

U.S. NUCLEAR REGULATORY COMMISSION

ATOMIC SAFETY AND LICENSING BOARD

RE: Phila. Electric Nuclear Plant
Limerick - Units 1 and 2.

Docket # 50-352
DOCKETED
USNRC -353

RESPONSE BY R.L. ANTHONY AND FOE TO THE BOARD'S MEMORANDA AND ORDERS
OF SEPTEMBER 13 AND OCTOBER 5 AND CALLS FROM THE NRC ON 14 SEP 83, 7 and 12, 1983

OFFICE OF SECRETARY
DOCKETING & SERVICE

In its memorandum of Oct. 5 the Board said, "FOE should anticipate the likelihood that its request to defer the hearing beyond December 1983 will be denied given the insubstantial reasons it has advanced to date in support of its request."

We presume that the Board was referring to our request for more time to reword contentions as well as scheduling of hearings after the December holidays. We want the Board to understand that we will do our best to meet their preferences but there are obstacles for us which we will attempt to clarify.

In the first place we have never had any affidavit from Phila Electric that they actually know where the ARCO pipeline is located. Only on Sept 1. were we supplied by PECO with documents in discovery which included a letter of 6/7/79 from LeRoy A. Christman with ARCO's pipeline alignment sheet (we were not shown this sheet) in which he said in part, "...we deem the drawing to be approximate..... to determine the exact location either in a given area or overall, please advise and we shall make arrangements to stake the pipeline centerline for your survey crew to tie the line into your site plan"

There was no evidence that PECO has ever taken advantage of this offer. We must presume, therefore, that all the calculations in FSAR are based on an estimate of the pipeline's location. When I asked Mr. Wetterhahn in the conference call of 10/5 whom I should contact at PECO to ask for an affidavit to certify the exact location of the line, he said that he did not think anyone at PECO would make such a certification. I said that as far as I could see, PECO did not know whether the line was 800 feet from the #2 reactor enclosure or 900 or 500 feet or closer. We assert that the Board and we have a right to know the exact location and to have affidavits from Bechtel and PECO staff that they have seen the line or that it has been reliably marked and they show proof of the depth it is buried, also.

We request that the site visit referred to on Sept. 13 include an actual walk along the pipeline right of way where it approaches the plant and specific evidence of its location. Without proof at the site we cannot check PECO calculations on pressure from an explosion or heat impact, especially if the line is closer than they have assumed. Even accepting PECO's estimate of location their figures on the amount of fuel from a pipe rupture are off by 4 or 5 times since our study of the topographical map shows the pipe to be drained north of a break between 7,000 and 8,000 feet and south at least 1,000. PECO has figured only 2,000 feet, both north and south together.

We trust that the Board can see our predicament. We do not know how to reword our contentions until we know the exact location of the pipeline next to the plant and high points from which drainage would occur. If it turns out that PECO will have to re-estimate the results from a break, we will have to wait for their figures unless they accept ours. In short we will only have data on the scope of the pipeline problems after the plant visit and public hearings next week. Following these we will work as swiftly as possible but will be hard pressed to meet a written testimony deadline before late November.

October 12, 1983
Box 186 Moylan, Pa. 19065

Respectfully yours,

Robert L. Anthony

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