfully submitted,

THE STATE OF NEW HAMPSHIRE

GREGORY H. SMITH  
ATTORNEY GENERAL

By



E. Tupper Kinder  
Assistant Attorney General  
Environmental Protection Div.  
Office of Attorney General  
State House Annex  
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Tel. (603) 271-3678

Dated: January 7, 1983

By George Dana Bisbee  
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Office of Attorney General  
State House Annex  
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Tel. (603) 271-3678

PUBLIC SERVICE COMPANY  
OF NEW HAMPSHIRE, INC.

Dated: \_\_\_\_\_ By \_\_\_\_\_  
Its \_\_\_\_\_

THE STATE OF NEW HAMPSHIRE  
HILLSBOROUGH, SS.

Personally appeared \_\_\_\_\_, before me,  
the undersigned officer, and made oath that the foregoing  
statements are true to his best knowledge and belief.

\_\_\_\_\_  
Notary Public/Justice of the  
Peace

Dated: \_\_\_\_\_

CERTIFICATE OF SERVICE

I, E. Tupper Kinder, Esquire, hereby certify that a copy of the foregoing State of New Hampshire's Third Set of Interrogatories and Request for Production of Documents to the Nuclear Regulatory Commission Staff and The State of New Hampshire's Third Set of Interrogatories and Request for Production of Documents to Public Service Company of New Hampshire, Inc. have been mailed this 7th day of January, 1983, by first class mail, postage prepaid, to:

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Atomic Safety and Licensing  
Board Panel  
U.S. NRC  
Washington, D.C. 20555

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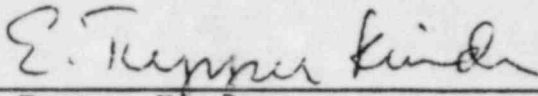
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E. Tupper Kinder

Dated: January 7, 1983