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USNRCUNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

GEORGIA POWER COMPANY
et al.(Vogtle Electric Generating Plant,
Units 1 and 2)Docket Nos. 50-424
50-425
(OL)STAFF'S RESPONSE TO APPLICANTS' MOTION
FOR SUMMARY DISPOSITION OF JOINT INTERVENORS'
CONTENTION 10.7 (HYDROGEN RECOMBINERS)I. INTRODUCTION

By Motion dated July 18, 1985, Applicants have moved, pursuant to 10 CFR § 2.749, for summary disposition of Joint Intervenor's Contention 10.7 relating to the environmental qualification of hydrogen recombiners. Staff supports this motion on grounds that Applicants have demonstrated the absence of any issue of material fact regarding this issue, and that they are therefore entitled to a favorable decision as a matter of law.

In support of our response, Staff relies upon the Affidavits, submitted herewith, of Hukam D. Garg and Chang-Yang Li. In order to avoid unnecessary repetition, Staff's discussion in its July 26, 1985 response to Applicants' motion for summary disposition of Joint Intervenor's Contention 10.3 concerning the legal principles governing summary disposition is incorporated by reference herein.

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II. BACKGROUND

As originally submitted, Joint Intervenors' Contention 10.7 stated that:

Applicant has not shown that safety-related electrical and mechanical equipment and components will be environmentally qualified at the onset of operations and throughout the life of the plant as required by General Design Criteria 1, 2 and 4 of 10 C.F.R. 50, Appendix A and other applicable NRC rules.

The parties later agreed to the breakdown of the contention into eleven subcontentions. That portion concerning the environmental qualification of hydrogen recombiners was designated as Contention 10.7. See Georgia Power Co. (Vogtle Units 1 & 2), LBP-84-35, 20 NRC 887, 903, 905 (1984).

Joint Intervenors' main concerns in Contention 10.7 are that: (1) a hydrogen recombiner manufactured by Rockwell International had pressure transducers that failed certain environmental tests and (2) that the Westinghouse hydrogen recombiners used at Vogtle had not been tested for the effects of radiation. Gane and CPG April 11, 1984 Supplements at 24. In opposition to this contention, the Applicants responded that Vogtle will not use Rockwell International hydrogen recombiners (May 7, 1984 Response at 69) and that its Westinghouse hydrogen recombiners did not have pressure transducers (June 27, 1984 Ramsey Affidavit at ¶ 6).

Contention 10.7 was admitted by the Board in its Order of September 5, 1984. Supra, 20 NRC at 905. The Board conceded that the information provided by Applicants may have rendered portions of this contention moot. However, it held that the following further inquiry is necessary:

Are there any types of transducers or sensors important to the proper functioning of the Vogtle electric-type

hydrogen recombiner in an accident environment that require environmental qualification testing in an accident environment; if so, what testing is planned or completed and with what results?

If environmental qualification testing in an accident environment of an entire prototype recombiner is not required, what is the basis for this conclusion? If such testing is planned or has been completed, what is the nature of the test and what criteria exist for assessing the adequacy of the test results?

Id. at 906.

On July 18, 1985 the Applicants filed their present motion, supported by affidavits of Glenn H. Stolz and Richard B. Miller, requesting summary disposition of Contention 10.7.

III. DISCUSSION

To ensure hydrogen concentration inside containment remains at low levels following a design basis accident, each Vogtle unit will utilize two Westinghouse Model B electric hydrogen recombiner systems. These systems consist of a recombination unit located inside of containment and a power supply panel and a control panel outside of containment. Yi Affidavit at ¶ 3.

Unlike the Rockwell International hydrogen recombiners cited by Joint Intervenors, Westinghouse Model B hydrogen recombiners are not equipped with any transducers or sensors located in a harsh environment inside containment. Id. The Westinghouse recombiners are manually actuated in accordance with emergency operating procedures. Id. Sensors and transducers are not required for hydrogen monitoring inside containment since the Vogtle hydrogen monitoring system is located outside

containment and receives samples by a piping system through the wall of the containment building. Id. at ¶ 4.

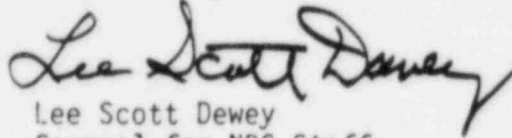
Environmental qualification of the Vogtle hydrogen recombiners has been established by various tests performed by Westinghouse for Model A and B recombiners. Garg Affidavit at ¶¶ 5-6. Westinghouse's Model A environmental testing previously has been approved by Staff on several occasions. Id. at ¶ 5. The Model B test program environmentally qualifies those features of Model B which differ from Model A. Id. at 6. NRC regulations allow testing of similar equipment to show that the equipment to be qualified is acceptable. See 10 CFR 50.49(f). Staff's recent review of the Model B program establishes that the differences between Model A and Model B are minor, and that those features of Model B which differ from Model A have been adequately environmentally qualified. Garg Affidavit at ¶ 6.

IV. CONCLUSION

In summary, the information outlined above, submitted in response to the Board's inquiry, establishes that: (1) unlike the Rockwell International recombiners upon which Intervenor's rely for their contention, there are no transducers or sensors located in an accident environment in the Vogtle containment which are important to the proper functioning of the Vogtle hydrogen recombiners; and (2) there are no open issues regarding the environmental qualification of the Vogtle hydrogen recombiners since this qualification has already been performed by Westinghouse and been approved by the NRC Staff.

Under these circumstances, there is no dispute as to any material fact concerning Joint Intervenors' Contention 10.7 and Applicants' motion for summary disposition should be granted.

Respectfully submitted,

A handwritten signature in cursive script, reading "Lee Scott Dewey". The signature is written in dark ink and is positioned above the printed name and title.

Lee Scott Dewey
Counsel for NRC Staff

Dated at Bethesda, Maryland
this 30th day of August, 1985