

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 FEB -9 AM 11:05

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETING SECTION
BRANCH

In the Matter of :
PHILADELPHIA ELECTRIC COMPANY : Docket Nos. 50-352
: 50-353
(Limerick Generating Station, :
Units 1 and 2) :

LEA'S ANSWERS TO APPLICANT'S FIRST SET OF INTER-
ROGATORIES RELATING TO CONTENTION I-42.

Limerick Ecology Action hereby responds to Applicant's Jan. 10, 1984 First Set of Interrogatories and Request for Production of Documents on Contention I-42., pursuant to the NRC Rules of Practice and Procedures, 10 CFR 2.740(b) and the Board's Order of Oct. 28, 1983. Please note that LEA was informed by Applicant's counsel that LEA was not expected to respond to a similar (but shorter) "Initial Interrogatory" Request dated Jan. 9, 1984, due to the fact that Applicant's First Set of Interrogatories covers the same material (per conversation with Mark Wetterhahn, 2/3/84). All answers have been prepared by Phyllis Zitzer, President of LEA, a full-time volunteer.

INTERROGATORIES

- 1). State whether or not LEA intends to present any expert witnesses on Contention I-42.

ANSWER: At the present time, LEA has no plans to present expert testimony on I-42.

2. State whether or not LEA intends to present any factual witnesses on the subject matter at issue in Contention I-42.

ANSWER: At the present time, LEA has no plans to present any factual witnesses on the subject matter at issue in Contention I-42.

3. Identify by title, author publisher, and date or issue, all documents that LEA relies upon as a basis for Contention I-42, or that LEA intends to use in presenting its direct case or in cross-examining other witnesses on Contention I-42, and identify

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all documents to which LEA intends to refer to in conducting cross-examination of other witnesses who may testify in connection with any such contention.

ANSWER: LEA is relying upon the documents listed as the "Basis" for this contention as discussed in its filings on Respecification of Contention I-42, dated 7/11/83, 8/9/83, and any subsequent material provided to LEA by the Applicant.

4. To the extent that your answer to any interrogatory is based upon one or more documents, (a) identify each such document on which your answer is based; (b) identify the specific information in such document upon which you rely; (c) explain how the information provides a basis for your answer.

ANSWER: See discussion under "Basis" section of LEA's filings on I-42, dated 7/11/83 and 8/9/83 as referenced above. Applicant's responses to City Interrogatories dated 2/3/84 may provide additional information.

5. To the extent that your answer is based upon any study, calculation, research or analysis, (a) describe the nature of the study, calculation, research or analysis and identify any documents which discuss or describe the study, calculation, research or analysis; (b) identify the person(s) or entity(ies) who performed the study, calculation, research or analysis; (c) describe in detail the information which was the subject of the study, calculation, research or analysis; (d) describe the results of such study, calculation, research or analysis; (e) explain how such study, calculation, research or analysis provides a basis for your answer.

ANSWER: Not applicable.

6. To the extent that your answer is based upon conversations, consultations or correspondence or other communications with one or more individuals or entities, please identify each such individual or entity; (b) state the educational and professional background of each such individual, including occupation and institutional affiliations; (c) describe the nature of each communication, including time and context, and describe the information received from each such individual or entity; (e) explain how such information provides a basis for your answer.

ANSWER: Not applicable.

7. To the extent that intervenor possesses information or documents expressing facts or opinions which are relevant to the specific interrogatories below, but which do not support intervenor's position or which have not otherwise been fully provided in the answers thereto, please provide such information and documents.

ANSWER: Not applicable.

8. Specify each system, component or part of the Limerick Generating Station which intervenor asserts is "important to safety" within the meaning of 10 C.F.R. §50.49(b) which has not been included in Appendix B of the Environmental Qualification Report ("EQR") for Limerick. As

to each such component or part, (a) describe in detail the component or parts and their exact location at the Limerick Generating Station; (b) identify the manufacturer, if known; (c) identify whether the component or part is asserted to be within the category "important to safety" because of its inclusion within 10 C.F.R. §50.49b(1)(2) or (3), describing in detail the reason for classification in one or more of these categories; (d) describe in detail the alleged "important to safety" function which the component or part will perform; (e) state the basis which the intervenor used in concluding that another system, component or part, or combination thereof, which is being qualified or which is not within a harsh environment cannot perform the function instead of the subject part or component; (f) state the basis, if any, upon which intervenor asserts that environmental qualification of such component or part will not or could not be performed prior to fuel loading for Limerick Unit 1 or 2, as appropriate; (d) the exact event or events for which intervenor asserts that the equipment must be qualified, the time or times after the initiation of the most critical event during which the part or component is asserted to be necessary to operate, and the exact environmental conditions which the component or part would experience.

ANSWER: Intervenors position is that PECO has not complied with the new expanded EQ rule, nor even attempted to conduct a thorough review of both safety-related and non-safety-related equipment to determine which equipment falls into category (b)(2) of the EQ Rule (10 CFR 50.49), since either might contain non-safety related components, the failure of which could prevent the satisfactory accomplishment of safety functions.

LEA is unable to provide a more detailed response until it receives answers to City Interrogatories on I-42 dated 2/3/84.

9. Identify any and all components or parts listed in Appendix B of the EQR which intervenor asserts will not be environmentally qualified by the time of fuel loading for each unit, giving the basis for such conclusion and stating when intervenor believes such part or equipment will be qualified, giving the basis for such conclusion or estimate.

ANSWER: LEA is unable to respond to this Interrogatory without receiving Applicant's answers to City Interrogatories on I-42, dated 2/3/84. It is also possible that LEA will not be able to provide a thorough answer to this question until it has had an opportunity to cross-examine PECO's witnesses on this contention.

10. With regard to each of the following parts, components, or systems which intervenor alleges should be included in the equipment qualification program, (1) feedwater control; (2) emergency lighting and communications systems; (3) plant process computer system; (4) computer software: (a) identify the exact systems, part or component involved, with reference to the description contained in the FSAR or P&I.D.'s, if possible; (b) identify the location or locations of the systems, parts or components at the Limerick Generating Station; (c) identify the conditions, e.g. LOCA or HELB; which intervenor asserts require that these systems be qualified; (d) identify the operations that such equipment would have to perform for such conditions and the time frame in which these actions are required; (e) identify the harsh environment that such equipment, part or component would experience; (f) state intervenor's understanding of systems, equipment, parts or components which can perform functions equivalent to those identified above and which are either being qualified or are not located in a harsh en-

12. As to each component or part for which intervenor asserts that an Equipment Qualification Review Record ("EQRR") has not been provided in Applicant's Environmental Qualification Report for Limerick, (a) specify each part or component allegedly omitted; (b) identify the exact location of such component or part; (c) identify the manufacturer, if known; (d) state the basis upon which intervenor relies to assert that such part or component should have been included in an EQRR.

ANSWER: LEA cannot respond until it is provided with answers to City Interrogatories on I-42, dated 2/3/84. Furthermore, LEA's concerns relate to the scope of search made by the Applicant to determine (b)(2) "important-to safety" equipment. LEA believes that it is the Applicant's responsibility to make a showing that its EQ program meets the new requirements of the 1/31/83 new EQ Rule.

13. As to each part or component for which intervenor asserts that the EQRR specifies a qualified life of less than 40 years, (a) specify the part or component; (b) identify the manufacturer, if known; (c) the corrective action which intervenor asserts should be taken by Applicant to correct the alleged deficiency, the basis upon which the means for identification of such items by Applicant as discussed on page 8.2 of the Environmental Qualification Report is insufficient to meet NRC requirements.

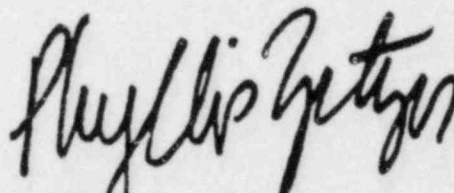
ANSWER: LEA's position is that no action is identified to correct noted deficiencies where life of qualified equipment does not equal the 40 year plant life. (See EQRRs, pp. 8,32-35) LEA intends to cross-examine Applicant's witnesses to determine whether or not NRC requirements have been satisfied.

14. State intervenor's basis for the assertion that the key switch in the control room for the standby liquid control system is in a harsh environment and thus subject to

LEA has relied solely upon documents provided by the Applicant.

I hereby affirm that the above answers are true and correct to the best of my knowledge.

Feb. 6, 1984


LEA President

CERTIFICATE OF SERVICE

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I hereby certify that LEA's Responses to Applicant's First Set of Interrogatories relating to Contention I-42 have been served upon the following by first class mail, postage prepaid on Feb. 6, 1984.

Lawrence Brenner, Chairman (2)
Administrative Judge
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Dr. Richard F. Cole
Administrative Judge
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Dr. Peter A. Morris
Administrative Judge
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Docketing and Service Section
Office of the Secretary
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety and
Licensing Board Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Atomic Safety and
Licensing Appeal Panel
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Ann P. Hodgdon, Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Benjamin Vogler, Esq.
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Troy B. Conner, Jr., Esq.
Conner and Wetterhahn
1747 Pennsylvania Ave., NW
Washington, DC 20006

Philadelphia Electric Company
Attn: Edward G. Bauer, Jr.
VP and General Counsel
2301 Market St.
Phila., PA 19101

Thomas Gerusky, Director
Bureau of Radiation Protection, DER
5th fl, Fulton Bank Bldg.
Third and Locust Sts.
Harrisburg, PA 17120

Spence W. Perry, Esq.
Associate General Counsel
FEMA
Room 840
500 C St., SW
Washington, DC 20472

Zori Ferkin, Esq.
Governor's Energy Council
P.O. Box 8010
1625 Front St.
Harrisburg, PA 17105

Jay M. Gutierrez, Esq.
U.S. Nuclear Regulatory Commission
Region 1
631 Park Ave.
King of Prussia, PA 19406

Director, PEMA
Basement, Transportation
and Safety Building
Harrisburg, PA 17120

Angus Love, Esq./Montg. Co. (Legal Aid)
107 East Main St.
Norristown, PA 19401

Robert Anthony
103 Vernon Lane
Moylan, PA 19065

Martha W. Bush, Esq.
Kathryn S. Lewis, Esq.
Solicitor's Office
City of Philadelphia
Municipal Services Building
Phila., PA 19107

Steven Hershey, Esq.
community Legal Services
5219 Chestnut St.
Phila., PA 19139

Marvin I. Lewis
6504 Bradford Terrace
Phila., PA 19149

Frank Romano
61 Forest Ave.
Ambler, PA 19002

Joseph H. White, III
15 Ardmore Ave.
Ardmore, PA 19003

Robert Sugarman, Esq.
Sugarman and Denworth
Suite 510
North American Building
121 S. Broad St.
Phila., PA 19107

David Wersan, Esq.
Assistant Consumer Advocate
Office of the Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

Gregory C. Minor
MHB Technical Associates
1723 Hamilton Ave.
San Jose, CA. 95125

February 6. 1984

Phyllis Zitzer
PHYLLIS ZITZER