

522
RELATED CORRESPONDENCE

SUFFOLK COUNTY
NEW YORK STATE
2/08/85

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'85 FEB 11 AM 11:31

Before the Atomic Safety and Licensing Board

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))

Docket No. 50-322-OL

SUFFOLK COUNTY AND NEW YORK STATE
JOINT MOTION TO STRIKE STAFF TESTIMONY

Suffolk County and the State of New York hereby move to
strike the following portions of the Joint Testimony of Spencer H.
Bush, Adam J. Henriksen, and Professor Arthur Sarsten:

1. Page 5 - first sentence
2. Page 5 - second paragraph (except first sentence) and third full paragraph
3. Page 12 - A8, last two sentences
4. Page 14 - Q and A 10
5. Pages 14-21 - Q and A 11
6. Page 21 - A13, sentence beginning "I believe"
7. Pages 21-22 - Q and A 14
8. Page 22 - Q and A 15
9. Page 23 - A16, second sentence, after "this limit" thru "cycles, and"

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This material presents new testimony, principally by Dr. Bush, on the ability of the crankshafts to operate safely at or above an instrument-indicated load of 3500 kW and higher.^{1/}

This testimony is outside the scope of the forthcoming hearing. Issues concerning the adequacy of the crankshafts at and above the then rated full load of 3500 kW have been previously fully litigated and the record thereon has been closed. The Board's Order of December 4, 1984 (the "Order") reopened the record on crankshafts for the purpose of litigating the acceptability of crankshafts and cylinder blocks on the basis of the reduced "qualified load" of 3300 kW, and to permit evidence of new strain gage data on the blocks. See Order at 3.

The Board limited the scope of the reopening to evidence concerning calculations on crankshaft stresses under DEMA and enumerated classification societies at a qualified load (below the previous rated load of 3500 kW) and regarding the results of testing and inspections of the crankshaft and block after completion of the qualification test on EDG 103, purportedly at the new qualified load of 3300 kW. Order at 5. The Board also permitted the submission of a contention challenging the appropriateness of that new qualified load.

The Staff's testimony which we move to strike does not fall within the scope of evidence permitted by the Board. It does not consist of the specified calculations, nor does it deal with the results of the tests and inspections of the crankshaft referred to

^{1/} Some of this testimony refers to a load of 3430 kW, in order to account conservatively for instrument error.

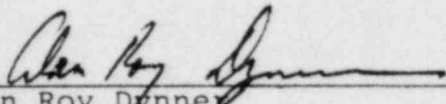
in the Order. On the contrary, the testimony addresses the ability of the crankshafts to survive operation at indicated loads of 3500 kW and higher.

Moreover, the testimony is based upon data which was available to the Staff before the record was closed on the crankshaft litigation and includes analyses by Dr. Bush which could have been performed before that record was closed. Specifically, the testimony relies on the operation of EDG 103 for over 220 hours at indicated loads of 3500 kW or more. See, e.g., testimony referred to in items 3 and 5 above.

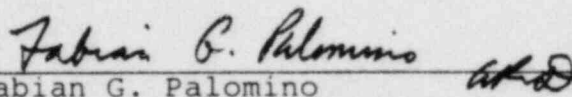
Clothing this testimony in the guise of a response to the EDG Load Contention does not bring it within the scope of the forthcoming hearing. The fact remains that the testimony addresses an issue -- the adequacy of the crankshafts during EDG operation at or above 3500 kW -- which has been fully litigated and as to which the record is closed. That record is clear as to the Staff's position both as to unlimited life and as to overload operation for only short periods. In both cases the Staff's witnesses (Professor Sarsten, Mr. Henriksen, and Dr. Bush) testified that they could only have confidence in the adequacy of the crankshafts if they were operated 10^7 cycles at the particular load or met classification society rules. The forthcoming hearing may not properly be used as a forum to re-litigate these issues.

Respectfully submitted,

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February 8, 1985

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CERTIFICATE OF SERVICE

I hereby certify that copies of SUFFOLK COUNTY AND NEW YORK STATE JOINT MOTION TO STRIKE STAFF TESTIMONY, dated February 8, 1985, have been served on the following this 8th day of February 1985 by U.S. mail, first class, except as otherwise indicated.

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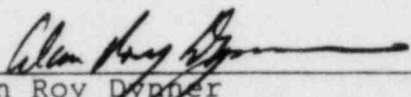
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