

UNITED STATES OF AMERICA '84 MAY 21 AIO:15  
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
DOCKETING & SERVICE  
BRANCH

In the Matter of )

) )  
CAROLINA POWER & LIGHT COMPANY )  
AND NORTH CAROLINA EASTERN )  
MUNICIPAL POWER AGENCY )Docket Nos. 50-400 OL  
50-401 OL) )  
(Shearon Harris Nuclear Power Plant, )  
Units 1 & 2) )APPLICANTS' STATEMENT OF MATERIAL FACT  
AS TO WHICH THERE IS NO GENUINE ISSUE  
TO BE HEARD ON EDDLEMAN CONTENTION 45

Pursuant to 10 C.F.R. §2.749(a), Applicants state, in support of their Motion for Summary Disposition of Eddleman Contention 45, that there is no genuine issue to be heard with respect to the following material facts:

1. Eddleman Contention 45 states that SHNPP design cannot comply with the results of the Plant Water Hammer Experience Report, PWR S.G. (steam generator), feedwater, ECCS & Main Steam System water hammer events evaluation (including systems effect) and potential resolutions now being prepared by NRC, and the CR and NUREG reports on the waterhammer question. See Applicants' Motion for Codification of Admitted Contentions, dated December 17, 1982, Appendix A, approved in Memorandum and Order (Addressing Applicants' Motion for Codification), dated January 17, 1983.

2. The NRC Staff has concluded that water hammer in nuclear power plants is not as significant a safety issue as was once thought. Evaluation of Water Hammer Occurrence in Nuclear Power Plants, Technical Findings Relevant to Unresolved Safety Issue A-1, NUREG-0927, Revision 1, March 1984 at 1-4.

3. The NRC has found that of the reported incidents of water hammer in nuclear plants in the United States, none of the events placed a plant in a faulted or emergency condition and none resulted in a radioactive release. Id. at 1-5.

4. Water hammers continue to occur but at low frequency. Id. at 1-5.

5. It is not feasible to totally eliminate water hammer because of conditions inherent in the design and operation of nuclear plant systems. Id. at 1-5.

6. The incidence of water hammer in nuclear plants has declined considerably in recent years due to the implementation of various design and operational modifications. Id. at 1-6.

7. Boiling water reactors (BWR's) have a higher incidence of water hammer events than PWR's. Id. at 1-6.

8. The frequency and severity of water hammers can be significantly reduced through proper design features. Id. at 1-6.

9. The NRC Staff has not recommended that design modifications relative to water hammer be required for existing nuclear plants or plants under construction. See Regulatory Analyses of USI A-1, "Water Hammer", NUREG-0993, Revision 1, March 1984 at 4.

10. The steam generators used in the Shearon Harris plant are the Westinghouse Model D-4 preheat type. Carlson affidavit at ¶ 15.

11. The Shearon Harris steam generators have been designed to minimize the potential and consequences of water hammer in the steam generators. See Carlson affidavit at ¶¶ 17, 23, 24, 29, 39, 31, 32.

12. The Harris plant main feedwater system, the auxiliary feedwater system and the feedwater bypass system have been designed to minimize the potential and consequences of water hammer in those systems. See Carlson affidavit at ¶ 34, 35, 36, 38-45; Shah affidavit at ¶ 13, 14, 16 and 17.

13. The Harris plant ECCS system has been designed to minimize the potential

and consequences of water hammer in that system. Carloson affidavit at ¶ 46\_51; Shah affidavit at ¶ 18.

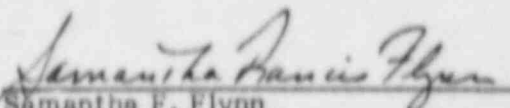
14. The Harris plant main steam system has been designed to minimize the potential and consequences of water hammer in that system. Shah affidavit at ¶ 9 and 10.

15. Applicants' Initial Test Program for the Harris plant is adequate to ensure that the ECCS, main steam, feedwater systems and their components will perform in accordance with their design bases, including those relevant to water hammer and to detect any design deficiencies that might exist. See affidavit of C. S. Hinnant.

16. Applicants will verify that the ECCS, main steam, feedwater systems have been constructed in accordance with design documents. Affidavit of Roland M. Parsons and affidavit of David C. McCarthy.

17. Applicants will operate the Harris plant in accordance with the Westinghouse split feedwater delivery criteria specified in the affidavit of Robert W. Carlson unless those criteria are modified by future vendor recommendation. Affidavit of Joseph M. Collins.

Respectfully submitted,

  
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Dated: May 25, 1984