

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND LICENSING BOARD  
BEFORE ADMINISTRATIVE JUDGES

Lawrence Brenner, Chairman  
Dr. Richard F. Cole  
Dr. Peter A. Morris



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

CITY OF PHILADELPHIA'S RESPONSES  
TO PECO'S I-42 INTERROGATORIES

1. State whether the City intends to present any expert witnesses on the subject matter at issue in Contention I-42, as stated in Limerick Ecology Action's letter dated July 11, 1983 and admitted by the Licensing Board in its Memorandum and Order dated October 28, 1983 (slip op. at 2). If so, identify each expert witness and state (1) his professional qualifications; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is expected to testify; (d) the grounds for each opinion. Identify by court, agency or other body, each proceeding in which such individual rendered testimony on this subject.

A. At this time the City has no intent to present any expert witnesses on the subject matter at issue in Contention I-42.

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2. State whether the City intends to present any factual witnesses on the subject matter at issue in Contention I-42. If so, identify each such factual witness and further state (a) his professional qualifications; (b) the subject matter on which the witness is expected to testify; (c) the substance of the facts to which the witness is expected to testify. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this subject(s).

A. No.

3. Identify by title, author, publisher and date of issuance or publication, all documents that the City relies upon as a basis for contentions or that the City intends to use (by way of reference or evidentiary proffer) in presenting its direct case in cross-examining other witnesses on Contention I-42 and all documents to which the City intends to refer in conducting cross-examination of other witnesses who may testify in connection with any such contention.

A. The City did not draft the contention and therefore relied upon no document for the basis for the contention. Material used in cross-examination by an attorney is privileged. The material that is currently in the possession of the City that touches on the subject of the adequacy of PECO's environmental qualification of equipment is as follows:

10 CFR 50, January 21, 1983, 48 Fed. Reg. 2729.

Amendment 51 to Licensing Application, May 24, 1983 and October Supplement.

Limerick FSAR.

EQRR Reference List.

Responses to Request for Additional Information of December 19, 1983.

Philadelphia Electric Company Q\*5 Component Classification Program Rules.

Discovery 27, February 21, 1984.

Board Notification of January 18, 1984, Subject: NRC Use of the Terms,

"Important to Safety" and "Safety Related" (Board Notification 84-011).

Board Notification of January 12, 1984, Subject: Environmental Qualification:

Commission Meeting with Sandia and NRC Staff on January 6, 1984 (Board Notification 87-007).

Board Notification of January 5, 1984, Subject: Environmental Qualification

Briefing of Chairman by Sandia (Board Notification 84-004).

Board Notification of February 13, 1984, Subject: Additional Information

on Environmental Qualification (Board Notification 84-032).

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.

A. The information requested is contained in the analysis, studies and principal documents referenced in answer to Interrogatory 3.

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 provides a basis for your answer.

A. The information requested is contained in the analyses, studies and principal documents referenced in answer to Interrogatory 3.

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.

A. The information requested is contained in the analyses, studies and principal documents referenced in the answer to Interrogatory 3.

7. To the extent that the City 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.

A. The City possesses no such information or documents.

8. Specify each system, component or party of the Limerick Generating Station which the City 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. Your response to this and subsequent interrogatories should consider the revisions made to that document transmitted to the NRC (Mr. A. Schwencer) by Philadelphia Electric Company (John S. Kemper) on January 16, 1984, including the revised Appendix B. 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 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 City 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 the City

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 the City 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.

A. The City has not done an environmental qualification review for Limerick. The burden is upon the applicant for an operating license to do such a review, and, since January 31, 1983, there has been a burden upon such applicants to undertake a review of equipment that is not safety-related but that is important-to-safety to consider its inclusion in an environmental qualification program. As far as the City can tell, no systematic review specifically for the purpose of identifying structures, systems and components important to safety but not safety-related has been done by PECO. See Discovery 27, Nos. 14 and 15 Rules.

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

A. At this time the City is aware of no such specific components or parts. However, see response to No. 8.



10. With regard to each of the following parts, components, or systems which intervenor LEA 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, to the extent the City agrees with LEA that such equipment must be included in the environmental qualification program; (1) 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 the City 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 the City'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 environment and state why this other system, equipment, part or component is not sufficient to perform the intended function.

A. This City takes no position on this issue at this time.

11. As to each "human interaction problem" which the City asserts should be addressed by Applicant in its Environmental Qualification Report for Limerick, if any: (a) specify what is meant by the term "human interaction problem"; (b) identify the exact location of such component or part; (c) specify each

component or part which the City alleges should be the subject of such a "human interaction review"; (d) identify the manufacturer of the part or component, if known; (e) specify the "important to safety" function which requires analysis of human interaction with regard to the particular part or component; (f) state the specific basis in NRC regulations or regulatory guidance for performing such a review, including goals, methodology, experimental work, studies, data analysis techniques and basis for evaluating the results which the City asserts is necessary.

A. The City takes no position on this issue at this time.

12. As to each component or part for which the City 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.

A. The City has not developed a list of components or parts for which an Equipment Qualification Review Record should be made.

13. As to each part or component for which the City asserts that the EQRR specifies a qualified life of less than 40 year, (a) specify the part or



component; (b) identify the manufacturer, if known; (c) the corrective action which the 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.

A. The City has not made an environmental qualification review for Limerick or a review of qualified equipment that does not equal the 40 year plant life, but believes that equipment that is qualified and that has a life less than 40 years should be identified so that replacements can be made at the end of the equipment is qualified life.

14. State the City's basis, if any, for the assertion that the key switch in the control room for the standby liquid control system is in harsh environment and thus subject to qualification pursuant to NRC requirements.

A. The City has made no such assertion. The City believes this equipment has an importance to safety that must be evaluated to determine whether it should be qualified.

15. State what electrical equipment in the PASS system, if any, the City asserts must be qualified; specify how failure in such electrical equipment could mislead the operator.

A. The City has made no such assertion. However, the PASS System will be used to assess accidental conditions. Therefore electrical equipment used to control and monitor its operations should be reviewed to determine whether it should be included in the equipment qualification program.

16. Identify each and every way which the document, Philadelphia Electric Company Q\*5 Component Classification Program Rules fails to provide a methodology for assuring that equipment, parts or components falling in the definition of 10 C.F.R. §5049(b) are not properly identified. The response to this interrogatory may contain proprietary material; if so, it should be sent only to Applicant's counsel in Washington, D.C.

A. Provided to Applicant's counsel and LEA's counsel.

16. Page 9-1 of this document appears to limit its review to Class 1-E electrical components. These are safety-related, not non-safety related but important-to-safety components.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
ATOMIC SAFETY AND HEALTH BOARD  
BEFORE ADMINISTRATIVE JUDGES



Lawrence G. Brennan, Chairman  
U.S. District Ct. 1984  
U.S. District Ct. 1984

In the Matter of

United States of America  
vs. [illegible]

NUCLEAR REGULATORY COMMISSION

Administrative Proceedings No. [illegible]  
[illegible]

EXHIBIT A

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