

657

LEGAL ENVIRONMENTAL ASSISTANCE FOUNDATION (LEAF)

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July 26, 1984

Morton B. Margulies, Esquire, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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Mr. Gustave A. Linenberger, Jr.
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
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Dr. Oscar H. Paris
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
Georgia Power Company, et al.
(Vogtle Electric Generating Plant, Units 1 and 2)
Docket Nos. 50-424 and 50-425 (OL)

Dear Sirs:

Upon reviewing the Westinghouse proprietary report regarding Applicant's modification of the primary loop system in VEGP, Campaign for a Prosperous Georgia hereby withdraws CPG-9.

Applicant has furnished us with supplementary information regarding CPG-10 as well. Because the majority of our environmental qualification concerns were not addressed in this supplement, we stand on CPG-10 as previously submitted. For example, Applicant did not address our concerns regarding use of integrated dose rates, nor did it discuss synergistic effects of oxygen concentration. We are also concerned that Applicant has undertaken dry heat tests only, whereas accident conditions most often involve steam or higher humidity. FSAR Table 3.11.B.3-1 (Sheet 11). This omission is significant as most materials degrade more quickly in a humid environment. Regarding the hydrogen recombiners, though the unit's components have been tested, the unit as a whole remains untested. We were unable to review the Post-Irradiation Test Program for the recombiners as this information was excluded as proprietary material.

As Applicant has already undertaken the necessary steps to procure new motors to replace those Limitorque Motor Operators which failed earlier environmental qualification tests, we will not raise this issue in future proceedings. Likewise, as Applicant's affiant states that there are no terminal blocks in safety related applications inside the Vogtle containment and those outside containment that are necessary for accident mitigation will not be

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exposed to a steam environment. we will not pursue the issue of environmental qualifications of terminal blocks in future proceedings.

Sincerely,

Laurie Fowler
LEAF General Counsel

cc: Service List