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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	Docket Nos. 50-250 OLA
Florida Power & Light Co.	)	50-251 OLA
Turkey Point Units 3 and 4	)	

INTERVENORS' RESPONSE TO INTERROGATORIES  
PROPOUNDED BY FLORIDA POWER & LIGHT COMPANY

Pursuant to 10 C.F.R. § 2.740 (b), and the Licensing Board's Prehearing Conference Order of May 16, 1984, Intervenor's present the following responses to the interrogatories propounded by the Florida Power & Light Company.

Responses were prepared by Joette Lorion under the supervision of her attorney, Martin H. Hodder. Intervenor's understand that the interrogatories are a continuing obligation and will provide additional information when it comes to Intervenor's attention.

Contention b

b-1 Witness selection hasn't been presently determined. Pursuant to rule 10 C.F.R. § 2.740 (b), Intervenor's will keep the Board and parties posted.

DS03

b-2 Not applicable.

b-3 The reports and papers that Intervenors intend to rely upon in presenting the case on contention b are as follows:

"Acceptance Criteria for Emergency Core Cooling Systems for Light Water Nuclear Power Reactors," 10 C.F.R. 50.46 and Appendix K of 10 C.F.R. 50.46, FR Volume 39, Number 2, January 4, 1974.

Demastry (FPL) to Eisenhutt (NRC), "Additional Analyses (LOCA with Ungridded BART Model) For F H/ BART Technical Specification Amendment," September 20, 1983.

D. McDonald (NRC) letter to Uhrig (FPL), "Technical Specification Amendments to Support the Integrated Program for Vessel Flux Reduction and Operation with the New Steam Generators," December 23, 1983.

WCAP-9561, "BART-A1 : A Computer Code for Best Estimate Analysis of Reflood Transients." Accepted by letter dated December 21, 1983, C.O. Thomas (NRC) to E.P. Rahe (Westinghouse).

WCAP-9561; "BART-A1 : A Computer Code for Best Estimate Analysis of Reflood Transients," January, 1980.

Uhrig (FPL) letter to Eisenhut (NRC), "Proposed License Amendment Optimized Fuel Assembly and Wet Annular Burnable Absorber Rods," June 3, 1983.

48 Federal Register, 45862, October 7, 1984.

NRC Report on Pressurized Thermal Shock, Nov. 1982.

b-4 The above would also be employed in cross examination.

b-5 Documents prepared by the NRC and Licensee that we contend are deficient are:

McDonald (NRC) letter to Uhrig (FPL), "Technical Specification Amendments to Support Program for Vessel Flux Reduction," December 23, 1983.

Thomas (NRC) letter to Rahe (west), "Application for Referencing of Licensing Topical Report WCAP-9561, BART A.1: A Computer Code for Best Estimate Analysis of Reflood Transients," Dec. 21, 1983.

They are deficient in that the approved reflood rate is not in conformance with safe power reactor operation.

b-6 "The entirely new computer model referred to in contention b is the BART-A1 Model, WCAP-9561.

b-7 Yes, current acceptance of the ECCS evaluation model employing the new computer code is only conditional.

b-8 The statement that reflood rates are critical if below 1 or two inches per minute was composed by the Center's then technical advisor, Robert B. Pollard of the Union of Concerned Scientists, Washington, D.C., who was given the technical documents listed in B-3. Other documents used are unknown.

b-9 Yes, Intervenor's contend that the use of "the entirely new computer model" results in failure to meet the ECCS acceptance criteria of 10 C.F.R. § 50.46.

b-10 The criteria which will not be satisfied at Turkey Point are: 10 C.F.R. 50.46 (c) and (d), and 10 C.F.R. Appendix A, Part 35, and 10 C.F.R. Appendix K, D.3 and D.5.

#### Contention d

d-1 Witness selection hasn't been presently determined. Pursuant to rule 10 C.F.R. § 2.740 (b) Intervenor's will keep the Board and parties posted.

d-2 Not applicable.

d-3 The reports and papers that intervenor's intend to employ or rely upon in presenting their case on contention d are:

McDonald (NRC) letter to Uhrig (FPL), "Technical Specification Amendments to Support Program for Vessel Flux Reduction and Operation with New Steam Generators, Dec. 23, 1983.

Uhrig (FPL) letter L-83-344 to Eisenhut (NRC), "Turkey Point Units 3 and 4, Docket nos. 50-250, 50-251, Proposed License Amendment F H/ F<sub>Q</sub> , Sept. 9, 1983.

Uhrig (FPL) letter L-83-507 to Eisenhut (NRC), "Clarification to F H/ F<sub>Q</sub> Technical Specification Changes," October 4, 1983.

Thomas (NRC) letter to Rahe (West), "Application for Referencing of licensing Topical Report WCAP-9561, "BART A1: A Computer Code for Best Estimate Analysis of Reflood Transients, Dec. 21, 1983.

McDonald (NRC) letter to Uhrig (FPL), "Amendments No. 98 and No. 92 to Facility Operating License for Turkey Point Units 3 and 4, December 9, 1983.

"Acceptance Criteria for Emergency Cooling Systems for Light Water Cooled Nuclear Power Reactors," 10 C.F.R. 50.46 and Appendix K or 10 C.F.R. 50.46, Federal Register, Volume 39, No. 2, January 4, 1974.

Uhrig (FPL) letter to Eisenhut (NRC), "Optimized Fuel Assembly and Wet Annular Burnable Absorber Rods," June 3, 1983.

NRC Staff Report on Pressurized Thermal Shock, Nov. 1982.

d-4 The above documents would also apply to Intervenor cross examination.

d-5 Documents prepared by the NRC and Licensee that we contend are deficient are:

McDonald (NRC) letter to Uhrig (FPL), "Technical Specification Amendments to Support Program for Vessel Flux Reduction," December 23, 1983.

Thomas (NRC) letter to Rahe (West.), "Application for Referencing of Licensing Topical Report WCAP-9561, BART A.1: A Computer Code for Best Estimate Analysis of Reflood Transients," Dec. 21, 1983.

They are deficient in that the approved DNBR is not in conformance with safe power reactor operation.

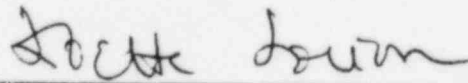
d-6 The statement that "If the minimum allowable DNBR is reduced from 1.3 to 1.7 as proposed, this would authorize operation of the fuel much closer to the upper boundary of the nucleate boiling regime," was composed by the Center's then technical expert, Robert B. Pollard of the Union of Concerned Scientists in Washington D.C. Robert Pollard utilized the technical documents described in d-3. Any other documents that may have been utilized are presently unknown.

d-7 Yes, Petitioners contend that the "proposed decrease in the departure in the nucleate boiling ratio" would result in failure to meet the ECCS acceptance criteria of 10 C.F.R. 50.46.

d-8 The criteria that Intervenor's contend will not be met at Turkey Point are 10 C.F.R 50.46 (b) (1) and Appendix K (c) (4).

These interrogatories were prepared and signed by Joette Lorion in the absence of her attorney, Martin Hodder, because of mailing constraints.

Respectfully Submitted,



Joette Lorion

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Dated: July 10, 1984

State Of Florida )

County of Dade )

I, JOETTE LORION, being first duly sworn, do depose and say that the following is true and correct to the best of my knowledge, information and belief.

Joette Lorion

Joette Lorion

Sworn and subscribed before me this 10 day of July  
1984.

Beverly Major Jones  
Notary Public

State of Florida

NOTARY PUBLIC STATE OF FLORIDA  
MY COMMISSION EXP. MAY 28, 1985  
BONDED THRU GENERAL INS. UND.

My Commission Expires:



UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
Florida Power & Light Company )  
Turkey Point Units #3 and #4 )

Docket Nos. 50-250<sup>84</sup> OLA  
50-251 OLA

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CERTIFICATE OF SERVICE

I hereby certify that copies of the "Intervenors' Response to Interrogatories Propounded By Florida Power & Light Company" have been served on the following parties by deposit in the United States Mail, first class, this 10 th day of July, 1984.

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Martin H. Hodder  
Attorney for Center for  
Nuclear Responsibility  
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\* For Martin Hodder