

6/4/83

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

APPLICATION OF TEXAS UTILITIES  
GENERATING COMPANY, ET AL. FOR  
AN OPERATING LICENSE FOR  
COMANCHE PEAK STEAM ELECTRIC  
STATION UNITS #1 AND #2  
(CPSES)

Docket Nos. 50-445  
and 50-446

CASE'S MOTION TO REOPEN RECORD  
REGARDING STEAM GENERATOR  
UPPER LATERAL RESTRAINT

Pursuant to 10 CFR 2.730, CASE (Citizens Association for Sound Energy), Intervenor herein, hereby files this, its Motion to Reopen Record Regarding Steam Generator Upper Lateral Restraint.

BACKGROUND

During the May 16-20, 1983 operating license proceedings, there were issues raised regarding the steam generator upper lateral restraint. (See especially tr. 6017-6092, 6173-6223, 6830-6858, 7037-7045.)

Following testimony by Applicants' witnesses and the introduction of Applicants Exhibit 157 (following tr. 6851), further concerns were briefly raised by CASE witness Jack Doyle (tr. 6857-6858). He was not allowed to thoroughly discuss those concerns at that time. However, the concerns which Mr. Doyle attempted to raise had to do with the new and potentially significant information contained in Applicants Exhibit 157 and the testimony regarding it by Applicants. This document indicated that, although snubbers apparently do exist, they are not on the upper lateral support (as promised by Applicants -- see tr. 6220/6-10); in actuality, they are 90 degrees to the direction on the lateral restraint beam.

The new information that the snubbers are 90 degrees from where they had been assumed to be and indicated to be by Applicants raises another potentially significant problem which CASE had no way of knowing about until Applicants provided their Exhibit 157. The problem is detailed in the attached affidavit of Jack Doyle. Briefly, as indicated in Mr. Doyle's affidavit, the potential problem has to do with thermal contraction, rather than thermal expansion.

As indicated by Mr. Doyle, CASE at this point does not have sufficient information to ascertain whether or not a problem exists in fact (although, based on the information we now have and Mr. Doyle's review of that information, there does appear to be a problem).

#### CASE'S MOTION

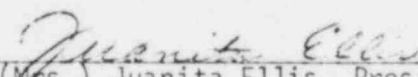
For the reasons set forth herein and in the attached affidavit of Jack Doyle, CASE moves that the Licensing Board:

- (1) Reopen the record in this regard;
- (2) Order Applicants to supply CASE with the information necessary to determine whether or not a problem in fact exists and the extent of the problem if there is one -- the information which it appears is necessary to make this determination is:
  - (a) Drawings, including dimensions and locations, of: the three support struts of the steam recirculating pump between the cross-over and the cold leg; the three vertical columns for the preceding; the four vertical columns (all double-pin ended) on the steam generator. (See Jack Doyle affidavit, page 2, lines 9-12.)
  - (b) The center-to-center dimensions of the steam generator and the recirculating pump. (See Jack Doyle affidavit, page 2, lines 13-14.)

- (c) Details regarding the temperature and temperature differential when the steam generator is shut down. (See Jack Doyle affidavit, page 1, lines 14-16, continued on page 2, lines 1-3.)
- (d) Any known information regarding the decrease in the relative dimension between the centers of the steam generator and the recirculating pump. (See Jack Doyle affidavit, page 1, line 16, continued on page 2, lines 1-3.)
- (3) Should Mr. Doyle ascertain that a problem does in fact exist, allow further testimony in this regard by Mr. Doyle, the Applicants, the NRC Staff, and the State of Texas.

CASE realizes that this is an unusual potential problem; however, this Licensing Board has indicated a strong desire to arrive at the truth regarding whether or not Comanche Peak has been constructed such that it can operate without endangering the health and safety of the public. This apparent commitment on the part of the Board is well supported in NRC regulations (see especially 10 CFR, Part 2, Appendix A, V.(g)(1)). CASE urges that this issue be explored to the extent indicated herein.

Respectfully submitted,

  
\_\_\_\_\_  
(Mrs.) Juanita Ellis, President  
CASE (Citizens Association for Sound Energy)  
1426 S. Polk  
Dallas, Texas 75224  
214/946-9446

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AFFIDAVIT OF JACK DOYLE

1 Q: Mr. Doyle, is there additional information which you believe is necessary  
2 to complete the record in these proceedings in regard to the steam generator  
3 upper lateral restraint?

4 A: Yes.

5 Q: Why do you believe it is necessary to reopen the record in regard to  
6 this matter?

7 A: From the information we had previously, we didn't know about this  
8 potential problem. We were looking at thermal expansion and now we're concerned  
9 with thermal contraction. We were working in one direction on a potential problem,  
10 and now it appears that the potential problem is actually in the opposite direction.

11 The steam generator is now locked in place in the hot position relative  
12 particularly to its own radial expansion and its interdependence on the recir-  
13 culating pump. From the information we have, the recirculating pump is locked  
14 in place relative to the steam generator. When they shut the generator down,  
15 it returns to 120° in about six hours or so (we don't have the exact information  
16 on this). The temperature differential would be about 500°, so the relative

1 dimension between the centers of the steam generator and the recirculating  
2 pump will decrease by some discrete dimension which we currently don't know.  
3 (It would probably be 3/4" to 1".)

4 With that upper lateral restraint as a rigid support, it will cause  
5 moment at the cross-over leg. So there could be a problem both with the cross-over  
6 leg and with the upper lateral restraint due to constraint of contraction.

7 Q: What specific information would you require to be able to make an analysis  
8 of this potential problem?

9 A: The support struts of the steam recirculating pump between the cross-  
10 over and the cold leg. There are three struts at 120° and there are also three  
11 vertical columns. And on the steam generator, there are four vertical columns,  
12 double-pin ended on all four columns. We need the drawings for all of those.  
13 And we also need the center-to-center dimensions of the steam generator and  
14 the recirculating pump.

I have read the foregoing two-page affidavit, which was prepared under my personal direction, and the thoughts and words expressed therein are my own thoughts and words. It is true and correct to the best of my knowledge and belief. Where questions were posed, they were posed by CASE.

\_\_\_\_\_  
Jack Doyle

DATE: \_\_\_\_\_

COUNTY OF \_\_\_\_\_

STATE OF MASSACHUSETTS

On this, the \_\_\_\_\_ day of June, 1982, personally appeared Jack Doyle, known to me to be the person whose name is subscribed to the foregoing instrument, and acknowledged to me that he executed the same for the purposes therein expressed.

Subscribed and sworn before me on the \_\_\_\_\_ day of June, 1983.

\_\_\_\_\_  
Notary Public in and for the  
County of \_\_\_\_\_, Massachusetts

My Commission Expires: \_\_\_\_\_

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CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of  
CASE'S MOTION TO REOPEN RECORD REGARDING STEAM GENERATOR UPPER LATERAL RESTRAINT

have been sent to the names listed below this 4TH day of June, 1983,  
by: Express Mail where indicated by \* and First Class Mail elsewhere.

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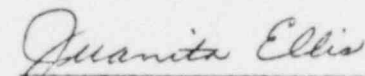


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