

September 1, 2006

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

DAVID GEISEN

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Docket No. IA-05-052

ASLBP No. 06-845-01-EA

THE NRC STAFF'S INTERROGATORIES,
DOCUMENT REQUESTS, AND REQUESTS FOR ADMISSION

Pursuant to 10 C.F.R. §§ 2.706(b), 2.707, 2.708, the NRC Staff (Staff) hereby requests that Mr. David Geisen respond to the following document requests, requests for admission, and interrogatories and produce, for inspection and copying, the documents requested below.

Each interrogatory shall be answered separately and fully, in writing, and under oath or affirmation and shall include all pertinent information available to Mr. Geisen, his counsel and individuals assisting Mr. Geisen in the challenge to the NRC enforcement order applicable to Mr. Geisen, based upon their personal knowledge, unless it is objected to, in which event the reasons for objection shall be stated in full. The answers shall be signed by the person making them, and the objections by the attorney making them. The production of documents requested herein shall take place at the Office of the General Counsel, 11555 Rockville Pike, Rockville, MD, unless other arrangements are made, by agreement, in this regard. Documents produced may be copies, or may be originals sent to Staff Counsel for copying and return.

GENERAL INSTRUCTIONS

1. To the extent that Mr. Geisen does not have specific, complete, and accurate information with which to answer any interrogatory, Mr. Geisen should so state, and the interrogatory should be answered to the extent information is available, identifying each person

who is believed to have accurate information with respect thereto.

2. Each interrogatory shall be deemed to be continuing, and Mr. Geisen is required seasonably to supplement answers with additional facts, documents, information, and names of witnesses which become known, in accordance with 10 C.F.R. § 2.705(e).

3. The words "and" and "or" shall be construed either conjunctively or disjunctively so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

4. Wherever appropriate, the singular form of a word shall be interpreted in the plural, and vice versa, so as to bring within the scope of these discovery requests any information that might otherwise be construed to be outside their scope.

5. Please produce a copy of each document requested in the form and condition in which it exists on the date of service of this request, including all comments, notes, remarks, and other material that may have been added to the document after its initial preparation.

6. If Mr. Geisen objects to or claims a privilege (*e.g.*, attorney-client, work product, or other) with respect to any interrogatory or document request, in whole or in part, or seeks to withhold documents or information because of the alleged proprietary or other nature of the data, please set forth all reasons and the underlying factual basis for the objection or claim of privilege in sufficient detail to permit the Atomic Safety and Licensing Board to determine the validity of the objection or claim of privilege. This description by Mr. Geisen should include, with respect to any document:

- a. author, addressor, addressee, and recipients of indicated and "blind" copies together with their job titles;
- b. date of preparation;
- c. subject matter;
- d. purpose for which the document was prepared;

- e. all persons to whom distributed, shown, or explained;
- f. present custodian;
- g. all persons believed to have a copy of the document; and
- h. the nature of the privilege or objection asserted.

7. For any document or part of a document that was at one time, but is no longer, in Mr. Geisen's possession, custody or control, or which is no longer in existence, or which cannot be located or produced, identify the document, state where and how it passed out of existence or why it can no longer be located or produced and the reasons therefore, and identify each person having knowledge concerning such disposition or loss and the contents of the document, and identify each document evidencing its prior existence and/or any fact concerning its nonexistence or loss.

8. When reference is made to a paragraph of the Order banning Mr. Geisen or the answer of Mr. Geisen, the reference will be according to the numbered system used in the Answer of Mr. Geisen.

**DEFINITIONS AND GUIDELINES TO BE USED
IN RESPONDING TO THESE DISCOVERY REQUESTS**

1. "Communication" shall mean correspondence, contact, discussion, or any other kind of written or oral exchange between two or more persons or entities including, but not limited to, all telephone conversations, face-to-face meetings or conversations, visits, conferences, and internal and external discussions, and exchange of a document or documents.

2. "Computer file" means all computer files, disks and diskettes of whatever type without regard to the manner in which the file is stored.

3. "Concerns," "Concerning," or any other derivative thereof, includes referring to, responding to, relating to, pertaining to, in connection with, comprising, memorializing,

commenting on, regarding, discussing, showing, describing, reflecting, analyzing, supporting, contradicting, and constituting.

4. "Document" or "writing" as used herein shall mean any written matter, whether produced, reproduced or stored on paper, cards, tapes, disks, belts, charts, film, computer file, computer storage devices or any other medium and shall include, without limitation, matter in the form of books, reports, studies, statements, speeches, notebooks, agreements, appointment calendars, working papers, manuals, memoranda, notes, procedures, orders, instructions, directions, training materials, records, correspondence, electronic mail, diaries, plans, diagrams, drawings, periodicals, lists, telephone logs, minutes, photographs, videos, and any published materials and shall also include, without limitation, originals, copies (with or without notes or changes thereon) and drafts.

5. "Identify" when used in reference to a natural person means to set forth the following:

- a. his/her name;
- b. his/her last known residential address;
- c. his/her last known business address;
- d. his/her current employer (if no current employer, his/her last employer);
- e. his/her employer at the time relevant to the question/request;
- f. his/her title or position;
- g. his/her area of responsibility;
- h. his/her business, professional, or other relationship with Mr. Geisen; and
- i. If any of the information is changed subsequent to the time period referenced in a particular interrogatory, then set forth in the answer, and label appropriately, current information as well as the information applicable to the time period referenced in the

interrogatory.

6. "Identify" when used in reference to a document shall mean to set forth the following:
 - a. its title;
 - b. its subject matter;
 - c. its date;
 - d. its author;
 - e. its addressee;
 - f. its file designation or other identifying designation; and
 - g. its present location and present custodian.
7. "Identify" with respect to a contact or communication shall set forth the following:
 - a. the date of the communication;
 - b. the place of the making and the place of receipt of the communication;
 - c. the type and means of communication;
 - d. the substance of the communication;
 - e. each person making the communication, and his/her location at the time the communication was made;
 - f. each person to whom the communication was made, and his/her location at the time the communication was made;
 - g. all other persons present during, participating in, or receiving the communication and the location of each such person at the time;
 - h. each document concerning such communication; and
 - i. each document upon which the communication is based or which is referred to in the communication.
8. "Meeting" refers to any communication (see definition 1) between more than two

persons, whether formal or informal.

9. "As-found" refers to examinations of the condition of the RV head, flanges, nozzles, and/or etc., prior to cleaning. "As-left" refers to examinations of the condition of the RV head, flanges, nozzles, and/or etc., after cleaning.

10. Documents produced in compliance with this request are to be accompanied with a specific indication as to the particular paragraph(s) of the Staff's discovery request under which the particular document(s) are being produced.

INTERROGATORIES

Below are a set of interrogatories posed to you by the NRC Staff. Each interrogatory is numbered and may contain multiple parts. For the sake of clarity, these multiple parts within a single interrogatory are often organized in outline form, with the first level of organization being represented by lower-case letters followed by a period (e.g. "a."), and the second level of organization being represented by lower-case Roman numerals followed by a period (e.g. "i."). Some of the questions will refer to "items" and/or "sub-items." "Item" refers to the first level of organization in the outline, and "sub-item" refers to the second level of organization in the outline. Interrogatory 1 is an example of the use of items and sub-items.

INTERROGATORY 1

In Mr. Geisen's initial disclosures filed on July 28, 2006, Mr. Geisen offers a list of persons "who may have discoverable information that may be relevant to disputed issues alleged with particularity in the pleadings." Below is an itemized list of issues. Identify all persons who might have information relevant to any of these itemized issues. For each person identified, list all item and sub-item issues for which that person might have relevant information. Also, unless otherwise specified, references to Mr. Geisen's knowledge of a fact(s) refers to knowledge he acquired at any time up to and including the time of the discovery of the Davis-Besse reactor vessel head degradation.

- a. Past inspections of the control rod drive mechanism (CRDM) flanges, and/or Mr. Geisen's knowledge thereof, that were performed during the following time periods:
 - i. 10 RFO;
 - ii. 11 RFO;

- iii. 12 RFO;
 - iv. outages prior to 10 RFO or outages not covered above (list the outage date for each outage identified for this sub-item).
- b. Past inspections of the CRDM nozzles and/or the Reactor Pressure Vessel (RPV) Head (including inspection or cleaning techniques used), and/or Mr. Geisen's knowledge thereof, that were performed during the following time periods:
 - i. 10 RFO;
 - ii. 11 RFO;
 - iii. 12 RFO;
 - iv. outages prior to 10 RFO or outages not covered above (list the outage date for each outage identified for this sub-item).
- c. Past cleanings of the Reactor Pressure Vessel (RPV) Head, and/or Mr. Geisen's knowledge thereof, that were performed during the following time periods:
 - i. 10 RFO;
 - ii. 11 RFO;
 - iii. 12 RFO;
 - iv. outages prior to 10 RFO or outages not covered above (list the outage date for each outage identified for this sub-item).
- d. The existence, extent, location, and/or color of boric acid left on the Reactor Vessel Head, and/or Mr. Geisen's knowledge thereof, after the following refueling outages at Davis-Besse:
 - i. 10 RFO;
 - ii. 11 RFO;
 - iii. 12 RFO;
 - iv. outages prior to 10 RFO or outages not covered above (list the outage date for each outage identified for this sub-item).
- e. The existence, extent, location, and/or color of boric acid found on the Reactor Vessel Head, and/or Mr. Geisen's knowledge thereof, during the following refueling outages at Davis-Besse:
 - i. 10 RFO;
 - ii. 11 RFO;
 - iii. 12 RFO;
 - iv. outages prior to 10 RFO or outages not covered above (list the outage date for each outage identified for this sub-item).
- f. The existence, amount, and/or identity of Control Rod Drive Mechanism (CRDM) nozzles that could not be inspected, and/or Mr. Geisen's knowledge thereof, during the following refueling outages at Davis-Besse:
 - i. 10 RFO;
 - ii. 11 RFO;
 - iii. 12 RFO;

- iv. outages prior to 10 RFO or outages not covered above (list the outage date for each outage identified for this sub-item).
- g. Any obstacles or difficulties (including surmountable ones) to inspection of the Reactor Vessel Head (and/or the CRDM nozzles), and/or Mr. Geisen's knowledge thereof, during the following refueling outages at Davis-Besse:
 - i. 10 RFO;
 - ii. 11 RFO;
 - iii. 12 RFO;
 - iv. outages prior to 10 RFO or outages not covered above (list the outage date for each outage identified for this sub-item).
- h. The existence, amount, and/or identity of CRDM flanges that were identified as leaking during the following refueling outages at Davis-Besse, or were repaired during the following refueling outages at Davis-Besse, (and/or Mr. Geisen's knowledge thereof):
 - i. 10 RFO;
 - ii. 11 RFO;
 - iii. 12 RFO;
 - iv. outages prior to 10 RFO or outages not covered above (list the outage date for each outage identified for this sub-item).
- i. Mr. Geisen's knowledge of Primary Water Stress Corrosion Cracking (PWSCC)
- j. Mr. Geisen's knowledge of the effects of, the prevention of, and/or the mitigation of boric acid corrosion.
- k. Mr. Geisen's general technical knowledge with regard to cracking of CRDM nozzles.
- l. Mr. Geisen's knowledge of the unidentified Reactor Coolant System Leakage experienced at Davis-Besse.
- m. Mr. Geisen's knowledge of the RC-2 event at Davis-Besse.
- n. Drafting, providing input for, doing technical work for, reviewing, revising, meeting on, communicating about, discussing, commenting on, and/or other actions taken with respect to Serial 2731 by the following people:
 - i. Mr. Geisen;
 - ii. persons other than Mr. Geisen.
- o. Drafting, providing input for, doing technical work for, reviewing, revising, meeting on, communicating about, discussing, commenting on, and/or other actions taken with respect to Serial 2735 by the following people:
 - i. Mr. Geisen;
 - ii. persons other than Mr. Geisen.

- p. Drafting, providing input for, doing technical work for, reviewing, revising, meeting on, communicating about, discussing, commenting on, and/or other actions taken with respect to Serial 2741 by the following people:
 - i. Mr. Geisen;
 - ii. persons other than Mr. Geisen.
- q. Drafting, providing input for, doing technical work for, reviewing, revising, meeting on, communicating about, discussing, commenting on, Mr. Geisen's actions with respect to, and/or other actions taken with respect to Serial 2744 by the following people:
 - i. Mr. Geisen;
 - ii. persons other than Mr. Geisen.
- r. Preparing for, communicating about, preparing slides or agenda for, discussing, meeting on, providing input for, doing technical work for, documents presented during, presentations made during, and/or other actions taken with respect to the teleconference with the NRC on October 3, 2001, by the following people:
 - i. Mr. Geisen;
 - ii. persons other than Mr. Geisen.
- s. Preparing for, communicating about, preparing slides or agenda for, discussing, meeting on, providing input for, doing technical work for, documents presented during, presentations made during, and/or other actions taken with respect to the meeting with the Commissioners' Technical Assistants (TAs) on October 11, 2001, by the following people:
 - i. Mr. Geisen;
 - ii. persons other than Mr. Geisen.
- t. Preparing for, communicating about, preparing slides or agenda for, discussing, meeting on, providing input for, doing technical work for, documents presented during, presentations made during, and/or other actions taken with respect to the presentation made to the ACRS on November 9, 2001, by the following people:
 - i. Mr. Geisen;
 - ii. persons other than Mr. Geisen.
- u. The correction of, updating of, clarifying of, and/or materiality of any of Davis- Besse's statements, impressions, or omissions that are identified in the Order, or providing material facts relevant to the condition of the vessel head and existence of boron deposits thereon during the period from 1995 to 2001.

INTERROGATORY 2

Identify all persons who assisted Mr. Geisen in preparing answers to these written discovery questions/requests/admissions or all persons Mr. Geisen consulted in preparing

answers to these questions/requests/admissions. For each person, identify all interrogatories, document requests, and admissions that person assisted with or was consulted on.

INTERROGATORY 3

_____ Identify every position held by Mr. Geisen in the nuclear industry and all other positions involving nuclear power generation (including military service).

- a. For each position identified, provide the name of the facility (or job location).
- b. For each position identified, describe the duties/responsibilities of that position including supervisory responsibilities.
- c. For each position identified, state whether the position was considered a management level position.
- d. For each position identified at DBNPS, describe Mr. Geisen's interactions, if any, with other offices of the DBNPS organization and with industry groups, including, but not limited to, EPRI, B&W Owners Group, and/or MRP.
- e. For each position identified, describe Mr. Geisen's interactions with the NRC.
- f. For each position identified, describe the education/subject matter expertise required to fill the position and the training Mr. Geisen received while in that position.
- g. For each position identified, state whether Mr. Geisen's duties/responsibilities included drafting or reviewing condition reports (CRs), modification requests (MODs), work orders, possible condition adverse to quality reports (PCAQRs), licensee event reports (LERs), INPO reports, NRC Bulletins, or NRC Generic Letters (GLs), either in the ordinary course of his position or under special circumstances. If while holding a particular position Mr. Geisen was responsible for reviewing or drafting the aforementioned documents only in special circumstances, identify those circumstances.

INTERROGATORY 4

Describe Mr. Geisen's employment situation as the Design Engineering Manager with regard to the following:

- a. promotions/opportunities for advancement;
- b. raises (increases in salary);

- c. incentive/performance-based pay and criteria for receipt;
- d. and performance evaluations, including but not limited to, criteria to evaluate performance and individuals evaluating Mr. Moffitt.

Provide copies of all documentation concerning the above topics.

INTERROGATORY 5

Describe Mr. Geisen's involvement/interactions with the utility response group organized by Mr. Miller in August 2001. Identify meetings, activities, and discussions that Mr. Geisen participated in by giving their dates, the identities of other participants in the meeting/activity/discussion, and the topics covered by the meeting/activity/discussion.

INTERROGATORY 6

Regarding 10 RFO in 1996,

- a. Were any videos of the inspection of, cleaning of, and/or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed by Mr. Geisen? If so, identify each video viewed by specifically identifying (1) whether the video was edited or not and (2) whether the video was an as-found video, an as-left video(s), and/or a video during performance of the inspection. For each video Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the videos, including but not limited to, approximately how much of the head was covered in the video and approximately how many nozzles were covered in the video; Also, for each video, specifically identify how Mr. Geisen obtained the video and from whom, and identify whether the video had been viewed on or before the following events:

- i. August 1, 2001;
- ii. Submission of Serial 2731 on September 4, 2001;
- iii. Teleconference with the NRC Staff on October 3, 2001;
- iv. Briefing of the Commissioners' TAs on October 11, 2001;
- v. Submission of Serial 2735 on October 17, 2001;
- vi. Submission of Serial 2744 on October 30, 2001;
- vii. Presentation to the ACRS on November 9, 2001.

For each video Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the videos, including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the videos, and (2) where and when Mr. Geisen viewed the videos. Identify each and every written record Mr. Geisen made relating to the videos, including any notes, written descriptions of the videos, meeting summaries or notes, and any calendar or appointment records related to those viewings.

- b. Were any photos of the inspection of, cleaning of, and or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed

by Mr. Geisen? If so, identify each photo (or collection of photos) viewed by specifically identifying (1) whether the photo(s) were of the as-found condition or the as-left condition and (2) approximately how much of the head was covered in the photo(s). For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the photo(s), including but not limited to, approximately how many nozzles were covered in the photo(s). Also, for each photo (or collection of photos), specifically identify how Mr. Geisen obtained the photo(s) and from whom, and identify whether the photo(s) had been viewed on or before the following events:

- i. August 1, 2001;
- ii. Submission of Serial 2731 on September 4, 2001;
- iii. Teleconference with the NRC Staff on October 3, 2001;
- iv. Briefing of the Commissioners' TAs on October 11, 2001;
- v. Submission of Serial 2735 on October 17, 2001;
- vi. Submission of Serial 2744 on October 30, 2001;
- vii. Presentation to the ACRS on November 9, 2001.

For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the photo(s), including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the photo(s), and (2) where and when Mr. Geisen viewed the photo(s). Identify each and every written record Mr. Geisen made relating to the photo(s), including any notes, written descriptions of the photo(s), meeting summaries or notes, and any calendar or appointment records related to those viewings.

- c. Was any documentation of the inspection of, cleaning of, and or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed by Mr. Geisen? If so, specifically identify (1) the document; (2) what role Mr. Geisen had in creating, contributing to, reviewing, or approving the document (if any); and (3) the specific date Mr. Geisen first viewed the document. Also, for each document, identify how Mr. Geisen obtained the document and from whom, and identify whether the document had been viewed on or before the following events:

- i. August 1, 2001;
- ii. Submission of Serial 2731 on September 4, 2001;
- iii. Teleconference with the NRC Staff on October 3, 2001;
- iv. Briefing of the Commissioners' TAs on October 11, 2001;
- v. Submission of Serial 2735 on October 17, 2001;
- vi. Submission of Serial 2744 on October 30, 2001;
- vii. Presentation to the ACRS on November 9, 2001.

- d. Were persons consulted by Mr. Geisen regarding the inspection of, cleaning of, and/or the condition of the RPV head and/or CRDM nozzles that were performed in this outage? If so, specifically identify each person consulted, the specific dates that person was consulted, and for what specific purpose(s) that person was consulted.

- e. Were any videos of the inspection and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, identify each video viewed by specifically identifying (1) whether the video was edited or not and (2) whether the video was of the inspection and/or repair. For each video Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the videos, including but not limited to, approximately how many of the flanges were covered in the video, how many appeared to be leaking, and the extent of the leakage. Also, for each video, specifically identify how Mr. Geisen obtained the video and from whom, and identify whether the video had been viewed on or before the following events:
- i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
 - iii. Teleconference with the NRC Staff on October 3, 2001;
 - iv. Briefing of the Commissioners' TAs on October 11, 2001;
 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.
- For each video Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the videos, including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the videos, and (2) where and when Mr. Geisen viewed the videos. Identify each and every written record Mr. Geisen made relating to the videos, including any notes, written descriptions of the videos, meeting summaries or notes, and any calendar or appointment records related to those viewings.
- f. Were any photos of the inspection of, condition of, and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, identify each photo (or collection of photos) viewed by specifically identifying whether the photo(s) were of the inspection and/or repair. For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the photo(s), including but not limited to, approximately how many of the flanges were covered in the photo(s); how many flanges appeared to be leaking, and to what extent they appeared to be leaking. Also, for each photo (or collection of photos), specifically identify how Mr. Geisen obtained the photo(s) and from whom, and identify whether the photo(s) had been viewed on or before the following events:
- i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
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 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.
- For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the photo(s),

including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the photo(s), and (2) where and when Mr. Geisen viewed the photo(s). Identify each and every written record Mr. Geisen made relating to the photo(s), including any notes, written descriptions of the photo(s), meeting summaries or notes, and any calendar or appointment records related to those viewings.

- g. Was any documentation of the inspection of, condition of, and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, specifically identify (1) the document; (2) what role Mr. Geisen had in creating, contributing to, reviewing, or approving the document (if any); (3) and the specific date Mr. Geisen first viewed the document. Also, for each document, specifically identify how Mr. Geisen obtained the document and from whom, and identify whether the document had been viewed on or before the following events:
 - i. August 1, 2001;
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 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.
- h. Were persons consulted by Mr. Geisen regarding the inspection of, condition of, and/or repair of the CRDM flanges that were performed in this outage? If so, specifically identify each person consulted, the specific dates that person was consulted, and for what specific purpose(s) that person was consulted.

INTERROGATORY 7

Regarding 11 RFO in 1998,

- a. Were any videos of the inspection of, cleaning of, and/or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed by Mr. Geisen? If so, identify each video viewed by specifically identifying (1) whether the video was edited or not and (2) whether the video was an as-found video, an as-left video(s), and/or a video during performance of the inspection. For each video Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the videos, including but not limited to, approximately how much of the head was covered in the video and approximately how many nozzles were covered in the video; Also, for each video, specifically identify how Mr. Geisen obtained the video and from whom, and identify whether the video had been viewed on or before the following events:
 - i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
 - iii. Teleconference with the NRC Staff on October 3, 2001;

- iv. Briefing of the Commissioners' TAs on October 11, 2001;
- v. Submission of Serial 2735 on October 17, 2001;
- vi. Submission of Serial 2744 on October 30, 2001;
- vii. Presentation to the ACRS on November 9, 2001.

For each video Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the videos, including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the videos, and (2) where and when Mr. Geisen viewed the videos. Identify each and every written record Mr. Geisen made relating to the videos, including any notes, written descriptions of the videos, meeting summaries or notes, and any calendar or appointment records related to those viewings.

- b. Were any photos of the inspection of, cleaning of, and or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed by Mr. Geisen? If so, identify each photo (or collection of photos) viewed by specifically identifying (1) whether the photo(s) were of the as-found condition or the as-left condition and (2) approximately how much of the head was covered in the photo(s). For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the photo(s), including but not limited to, approximately how many nozzles were covered in the photo(s). Also, for each photo (or collection of photos), specifically identify how Mr. Geisen obtained the photo(s) and from whom, and identify whether the photo(s) had been viewed on or before the following events:

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- c. Was any documentation of the inspection of, cleaning of, and or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed by Mr. Geisen? If so, specifically identify (1) the document; (2) what role Mr. Geisen had in creating, contributing to, reviewing, or approving the document (if any); and (3) the specific date Mr. Geisen first viewed the document. Also, for each document, identify how Mr. Geisen obtained the document and from whom, and identify whether the document had been viewed on or before the following

events:

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 - iv. Briefing of the Commissioners' TAs on October 11, 2001;
 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.
- d. Were persons consulted by Mr. Geisen regarding the inspection of, cleaning of, and/or the condition of the RPV head and/or CRDM nozzles that were performed in this outage? If so, specifically identify each person consulted, the specific dates that person was consulted, and for what specific purpose(s) that person was consulted.
- e. Were any videos of the inspection and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, identify each video viewed by specifically identifying (1) whether the video was edited or not and (2) whether the video was of the inspection and/or repair. For each video Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the videos, including but not limited to, approximately how many of the flanges were covered in the video, how many appeared to be leaking, and the extent of the leakage. Also, for each video, specifically identify how Mr. Geisen obtained the video and from whom, and identify whether the video had been viewed on or before the following events:
- i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
 - iii. Teleconference with the NRC Staff on October 3, 2001;
 - iv. Briefing of the Commissioners' TAs on October 11, 2001;
 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.
- For each video Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the videos, including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the videos, and (2) where and when Mr. Geisen viewed the videos. Identify each and every written record Mr. Geisen made relating to the videos, including any notes, written descriptions of the videos, meeting summaries or notes, and any calendar or appointment records related to those viewings.
- f. Were any photos of the inspection of, condition of, and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, identify each photo (or collection of photos) viewed by specifically identifying whether the photo(s) were of the inspection and/or repair. For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the photo(s), including but not limited to, approximately how many of the

flanges were covered in the photo(s); how many flanges appeared to be leaking, and to what extent they appeared to be leaking. Also, for each photo (or collection of photos), specifically identify how Mr. Geisen obtained the photo(s) and from whom, and identify whether the photo(s) had been viewed on or before the following events:

- i. August 1, 2001;
- ii. Submission of Serial 2731 on September 4, 2001;
- iii. Teleconference with the NRC Staff on October 3, 2001;
- iv. Briefing of the Commissioners' TAs on October 11, 2001;
- v. Submission of Serial 2735 on October 17, 2001;
- vi. Submission of Serial 2744 on October 30, 2001;
- vii. Presentation to the ACRS on November 9, 2001.

For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the photo(s), including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the photo(s), and (2) where and when Mr. Geisen viewed the photo(s). Identify each and every written record Mr. Geisen made relating to the photo(s), including any notes, written descriptions of the photo(s), meeting summaries or notes, and any calendar or appointment records related to those viewings.

- g. Was any documentation of the inspection of, condition of, and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, specifically identify (1) the document; (2) what role Mr. Geisen had in creating, contributing to, reviewing, or approving the document (if any); (3) and the specific date Mr. Geisen first viewed the document. Also, for each document, specifically identify how Mr. Geisen obtained the document and from whom, and identify whether the document had been viewed on or before the following events:
 - i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
 - iii. Teleconference with the NRC Staff on October 3, 2001;
 - iv. Briefing of the Commissioners' TAs on October 11, 2001;
 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.
- h. Were persons consulted by Mr. Geisen regarding the inspection of, condition of, and/or repair of the CRDM flanges that were performed in this outage? If so, specifically identify each person consulted, the specific dates that person was consulted, and for what specific purpose(s) that person was consulted.

INTERROGATORY 8

Regarding 12 RFO in 2000,

- a. Were any videos of the inspection of, cleaning of, and/or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed

by Mr. Geisen? If so, identify each video viewed by specifically identifying (1) whether the video was edited or not and (2) whether the video was an as-found video, an as-left video(s), and/or a video during performance of the inspection. For each video Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the videos, including but not limited to, approximately how much of the head was covered in the video and approximately how many nozzles were covered in the video; Also, for each video, specifically identify how Mr. Geisen obtained the video and from whom, and identify whether the video had been viewed on or before the following events:

- i. August 1, 2001;
- ii. Submission of Serial 2731 on September 4, 2001;
- iii. Teleconference with the NRC Staff on October 3, 2001;
- iv. Briefing of the Commissioners' TAs on October 11, 2001;
- v. Submission of Serial 2735 on October 17, 2001;
- vi. Submission of Serial 2744 on October 30, 2001;
- vii. Presentation to the ACRS on November 9, 2001.

For each video Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the videos, including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the videos, and (2) where and when Mr. Geisen viewed the videos. Identify each and every written record Mr. Geisen made relating to the videos, including any notes, written descriptions of the videos, meeting summaries or notes, and any calendar or appointment records related to those viewings.

- b. Were any photos of the inspection of, cleaning of, and or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed by Mr. Geisen? If so, identify each photo (or collection of photos) viewed by specifically identifying (1) whether the photo(s) were of the as-found condition or the as-left condition and (2) approximately how much of the head was covered in the photo(s). For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the photo(s), including but not limited to, approximately how many nozzles were covered in the photo(s). Also, for each photo (or collection of photos), specifically identify how Mr. Geisen obtained the photo(s) and from whom, and identify whether the photo(s) had been viewed on or before the following events:

- i. August 1, 2001;
- ii. Submission of Serial 2731 on September 4, 2001;
- iii. Teleconference with the NRC Staff on October 3, 2001;
- iv. Briefing of the Commissioners' TAs on October 11, 2001;
- v. Submission of Serial 2735 on October 17, 2001;
- vi. Submission of Serial 2744 on October 30, 2001;
- vii. Presentation to the ACRS on November 9, 2001.

For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the photo(s),

including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the photo(s), and (2) where and when Mr. Geisen viewed the photo(s). Identify each and every written record Mr. Geisen made relating to the photo(s), including any notes, written descriptions of the photo(s), meeting summaries or notes, and any calendar or appointment records related to those viewings.

- c. Was any documentation of the inspection of, cleaning of, and or the condition of the RPV head and/or CRDM nozzles from this refueling outage viewed by Mr. Geisen? If so, specifically identify (1) the document; (2) what role Mr. Geisen had in creating, contributing to, reviewing, or approving the document (if any); and (3) the specific date Mr. Geisen first viewed the document. Also, for each document, identify how Mr. Geisen obtained the document and from whom, and identify whether the document had been viewed on or before the following events:
 - i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
 - iii. Teleconference with the NRC Staff on October 3, 2001;
 - iv. Briefing of the Commissioners' TAs on October 11, 2001;
 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.
- d. Were persons consulted by Mr. Geisen regarding the inspection of, cleaning of, and/or the condition of the RPV head and/or CRDM nozzles that were performed in this outage? If so, specifically identify each person consulted, the specific dates that person was consulted, and for what specific purpose(s) that person was consulted.
- e. Were any videos of the inspection and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, identify each video viewed by specifically identifying (1) whether the video was edited or not and (2) whether the video was of the inspection and/or repair. For each video Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the videos, including but not limited to, approximately how many of the flanges were covered in the video, how many appeared to be leaking, and the extent of the leakage. Also, for each video, specifically identify how Mr. Geisen obtained the video and from whom, and identify whether the video had been viewed on or before the following events:
 - i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
 - iii. Teleconference with the NRC Staff on October 3, 2001;
 - iv. Briefing of the Commissioners' TAs on October 11, 2001;
 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.For each video Mr. Geisen viewed, describe with particularity the circumstances

under which Mr. Geisen viewed the videos, including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the videos, and (2) where and when Mr. Geisen viewed the videos. Identify each and every written record Mr. Geisen made relating to the videos, including any notes, written descriptions of the videos, meeting summaries or notes, and any calender or appointment records related to those viewings.

- f. Were any photos of the inspection of, condition of, and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, identify each photo (or collection of photos) viewed by specifically identifying whether the photo(s) were of the inspection and/or repair. For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity any and all observations Mr. Geisen made with regard to the photo(s), including but not limited to, approximately how many of the flanges were covered in the photo(s); how many flanges appeared to be leaking, and to what extent they appeared to be leaking. Also, for each photo (or collection of photos), specifically identify how Mr. Geisen obtained the photo(s) and from whom, and identify whether the photo(s) had been viewed on or before the following events:
- i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
 - iii. Teleconference with the NRC Staff on October 3, 2001;
 - iv. Briefing of the Commissioners' TAs on October 11, 2001;
 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;
 - vii. Presentation to the ACRS on November 9, 2001.
- For each photo (or collection of photos) Mr. Geisen viewed, describe with particularity the circumstances under which Mr. Geisen viewed the photo(s), including but not limited to: (1) with whom, if any one, Mr. Geisen viewed the photo(s), and (2) where and when Mr. Geisen viewed the photo(s). Identify each and every written record Mr. Geisen made relating to the photo(s), including any notes, written descriptions of the photo(s), meeting summaries or notes, and any calender or appointment records related to those viewings.
- g. Was any documentation of the inspection of, condition of, and/or repair of the CRDM flanges from this refueling outage viewed by Mr. Geisen? If so, specifically identify (1) the document; (2) what role Mr. Geisen had in creating, contributing to, reviewing, or approving the document (if any); (3) and the specific date Mr. Geisen first viewed the document. Also, for each document, specifically identify how Mr. Geisen obtained the document and from whom, and identify whether the document had been viewed on or before the following events:
- i. August 1, 2001;
 - ii. Submission of Serial 2731 on September 4, 2001;
 - iii. Teleconference with the NRC Staff on October 3, 2001;
 - iv. Briefing of the Commissioners' TAs on October 11, 2001;
 - v. Submission of Serial 2735 on October 17, 2001;
 - vi. Submission of Serial 2744 on October 30, 2001;

- vii. Presentation to the ACRS on November 9, 2001.
- h. Were persons consulted by Mr. Geisen regarding the inspection of, condition of, and/or repair of the CRDM flanges that were performed in this outage? If so, specifically identify each person consulted, the specific dates that person was consulted, and for what specific purpose(s) that person was consulted.

INTERROGATORY 9

With respect to the October 3, 2001, conference call with the NRC,

- a. Specifically describe the nature and extent of Mr. Geisen's activities during the October 3 conference call.
- b. Specifically describe the nature and extent of Mr. Geisen's preparation for the October 3 conference call, including a list of the documents/photos/videos/persons Mr. Geisen consulted in his preparations, and the reason that document/photo/video/person was consulted. For each and every photo or video identified, describe with particularity Mr. Geisen's observations, including but not limited to, a description of the specific equipment and portions thereof in the photo or video, the specific location of the equipment, when the photo or video was taken, including the specific RFO, and whether the photo or video represents conditions before or after any cleaning activities; i.e., whether they represent as-left or as-found conditions. If the photo or video represents as-left conditions, identify all cleaning actions that were performed prior to the photo or video.
- c. Specifically identify every meeting Mr. Geisen attended in which preparations were made for the October 3 conference call with the NRC, the date of those meetings, and the participants in those meetings. Specifically describe Mr. Geisen's activities during each meeting and any actions Mr. Geisen took as a result of each meeting. Also, for each meeting, identify which of the topics listed below in item e. were topics covered in that meeting. For each topic so identified, follow the instructions in item e. that are associated with that topic.
- d. Other than the meetings identified and described in b., identify every meeting Mr. Geisen attended, discussion Mr. Geisen engaged in, or communication Mr. Geisen made or received, in preparation for or to discuss the communications or outcome of the October 3 conference call. For each meeting and/or discussion, specifically identify the date, the participants, and Mr. Geisen's part in the meeting or discussion. For each communication, specifically identify the date, sender, and recipient. Specifically describe any actions Mr. Geisen took as a result of each meeting, discussion, or communication. Also, for each meeting, discussion, or communication, specifically identify which of the topics

listed below in item e. were topics covered in the meeting, discussion, or communication. For each topic so identified, follow the instructions in item e. that are associated with that topic.

- e. Topics related to the response to the Bulletin which include, but are not limited to, the following:
 - i. the following topics with regard to inspections of the CRDM nozzles on the RPV head in 10 RFO, 11 RFO, and/or 12 RFO: whether there were any impediments to inspection of the nozzles, whether the boric acid left on the head was an impediment to inspection, whether the insulation just above the head was an impediment to inspection, whether the structure of the head itself was an impediment to inspection, whether the size and location of the weep holes was an impediment to inspection, what an impediment to inspection consisted of, what would be evidence of nozzle leakage, whether a nozzle completely or partially obscured by boron could be said not to evidence nozzle leakage, and/or whether an inaccessible nozzle could be said not to evidence nozzle leakage. If there was a discussion or communication on any of these topics, specifically identify for each topic who engaged in discussions, or sent or received communications, and specifically identify the contents of those discussions or communications;
 - ii. the following topics with regard to boric acid on the RPV head in 10 RFO, 11 RFO, and/or 12 RFO: the amount, location and/or extent of boric acid on the head as-found; the amount, location and/or extent of boric acid on the head as-left; the possible sources of boric acid on the head; whether nozzle leakage could be a source of boric acid on the head; whether boric acid deposits were limited to areas directly beneath those flanges thought to be leaking. If there was a discussion or communication on any of these topics, specifically identify for each topic who engaged in discussions, or sent or received communications, and specifically describe the contents of those discussions or communications;
 - iii. the following topics with respect to boric acid corrosion: corrosive effects of boric acid on the head, which structures on the head might be susceptible to boric acid corrosion, the boric acid corrosion control program. If there was a discussion or communication on any of these topics, specifically identify for each topic who engaged in discussions, or sent or received communications, and specifically describe the contents of those discussions or communications;
 - iv. the following topics with respect to CRDM flange leakage and 10 RFO, 11 RFO, and/or 12 RFO: whether flange leakage was detected, how many flanges were leaking, which flanges were leaking, the volume of flange leakage. If there was a discussion or communication on any of these topics, specifically identify for

- each topic who engaged in discussions, or sent or received communications, and specifically describe the contents of those discussions or communications;
- v. video or photo reviews of inspections from past outages, the nature of those reviews, the thoroughness of those reviews, and/or the results of those reviews; If there was a discussion or communication on any of these topics, specifically identify for each topic who engaged in discussions, or sent or received communications, and specifically describe the contents of those discussions or communications;
- f. Identify all documents associated with any meetings identified above, including but not limited to, all notes, meeting summaries, participant lists, e-mails and calendar notations, and all documents reviewed and/or discussed during such meetings.
- g. For each meeting/communication/discussion identified above, identify the contents discussed or communicated on the following topics: the substance or form of Davis-Besse's presentation, Mr. Geisen's role in the presentation, Mr. Geisen's role in preparing the presentation, the technical basis for Davis-Besse's presentation (including the adequacy or inadequacy thereof), and/or the completeness or accuracy of Davis-Besse's presentation.

INTERROGATORY 10

With respect to the October 11, 2001, briefing with the Commissioners' Technical Assistants (TAs),

- a. Specifically describe the nature and extent of Mr. Geisen's activities during the October 11 briefing, including the specific identity of all documents used in the briefing. Also, specifically identify all slides Mr. Geisen presented at the briefing.
- b. Specifically describe the nature and extent of Mr. Geisen's preparation for the October 11 briefing, including a list of the documents/photos/videos/persons Mr. Geisen consulted in Mr. Geisen's preparations, and the reason that document/photo/video/person was consulted. For each and every photo or video identified, describe with particularity Mr. Geisen's observations, including but not limited to, a description of the specific equipment and portions thereof in the photo or video, the specific location of the equipment, when the photo or video was taken, including the specific RFO, and whether the photo or video represents conditions before or after any cleaning activities; i.e., whether they represent as-left or as-found conditions. If the photo or video represents as-left conditions, identify all cleaning actions that were performed prior to the photo or video. Also, specifically identify all presentations slides and/or draft slides that Mr. Geisen prepared,

contributed to, provided input for, or commented on.

- c. Specifically identify every meeting Mr. Geisen attended in which preparations were made for the October 11 briefing, the date of those meetings, and the participants in those meetings. Specifically describe Mr. Geisen's activities during each meeting and any actions Mr. Geisen took as a result of each meeting. Also, for each meeting, specifically identify which of the topics listed in item e. of Interrogatory 9 were topics covered in that meeting. For each topic so identified, follow the instructions in item e. that are associated with that topic.
- d. Other than the meetings identified and described in b., identify every meeting Mr. Geisen attended, discussion Mr. Geisen engaged in, or communication Mr. Geisen made or received, in preparation for or to discuss the communications or outcome of the October 11 briefing. For each meeting and/or discussion, specifically identify the date, the participants, and Mr. Geisen's part in the meeting or discussion. For each communication, specifically identify the date, sender, and recipient. Specifically describe any actions Mr. Geisen took as a result of each meeting, discussion, or communication. Also, for each meeting, discussion, or communication, specifically identify which of the topics listed in item e. of Interrogatory 9 were topics covered in the meeting, discussion, or communication. For each topic so identified, follow the instructions in item e. that are associated with that topic.
- e. Identify all documents associated with any meetings identified above, including but not limited to, all notes, meeting summaries, participant lists, e-mails and calendar notations, and all documents reviewed and/or discussed during such meetings.
- f. For each meeting/communication/discussion identified above, identify the contents discussed or communicated on the following topics: the substance or form of Davis-Besse's presentation, Mr. Geisen's role in the presentation, Mr. Geisen's role in preparing the presentation, the technical basis for Davis-Besse's presentation (including the adequacy or inadequacy thereof), and/or the completeness or accuracy of Davis-Besse's presentation.

INTERROGATORY 11

With respect to the November 9, 2001, presentation to the ACRS,

- a. Specifically describe the nature and extent of Mr. Geisen's activities during the November 9 presentation, including the specific identity of all documents used in the briefing.
- b. Specifically describe the nature and extent of Mr. Geisen's preparation for the November 9 presentation, including a list of the

documents/photos/videos/persons Mr. Geisen consulted in Mr. Geisen's preparations, and the reason that document/photo/video/person was consulted. For each and every photo or video identified, describe with particularity Mr. Geisen's observations, including but not limited to, a description of the specific equipment and portions thereof in the photo or video, the specific location of the equipment, when the photo or video was taken, including the specific RFO, and whether the photo or video represents conditions before or after any cleaning activities; i.e., whether they represent as-left or as-found conditions. If the photo or video represents as-left conditions, identify all cleaning actions that were performed prior to the photo or video.

- c. Specifically identify every meeting Mr. Geisen attended in which preparations were made for the November 9 presentation, the date of those meetings, and the participants in those meetings. Specifically describe the topics of discussion in each meeting, Mr. Geisen's activities during each meeting and any actions Mr. Geisen took as a result of each meeting. Specifically describe Mr. Geisen's activities during each meeting and any actions Mr. Geisen took as a result of each meeting. Also, for each meeting, specifically identify which of the topics listed in item e. of Interrogatory 9 were topics covered in that meeting. For each topic so identified, follow the instructions in item e. that are associated with that topic.
- d. Other than the meetings identified and described in b., identify every meeting Mr. Geisen attended, discussion Mr. Geisen engaged in, or communication Mr. Geisen made or received, in preparation for or to discuss the communications or outcome of the November 9 presentation. For each meeting and/or discussion, specifically identify the date, the participants, and Mr. Geisen's part in the meeting or discussion. For each communication, specifically identify the date, sender, and recipient. Specifically describe any actions Mr. Geisen took as a result of each meeting, discussion, or communication. Finally, for each meeting, discussion, or communication, specifically identify which of the topics listed in item e. of Interrogatory 9 were topics covered in the meeting, discussion, or communication. For each topic so identified, follow the instructions in item e. that are associated with that topic.
- e. Identify all documents associated with any meetings identified above, including but not limited to, all notes, meeting summaries, participant lists, e-mails and calendar notations, and all documents reviewed and/or discussed during such meetings.
- f. For each meeting/communication/discussion identified above, identify the contents discussed or communicated on the following topics: the substance or form of Davis-Besse's presentation, Mr. Geisen's role in the presentation, Mr. Geisen's role in preparing the presentation, the technical basis for Davis-Besse's presentation (including the adequacy

or inadequacy thereof), and/or the completeness or accuracy of Davis-Besse's presentation.

INTERROGATORY 12

With respect to the September 4, 2001, submission of Serial 2731 to the NRC, please answer the following:

- a. Specifically describe the nature and extent of Mr. Geisen's involvement in reviewing or contributing to Serial 2731 or drafts thereof. Specifically identify the documents, photos, videos, and/or persons Mr. Geisen consulted either in commenting on, contributing to, concurring on, reviewing, discussing, or understanding the Serial. Also, identify the purpose for consulting that document, photo, video or person. For each photo or video identified, describe with particularity Mr. Geisen's observations, including but not limited to, what the video or photographs was of, what plant it was taken of, which refueling outage it was taken in, and whether it was as-left or as-found. If the photo or video represents as-left conditions, identify all cleaning actions that were performed prior to the photo or video.
- b. Specifically identify every draft of 2731 Mr. Geisen received and the specific date Mr. Geisen received it, and also specifically identify the date Mr. Geisen received the final submitted Serial. For each draft and for the final submitted serial, specifically identify the following:
 - i. whether Mr. Geisen read it;
 - ii. whether Mr. Geisen commented on it, to whom did Mr. Geisen send Mr. Geisen's comments, and the substance of Mr. Geisen's comments;
 - iii. whether Mr. Geisen discussed it, with whom did Mr. Geisen discuss it, and the specific topics of discussion;
 - iv. any language Mr. Geisen contributed;
 - v. any regulatory judgment Mr. Geisen contributed; and
 - vi. any technical data or judgment Mr. Geisen contributed.
- c. Separately identify every meeting Mr. Geisen attended, discussion Mr. Geisen engaged in, or communication Mr. Geisen made or received, which involved the initial response to the Bulletin. Meetings, discussions, and communications involving the initial response to the Bulletin would include discussions of drafts of Serial 2731 and discussions of topics related to the response to the NRC (which topics include, but are not limited to, the topics identified below and in item e. of Interrogatory 9). For each meeting, discussion, or communication, specifically identify (1) the date it occurred; (2) the participants involved; (3) Mr. Geisen's own activities and statements during that particular meeting, discussion, or communication; and (4) any actions Mr. Geisen took as a result of that meeting, discussion, or communication. Also, specifically identify which of the of the topics listed below were topics covered in the meeting,

discussion, or communication.

- i. what facts, language, or arguments should be included or excluded from Serial 2731. Specifically identify what facts, language, or arguments were discussed for inclusion or exclusion. Also, specifically identify who engaged in those discussions, or sent or received those communications, and specifically describe the contents of those discussions or communications;
 - ii. the technical bases underlying the statements made in the Serial. Specifically identify the technical bases involved and the corresponding statements in the Serial. Also, specifically identify who engaged in those discussions, or sent or received those communications, and specifically describe the contents of those discussions or communications;
 - iii. the completeness or accuracy of Davis-Besse's submittal. Specifically identify who engaged in discussions, or sent or received communications, on this topic, and specifically describe the contents of those discussions or communications;
 - iv. any of the topics listed in item e. of Interrogatory 9. For each topic so identified, follow the instructions in item e. that are associated with that topic.
- d. Identify all documents associated with any meetings identified above, including but not limited to, all notes, meeting summaries, participant lists, e-mails and calendar notations, as well as all documents reviewed and/or discussed during such meetings.

INTERROGATORY 13

With respect to the October 17, 2001, submission of Serial 2735 to the NRC, please answer the following:

- a. Describe the nature and extent of Mr. Geisen's involvement in reviewing or contributing to Serial 2735 or drafts thereof. Identify the documents, photos, videos, and/or persons Mr. Geisen consulted either in commenting on, contributing to, concurring on, reviewing, discussing, or understanding the Serial. Also, identify the purpose for consulting that document or person. For each photo or video identified, describe with particularity Mr. Geisen's observations, including but not limited to, what the video or photographs was of, what plant it was taken of, which refueling outage it was taken in, and whether it was as-left or as-found. If the photo or video represents as-left conditions, identify all cleaning actions that were performed prior to the photo or video.
- b. Identify every draft of 2735 Mr. Geisen received and when Mr. Geisen received it, and also list when Mr. Geisen received the final submitted Serial. For each draft and for the final submitted serial, identify the following:

- i. whether Mr. Geisen read it;
 - ii. whether Mr. Geisen commented on it and to whom did Mr. Geisen send Mr. Geisen's comments;
 - iii. whether Mr. Geisen discussed it and with whom did Mr. Geisen discuss it;
 - iv. any language Mr. Geisen contributed;
 - v. any regulatory judgment Mr. Geisen contributed; and
 - vi. any technical data or judgment Mr. Geisen contributed.
- c. Separately list every meeting Mr. Geisen attended, discussion Mr. Geisen engaged in, or communication Mr. Geisen made or received, which involved the Serial 2735 response. Meetings, discussions, and communications involving the Serial 2735 response to the Bulletin would include discussions of drafts of Serial 2735 and discussions of topics related to the response to the NRC (which topics include, but are not limited to, the topics identified below and in item e. of Interrogatory 9). For each meeting, discussion, or communication, specifically identify (1) the date it occurred; (2) the participants involved; (3) Mr. Geisen's own activities and statements during that particular meeting, discussion, or communication; and (4) any actions Mr. Geisen took as a result of that meeting, discussion, or communication. Also, specifically identify which of the of the topics listed below were topics covered in the meeting, discussion, or communication.
 - i. what facts, language, or arguments should be included or excluded from Serial 2735. Specifically identify what facts, language, or arguments were discussed for inclusion or exclusion. Also, specifically identify who engaged in those discussions, or sent or received those communications, and specifically describe the contents of those discussions or communications;
 - ii. the technical bases underlying the statements made in the Serial. Specifically identify the technical bases involved and the corresponding statements in the Serial. Also, specifically identify who engaged in those discussions, or sent or received those communications, and specifically describe the contents of those discussions or communications;
 - iii. the completeness or accuracy of Davis-Besse's submittal. Specifically identify who engaged in discussions, or sent or received communications, on this topic, and specifically describe the contents of those discussions or communications;
 - iv. any of the topics listed in item e. of Interrogatory 9. For each topic so identified, follow the instructions in item e. that are associated with that topic.
- d. Identify all documents associated with any meetings identified above, including but not limited to, all notes, meeting summaries, participant lists, e-mails and calendar notations, as well as all documents reviewed and/or discussed during such meetings.

INTERROGATORY 14

With respect to the October 30, 2001, submission of Serial 2744 to the NRC, please answer the following:

- a. Describe the nature and extent of Mr. Geisen's involvement in reviewing or contributing to Serial 2744 or drafts thereof. Identify the documents, photos, videos, and/or persons Mr. Geisen consulted either in commenting on, contributing to, concurring on, reviewing, discussing, or understanding the Serial. Also, identify the purpose for consulting that document or person. For each photo or video identified, describe with particularity Mr. Geisen's observations, including but not limited to, what the video or photographs was of, what plant it was taken of, which refueling outage it was taken in, and whether it was as-left or as-found. If the photo or video represents as-left conditions, identify all cleaning actions that were performed prior to the photo or video.
- b. Identify every draft of 2744 Mr. Geisen received and when Mr. Geisen received it, and also list when Mr. Geisen received the final submitted Serial. For each draft and for the final submitted serial, identify the following:
 - i. whether Mr. Geisen read it;
 - ii. whether Mr. Geisen commented on it and to whom did Mr. Geisen send Mr. Geisenr comments;
 - iii. whether Mr. Geisen discussed it and with whom did Mr. Geisen discuss it;
 - iv. any language Mr. Geisen contributed;
 - v. any regulatory judgment Mr. Geisen contributed; and
 - vi. any technical data or judgment Mr. Geisen contributed.
- c. Separately list every meeting Mr. Geisen attended, discussion Mr. Geisen engaged in, or communication Mr. Geisen made or received, which involved the Serial 2744 response. Meetings, discussions, and communications involving the Serial 2744 response to the Bulletin would include discussions of drafts of Serial 2744 and discussions of topics related to the response to the NRC (which topics include, but are not limited to, the topics identified below and in item e. of Interrogatory 9). For each meeting, discussion, or communication, specifically identify (1) the date it occurred; (2) the participants involved; (3) Mr. Geisen's own activities and statements during that particular meeting, discussion, or communication; and (4) any actions Mr. Geisen took as a result of that meeting, discussion, or communication. Also, specifically identify which of the of the topics listed below were topics covered in the meeting, discussion, or communication.
 - i. what facts, language, or arguments should be included or excluded from Serial 2744. Specifically identify what facts, language, or arguments were discussed for inclusion or

- exclusion. Also, specifically identify who engaged in those discussions, or sent or received those communications, and specifically describe the contents of those discussions or communications;
- ii. the technical bases underlying the statements made in the Serial. Specifically identify the technical bases involved and the corresponding statements in the Serial. Also, specifically identify who engaged in those discussions, or sent or received those communications, and specifically describe the contents of those discussions or communications;
 - iii. the completeness or accuracy of Davis-Besse's submittal. Specifically identify who engaged in discussions, or sent or received communications, on this topic, and specifically describe the contents of those discussions or communications;
 - iv. any of the topics listed in item e. of Interrogatory 9. For each topic so identified, follow the instructions in item e. that are associated with that topic.
- d. Identify all documents associated with any meetings identified above, including but not limited to, all notes, meeting summaries, participant lists, e-mails and calendar notations, as well as all documents reviewed and/or discussed during such meetings.

INTERROGATORY 15

Other than the meetings, discussions, and communications identified in Interrogatories 9 to 15, identify every meeting Mr. Geisen attended, discussion Mr. Geisen engaged in, or communication Mr. Geisen made or received (prior to November 10, 2001) that involved Davis-Besse's response to the Bulletin 2001-01 or associated communications to the NRC (including, for dates preceding issuance of the Bulletin, responses to any anticipated NRC bulletin on CRDM nozzle cracking). Topics involving the response to the Bulletin would include topics identified below and in item e. of Interrogatory 9. For each meeting, discussion, or communication, specifically identify (1) the date it occurred; (2) the participants involved; (3) Mr. Geisen's own activities and statements during that particular meeting, discussion, or communication; and (4) any actions Mr. Geisen took as a result of that meeting, discussion, or communication. Also, specifically identify which of the of the topics listed below were covered in that meeting, discussion, or communication:

- a. Mr. Geisen's role in Davis-Besse's responses or communications to the NRC;
- b. the technical bases underlying the statements made (or were planned to be made) in the responses or communications to the NRC. Specifically identify the technical bases involved and the corresponding statements to the NRC. Also, specifically identify who engaged in those discussions, or sent or received those communications, and specifically describe the contents of those discussions or communications;

- c. the completeness or accuracy of Davis-Besse's responses or communications to the NRC. Specifically identify who engaged in discussions, or sent or received communications, on this topic, and specifically describe the contents of those discussions or communications;
- d. any of the topics listed in item e. of Interrogatory 9. For each topic so identified, follow the instructions in item e. that are associated with that topic.

Also, identify all documents associated with any meetings identified above, including but not limited to, all notes, meeting summaries, participant lists, e-mails and calendar notations, and all documents reviewed and/or discussed during such meetings.

INTERROGATORY 16

Paragraph 17 of our Order states that Mr. Geisen concurred on Serial 2731 although he knew that the response was materially incomplete and inaccurate in that Serial 2731 mischaracterized the accumulation of boric acid found on the RPV head during the 12 RFO inspection. Please answer the following:

- a. Does Mr. Geisen contend that Serial 2731 disclosed all facts concerning the nature and extent of boric acid on the RPV head during the 12 RFO inspection? If so, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- b. In the event Mr. Geisen contend that any facts concerning the nature and extent of boric acid on the RPV head in the 12 RFO were not disclosed, describe with particularity those facts that were not disclosed. With respect to each such fact, state whether Mr. Geisen contend that the fact was or was not relevant or material to Bulletin 2001-01. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- c. In the event that Mr. Geisen contend that relevant or material facts concerning the nature and extent of boric acid on the RPV head in the 12 RFO were not disclosed in Serial 2731, does Mr. Geisen contend that he was not aware of these facts? If so, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- d. For each nondisclosed fact identified in b. above, does Mr. Geisen contend that those facts were previously or contemporaneously disclosed to the NRC through other means? If so, for each non-disclosed fact describe the means by which the information was provided

to the NRC, including but not limited to, (1) whether the information was communicated orally, visually or in writing, (2) the individuals to whom the information was provided, and (3) the date on which the information was provided. Specifically describe all communications by which each fact was communicated to the NRC, and identify all notes, written documents, e-mails, calendar references or other information documenting those communications. Additionally, specifically state all other legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.

- e. For each nondisclosed fact identified in b. above, does Mr. Geisen contend that the failure to disclose those facts was corrected in a timely fashion by subsequent submissions and/or presentations? If so, for each non-disclosed fact describe the means by which the information was provided to the NRC, including but not limited to, (1) whether the information was communicated orally, visually or in writing, (2) the individuals to whom the information was provided, and (3) the date on which the information was provided. Specifically describe all communications by which each fact was communicated to the NRC, and identify all notes, written documents, e-mails, calendar references or other information documenting those communications. Additionally, specifically state all other legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.

INTERROGATORY 17

Paragraph 17 of our Order states that Mr. Geisen concurred on Serial 2731, which was materially incomplete and inaccurate in that Serial 2731 failed to include information that during the Eleventh Refueling Outage (11 RFO) and 12 RFO, Davis-Besse's access to the RPV bare metal head was impeded by the presence of significant accumulations of boric acid deposits. Please answer the following:

- a. Does Mr. Geisen contend that during 11 RFO and/or 12 RFO Davis-Besse's access to the bare metal head was not impeded by boric acid deposits? If so, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- b. In the event that Mr. Geisen contends that access to the bare metal head was impeded during the 11 RFO and/or the 12 RFO, describe with specificity the nature and extent of the conditions which impeded access. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.

- c. In the event that Mr. Geisen contends that access to the bare metal head was impeded during the 11 RFO and/or the 12 RFO, does Mr. Geisen contend all facts regarding the existence of conditions which impeded access were disclosed in Serial 2731? If so, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- d. In the event that Mr. Geisen contends that access to the bare meal head was impeded during the 11 RFO and/or 12 RFO, and facts regarding the conditions which impeded access were not disclosed in Serial 2731, specifically identify each fact that was not disclosed. With respect to each such fact, state whether Mr. Geisen contends that the fact was or was not relevant or material to Bulletin 2001-01. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- e. For each nondisclosed fact identified in d. above, state whether Mr. Geisen contends that the nondisclosed fact was irrelevant or immaterial to Bulletin 2001-01. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- f. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that he was cognizant of the fact when Serial 2731 was issued? If not, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- g. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that those facts were previously or contemporaneously disclosed to the NRC through other means? If so, for each non-disclosed fact describe the means by which the information was provided to the NRC, including but not limited to, (1) whether the information was communicated orally, visually or in writing, (2) the individuals to whom the information was provided, and (3) the date on which the information was provided. Specifically describe all communications by which each fact was communicated to the NRC, and identify all notes, written documents, e-mails, calender references or other information documenting those communications. Additionally, specifically state all other legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- h. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that the failure to disclose those facts was corrected in a timely fashion by subsequent submissions and/or presentations? If so, for

each non-disclosed fact describe the means by which the information was provided to the NRC, including but not limited to, (1) whether the information was communicated orally, visually or in writing, (2) the individuals to whom the information was provided, and (3) the date on which the information was provided. Specifically describe all communications by which each fact was communicated to the NRC, and identify all notes, written documents, e-mails, calendar references or other information documenting those communications. Additionally, specifically state all other legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.

INTERROGATORY 18

Paragraph 17 of our Order states that Mr. Geisen concurred on Serial 2731 although he knew that the response was materially incomplete and inaccurate in that Serial 2731 failed to indicate that the presence of boric acid deposits was not limited to the area beneath supposedly leaking control rod drive mechanism (CRDM) flanges. Please answer the following:

- a. Does Mr. Geisen contend that the presence of boric acid deposits on the RPV head was not limited to the area directly beneath supposedly leaking CRDM flanges? If so, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- b. In the event that Mr. Geisen contends that boric acid deposits on the RPV head were not limited to the area directly beneath supposedly leaking CRDM flanges, describe with specificity the extent to which boric acid deposits on the RPV head were not directly beneath leaking CRDM flanges. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- c. In the event that Mr. Geisen contends that boric acid deposits on the RPV head were not limited to the area directly beneath supposedly leaking CRDM flanges, does Mr. Geisen contend all facts regarding this discrepancy were disclosed in Serial 2731? Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- d. In the event that Mr. Geisen contends that boric acid deposits on the RPV head were not limited to the area directly beneath supposedly leaking CRDM flanges, and facts regarding this were not disclosed in Serial 2731, specifically identify each fact that was not disclosed. With respect to each such fact, state whether Mr. Geisen contends that the fact was or was not relevant or material to Bulletin 2001-01. Specifically

state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.

- e. For each nondisclosed fact identified in d. above, state whether Mr. Geisen contends that the nondisclosed fact was irrelevant or immaterial to Bulletin 2001-01. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- f. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that he was cognizant of the fact when Serial 2731 was issued? If not, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- g. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that those facts were previously or contemporaneously disclosed to the NRC through other means? If so, for each non-disclosed fact describe the means by which the information was provided to the NRC, including but not limited to, (1) whether the information was communicated orally, visually or in writing, (2) the individuals to whom the information was provided, and (3) the date on which the information was provided. Specifically describe all communications by which each fact was communicated to the NRC, and identify all notes, written documents, e-mails, calendar references or other information documenting those communications. Additionally, specifically state all other legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals that support Mr. Geisen's contention.
- h. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that the failure to disclose those facts was corrected in a timely fashion by subsequent submissions and/or presentations? If so, for each non-disclosed fact describe the means by which the information was provided to the NRC, including but not limited to, (1) whether the information was communicated orally, visually or in writing, (2) the individuals to whom the information was provided, and (3) the date on which the information was provided. Specifically describe all communications by which each fact was communicated to the NRC, and identify all notes, written documents, e-mails, calendar references or other information documenting those communications. Additionally, specifically state all other legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals that support Mr. Geisen's contention.

INTERROGATORY 19

Paragraph 17 of our Order states that Mr. Geisen concurred on Serial 2731 although he knew that the response was materially incomplete and inaccurate in that Serial 2731 failed to indicate that the build-up of boric acid deposits was so significant that the licensee could not inspect all of the RPV head penetration nozzles. Please answer the following:

- a. Does Mr. Geisen contend that the build-up of boric acid deposits was not so significant that the licensee could not inspect all of the RPV head penetration nozzles? If so, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- b. In the event that Mr. Geisen contends that the build-up of boric acid deposits was so significant that the licensee could not inspect all of the RPV head penetration nozzles, describe with specificity the extent to which inspections of the nozzles were so limited. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- c. In the event that Mr. Geisen contends that the build-up of boric acid deposits was so significant that the licensee could not inspect all of the RPV head penetration nozzles, does Mr. Geisen contend all facts regarding this were disclosed in Serial 2731? Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- d. In the event that Mr. Geisen contends that the build-up of boric acid deposits was so significant that the licensee could not inspect all of the RPV head penetration nozzles, specifically identify each limitation on inspections that was not disclosed. With respect to each such fact, state whether Mr. Geisen contends that the fact was or was not relevant or material to Bulletin 2001-01. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- e. For each nondisclosed fact identified in d. above, state whether Mr. Geisen contends that the nondisclosed fact was irrelevant or immaterial to Bulletin 2001-01. Specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.
- f. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that he was cognizant of the fact when Serial 2731 was issued?

If not, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals in support of Mr. Geisen's contention.

- g. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that those facts were previously or contemporaneously disclosed to the NRC through other means? If so, for each non-disclosed fact describe the means by which the information was provided to the NRC, including but not limited to, (1) whether the information was communicated orally, visually or in writing, (2) the individuals to whom the information was provided, and (3) the date on which the information was provided. Specifically describe all communications by which each fact was communicated to the NRC, and identify all notes, written documents, e-mails, calendar references or other information documenting those communications. Additionally, specifically state all other legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals that support Mr. Geisen's contention.
- h. For each nondisclosed fact identified in d. above, does Mr. Geisen contend that the failure to disclose those facts was corrected in a timely fashion by subsequent submissions and/or presentations? If so, for each non-disclosed fact describe the means by which the information was provided to the NRC, including but not limited to, (1) whether the information was communicated orally, visually or in writing, (2) the individuals to whom the information was provided, and (3) the date on which the information was provided. Specifically describe all communications by which each fact was communicated to the NRC, and identify all notes, written documents, e-mails, calendar references or other information documenting those communications. Additionally, specifically state all other legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals that support Mr. Geisen's contention.

INTERROGATORY 20

With respect to the October 3, 2001, conference call with the NRC Staff, please answer the following:

- a. The agenda for the conference call states, in part, "Further confirmation of no indication of leakage attributable to CRDM nozzle leakage clearly CRDM flange leakage." Does Mr. Geisen contend that this statement accurately represents all of the factual information available at the time regarding the source of leakage causing boron deposits on the RPV head? If so, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals that support Mr. Geisen's contention. If not, state which facts known at that time were indicative of nozzle rather than

flange leakage.

- b. Did Mr. Geisen make any statements during the conference call regarding the extent of the RPV which had been inspected during RFO 12? If so, identify what statements Mr. Geisen made and the legal and factual bases for those statements. Identify all facts, documents, and knowledgeable individuals relevant to Mr. Geisen's statements.
- c. Does Mr. Geisen contend that videos from 10 RFO, 11 RFO, and 12 RFO confirmed that there was no CRDM nozzle leakage? If so, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals that support Mr. Geisen's contention.
- d. During the October 3, 2001, conference call, did Mr. Geisen communicate to the NRC that videos from 10 RFO, 11 RFO, and 12 RFO confirmed that there was no CRDM nozzle leakage? If so, did Mr. Geisen believe that statement to be true? In the event that Mr. Geisen contends he made the statement and believed it to be true, specifically state all legal and factual bases for Mr. Geisen's contention and specifically identify any facts, documents, and knowledgeable individuals that support Mr. Geisen's contention. In the event that Mr. Geisen made the statement and did not believe it to be true, describe with specificity Mr. Geisen's actual belief of the findings of the referenced videos and state all legal and factual bases for Mr. Geisen's belief, including the specific facts, documents, and knowledgeable individuals Mr. Geisen based that belief on.

INTERROGATORY 21

With respect to the October 11, 2001, briefing of the Commissioners' TAs (referenced in paragraph 20 of the Order), please answer the following:

- a. Was Mr. Geisen a presenter during the briefing? If so, was he the only presenter? If he was not the only presenter, identify what portions of the presentation he was responsible for and what portions he was not (include references to specific slides). Identify all other individuals who made presentations at the meeting and the portions of the presentation of which they were responsible.
- b. Describe in detail Mr. Geisen's written and oral presentation at the meeting and identify all materials presented at the meeting, including all slides, videos or other materials.
- c. With respect to Presentation Slide 6 presented at the meeting, answer the following:
 - i. Did Slide 6 state, in part: "Conducted and recorded video inspections of the head during 11 RFO (April 1998) and 12 RFO

- (April 2000) - No head penetration leakage was identified.” If not, state Mr. Geisen’s understanding of the entire contents of that slide.
- ii. Did Mr. Geisen present that slide? If not, state who, if anyone, presented that slide.
 - iii. Does Mr. Geisen contend that he had knowledge of all of the facts underlying the information presented in the slide? If not, state with specificity those facts for which Mr. Geisen had no knowledge or had incomplete knowledge. If his knowledge was incomplete, describe with specificity the extent of his knowledge of the facts and the facts and documents which supported his knowledge.
 - iv. Does Mr. Geisen contend that the information in slide 6 was an accurate description of results of the 11 RFO and 12 RFO? If so, state all factual and legal bases for Mr. Geisen’s contention and identify all facts, documents, and knowledgeable individuals supporting Mr. Geisen’s contention. If not, state with specificity in what respects the representation on the slide was inaccurate.
 - v. To the extent that Mr. Geisen contends that this presentation slide was incomplete or inaccurate, does Mr. Geisen contend any deficiency was timely corrected? If so, state the means by which the correction was made to the NRC, including a description of the manner in which it was made, the date on which it was corrected, and the individuals to whom the correction was communicated.
 - vi. To the extent that this presentation slide was incomplete or inaccurate, does Mr. Geisen contend that the incompleteness or inaccuracy was not relevant or material to the NRC determination as to whether to allow operation of Davis Besse beyond December 31, 2001? If so, state all legal and factual bases for Mr. Geisen’s contention and identify all facts, documents, and knowledgeable individuals supporting Mr. Geisen’s contention.
 - vii. To the extent that this presentation slide was incomplete or inaccurate, does Mr. Geisen contend that he was unaware of the incompleteness or inaccuracy? If so, state all legal and factual bases for Mr. Geisen’s contention and identify all facts, documents, and knowledgeable individuals supporting Mr. Geisen’s contention.
- d. With respect to Presentation Slide 7, as presented by FENOC, answer the following:
- i. Did Presentation Slide 7, as presented, state, in part: “All CRDM [control rod drive mechanism] penetrations were verified to be free from “popcorn” type boron deposits using video recordings from 11 RFO or 12 RFO.”
 - ii. Did Mr. Geisen present that slide? If not, state who presented that slide.
 - iii. Does Mr. Geisen contend that he had knowledge of all of the

- facts underlying the information presented in the slide? If not, state with specificity those facts for which Mr. Geisen had no knowledge or had incomplete knowledge. If his knowledge was incomplete, describe with specificity the extent of his knowledge of the facts and the facts and documents which supported his knowledge.
- iv. Does Mr. Geisen contend that the statement quoted above was an accurate and complete description of the condition of the CRDM penetrations? If so, state all factual and legal bases for Mr. Geisen's contention and identify all facts, documents, and knowledgeable individuals supporting Mr. Geisen's contention. If not, state with specificity in what respects the representation on the slide was inaccurate.
 - v. To the extent that Mr. Geisen contends that this presentation slide was incomplete or inaccurate, does Mr. Geisen contend any deficiency was timely corrected? If so, state the means by which the correction was made to the NRC, including a description of the manner in which it was made, the date on which it was corrected, and the individuals to whom the correction was communicated.
 - vi. To the extent that this presentation slide was incomplete or inaccurate, does Mr. Geisen contend that the incompleteness or inaccuracy was not relevant or material to the NRC determination as to whether to allow operation of Davis Besse beyond December 31, 2001? If so, state all legal and factual bases for Mr. Geisen's contention and identify all facts, documents, and knowledgeable individuals supporting Mr. Geisen's contention.
 - vii. To the extent that this presentation slide was incomplete or inaccurate, does Mr. Geisen contend that he was unaware of the incompleteness or inaccuracy? If so, state all legal and factual bases for Mr. Geisen's contention and identify all facts, documents, and knowledgeable individuals supporting Mr. Geisen's contention.
- e. With respect to Mr. Geisen's knowledge at the time of the October 11 meeting with the Commissioners' TAs,
- i. Does Mr. Geisen contend that he was not aware that some of the RPV head penetration nozzles could not be inspected in 11 RFO and 12 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - ii. Does Mr. Geisen contend that this inability to inspect all nozzles was not due to significant boric acid deposits on the head? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- f. Identify all persons, including Mr. Geisen if applicable, who either made

suggestions concerning, provided input for, made comments on, or drafted, Presentation Slide 6 and/or 7 for the October 11 meeting with the NRC. For each person identified, state that person's role with respect to each specific slide.

INTERROGATORY 22

As referenced in paragraph 23 of the Order, Serial 2735, submitted on October 17, 2001, stated that 45 of 69 nozzles were viewed in 12 RFO. Please answer the following:

- a. Does Mr. Geisen contend that 45 of 69 nozzles could be viewed in 12 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- b. Does Mr. Geisen contend that at the time that Serial 2735 was submitted, Davis-Besse had a basis for claiming that 45 of 69 nozzles could be viewed in 12 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- c. Does Mr. Geisen contend that Serial 2735 accurately and completely stated that 45 of 69 nozzles could be viewed in 12 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- d. Identify all persons, including Mr. Geisen if applicable, who either made suggestions concerning, provided input for, made comments on, or drafted, the above language in Serial 2735. For each person identified, state that person's role with respect to the above language.
- e. To the extent that Serial 2735 did inaccurately or incompletely state that 45 of 69 nozzles could be viewed in 12 RFO:
 - i. Does Mr. Geisen contend that he was not aware at the time the Serial was submitted that the statement was incomplete or inaccurate? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - ii. Does Mr. Geisen contend that he was not aware that the statement was in Serial 2735? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iii. Does Mr. Geisen contend that the statement was timely corrected by later submissions or presentations? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iv. Does Mr. Geisen contend that the statement was not material to the NRC? If so, state all legal and factual bases for Mr. Geisen's

- contention and identify any documents or testimony in support of Mr. Geisen's contention.
- f. To the extent not identified above, identify all videos/photos/documents reviewed by, all persons consulted by, and all actions taken by Mr. Geisen in doing any of the following:
- i. drafting, reviewing, understanding, or commenting on statements concerning the number of nozzles that had been viewed in 12 RFO;
 - ii. checking, correcting, determining, or assisting in determining the number of nozzles had been viewed in 12 RFO.

INTERROGATORY 23

As referenced in paragraph 23 of the Order, Serial 2735, submitted on October 17, 2001, stated that 50 of 69 nozzles were viewed in 11 RFO. Please answer the following:

- a. Does Mr. Geisen contend that 50 of 69 nozzles could be viewed in 11 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- b. Does Mr. Geisen contend that at the time that Serial 2735 was submitted, Davis-Besse had a basis for claiming that 50 of 69 nozzles could be viewed in 11 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- c. Does Mr. Geisen contend that Serial 2735 accurately and completely stated that 50 of 69 nozzles could be viewed in 11 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- d. Identify all persons, including Mr. Geisen if applicable, who either made suggestions concerning, provided input for, made comments on, or drafted, the above language in Serial 2735. For each person identified, state that person's role with respect to the above language.
- e. To the extent that Serial 2735 did inaccurately or incompletely state that 50 of 69 nozzles could be viewed in 11 RFO:
 - i. Does Mr. Geisen contend that he was not aware at the time the Serial was submitted that the statement was incomplete or inaccurate? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - ii. Does Mr. Geisen contend that Mr. Geisen was not aware that the statement was in Serial 2735? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.

- iii. Does Mr. Geisen contend that the statement was timely corrected by later submissions or presentations? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- iv. Does Mr. Geisen contend that the statement was not material to the NRC? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- f. To the extent not identified above, identify all videos/photos/documents reviewed by, all persons consulted by, and all actions taken by Mr. Geisen in doing any of the following:
 - i. drafting, reviewing, understanding, or commenting on statements concerning the number of nozzles that had been viewed in 11 RFO;
 - ii. checking, correcting, determining, or assisting in determining the number of nozzles had been viewed in 11 RFO.

INTERROGATORY 24

As referenced in paragraph 23 of the Order, Serial 2735, submitted on October 17, 2001, stated that 65 of 69 nozzles were viewed in 10 RFO. Please answer the following:

- a. Does Mr. Geisen contend that 65 of 69 nozzles could be viewed in 10 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- b. Does Mr. Geisen contend that at the time that Serial 2735 was submitted, Davis-Besse had a basis for claiming that 65 of 69 nozzles could be viewed in 10 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- c. Does Mr. Geisen contend that Serial 2735 accurately and completely stated that 65 of 69 nozzles could be viewed in 10 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- d. Identify all persons, including Mr. Geisen if applicable, who either made suggestions concerning, provided input for, made comments on, or drafted, the above language in Serial 2735. For each person identified, state that person's role with respect to the above language.
- e. To the extent that Serial 2735 did inaccurately or incompletely state that 65 of 69 nozzles could be viewed in 10 RFO:
 - i. Does Mr. Geisen contend that he was not aware at the time the Serial was submitted that the statement was incomplete or inaccurate? If so, state all legal and factual bases for Mr.

- Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- ii. Does Mr. Geisen contend that he was not aware that the statement was in Serial 2735? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iii. Does Mr. Geisen contend that the statement was timely corrected by later submissions or presentations? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iv. Does Mr. Geisen contend that the statement was not material to the NRC? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- f. To the extent not identified above, identify all videos/photos/documents reviewed by, all persons consulted by, and all actions taken by Mr. Geisen in doing any of the following:
- i. drafting, reviewing, understanding, or commenting on statements concerning the number of nozzles that had been viewed in 10 RFO;
 - ii. checking, correcting, determining, or assisting in determining the number of nozzles had been viewed in 10 RFO.

INTERROGATORY 25

As referenced in paragraph 24 of the Order, Note 1 of Attachment 2 of Serial 2735, submitted on October 17, 2001, stated, "In 1996 during 10 RFO, the entire RPV head was inspected. Since the video was void of head orientation narration, each specific nozzle view could not be correlated." Please answer the following:

- a. Does Mr. Geisen contend that the entire RPV head was inspected in 10 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- b. Does Mr. Geisen contend that at the time that Serial 2735 was submitted, Davis-Besse had a basis for claiming that the entire head had been inspected in 10 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- c. Does Mr. Geisen contend that Serial 2735 accurately and completely stated that the entire head had been inspected in 10 RFO? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- d. Identify all persons, including Mr. Geisen if applicable, who either made suggestions concerning, provided input for, made comments on, or

drafted, the above-quoted language in Note 1 of Attachment 2 of Serial 2735. For each person identified, state that person's role with respect to the above-quoted language.

- e. To the extent that Serial 2735 did inaccurately or incompletely state that the entire head had been inspected in 10 RFO:
 - i. Does Mr. Geisen contend that he was not aware at the time the Serial was submitted that the statement was incomplete or inaccurate? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - ii. Does Mr. Geisen contend that he was not aware that the statement was in Serial 2735? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iii. Does Mr. Geisen contend that the statement was timely corrected by later submissions or presentations? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iv. Does Mr. Geisen contend that the statement was not material to the NRC? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- f. To the extent not identified above, identify all videos/photos/documents reviewed by, all persons consulted by, and all actions taken by Mr. Geisen in doing any of the following:
 - i. drafting, reviewing, understanding, or commenting on statements concerning the amount of the RPV head that had been inspected in 10 RFO;
 - ii. checking, correcting, determining, or assisting in determining the amount of the RPV head that had been inspected in 10 RFO.

INTERROGATORY 26

As referenced in paragraph 24 of the Order, Attachment 2 of Serial 2735, submitted on October 17, 2001, stated that 24 CRDM nozzles in 12 RFO had a CRDM flange leak evident. Please answer the following:

- a. Does Mr. Geisen contend that this statement did not indicate that 24 CRDM flanges were leaking onto nozzles? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- b. Does Mr. Geisen contend that the inspections from 12 RFO indicated that 24 CRDM flanges were leaking? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.

- c. Does Mr. Geisen contend that Serial 2735 accurately and completely stated that 24 CRDM nozzles in 12 RFO had a flange leak evident? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- d. Identify all persons, including Mr. Geisen if applicable, who either made suggestions concerning, provided input for, made comments on, or drafted, the above language in Attachment 2 of Serial 2735. For each person identified, state that person's role with respect to the above language.
- e. To the extent that Serial 2735 did incompletely or inaccurately state that 24 CRDM nozzles in 12 RFO had a flange leak evident:
 - i. Does Mr. Geisen contend that he was not aware at the time the Serial was submitted that the statement was incomplete or inaccurate? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - ii. Does Mr. Geisen contend that he was not aware that the statement was in Serial 2735? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iii. Does Mr. Geisen contend that the statement was timely corrected by later submissions or presentations? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iv. Does Mr. Geisen contend that the statement was not material to the NRC? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.

INTERROGATORY 27

With respect to the allegations made by the NRC Staff in paragraph 27 of its Order regarding the October 30, 2001, submission of Serial 2744, please answer the following:

- a. Does Mr. Geisen contend that the RPV head images did not omit images of the significant boric acid accumulations present on the RPV head? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- b. To the extent that the RPV head images did omit images of the significant boric acid accumulations present on the RPV head,
 - i. Does Mr. Geisen contend that such an omission would not be incomplete or inaccurate? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.

- ii. Does Mr. Geisen contend that he was not aware at the time the Serial was submitted of the omission? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iii. Does Mr. Geisen contend that he was not aware that the images were submitted in Serial 2744? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iv. Does Mr. Geisen contend that any misimpressions caused by the omitted images were timely corrected by later submissions or presentations? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - v. Does Mr. Geisen contend that the omitted images were not material to the NRC? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- c. Does Mr. Geisen contend that there were no RPV head nozzle images that were mislabeled to indicate that the images were of a different RPV head nozzle than actually presented in the image? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention. If Mr. Geisen does not so contend, identify the RPV head nozzles images that were so mislabeled.
- d. Does Mr. Geisen contend that there were no RPV head nozzle images that were merely copies of other images with labels changed? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention. If Mr. Geisen do not so contend, identify the RPV head nozzles images that were so mislabeled.
- e. To the extent that any RPV head images were mislabeled to indicate that the images were of a different RPV head nozzle than actually presented in the image,
 - i. Does Mr. Geisen contend that such a mislabeling would not be incomplete or inaccurate? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - ii. Does Mr. Geisen contend that he was not aware at the time the Serial was submitted of the mislabeling? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
 - iii. Does Mr. Geisen contend that any misimpressions caused by the mislabelled images were timely corrected by later submissions or presentations? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in

- support of Mr. Geisen's contention.
- iv. Does Mr. Geisen contend that the mislabeled images were not material to the NRC? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.

INTERROGATORY 28

With respect to the presentation Mr. Geisen made to the Advisory Committee on Reactor Safeguards (ACRS) on November 9, 2001, referenced in paragraph 28 of the Order, please answer the following:

- a. Does Mr. Geisen contend that the transcript for the meeting (NRC028-0215 to -0235) is not an accurate representation of Mr. Geisen's presentation to the ACRS? If so, state all legal and factual bases for Mr. Geisen's contention, specifically identifying all portions of the transcript Mr. Geisen claims to be an inaccurate representation. For each inaccurate representation identified, identify in what ways that representation is inaccurate and provide Mr. Geisen's view of what an accurate representation would be. Also, identify any documents or testimony in support of Mr. Geisen's contention.
- b. Does Mr. Geisen contend that he was not aware that members of the NRC Staff were present for the presentation? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- c. For each of the statements below, does Mr. Geisen contend that he did not make that statement to the ACRS at the November 9 meeting? Give an answer for each statement. For each instance in which Mr. Geisen contends that he did not make a particular statement, give all legal and factual bases for Mr. Geisen's contention, and identify any documents or testimony in support of Mr. Geisen's contention.
 - i. Mr. Geisen stated that the 11 RFO (1998) and 12 RFO (2000) inspections were focused on inspecting the RPV for indications of the impact of boric acid leakage from leaking flanges.
 - ii. Mr. Geisen stated that the 1998 and 2000 inspections (video tapes) did not give a good view of the control rod drives because the camera angle was looking upwards at the structural material of the service structure on top of the head.
 - iii. Mr. Geisen stated that the video tape of the 10 RFO (1996) inspection was a better video because the camera was following around a vacuum and probe that were specifically looking for head wastage as a result of boron deposits on the head.
- d. For the statements identified in b., to the extent Mr. Geisen made them, please answer the following:
 - i. Does Mr. Geisen contend that any of them are not incomplete or

- inaccurate? If so, identify which statements are not incomplete or inaccurate, state all legal and factual bases for contending that those statements are not incomplete or inaccurate, and identify any documents or testimony in support of Mr. Geisen's contention.
- ii. Does Mr. Geisen contend, to the extent any of them are incomplete or inaccurate, that Mr. Geisen was not aware of the incompleteness or inaccuracy? If so, identify all legal and factual bases for Mr. Geisen's contention for each statement and identify any documents or testimony in support of Mr. Geisen's contention.
 - iii. Does Mr. Geisen contend, to the extent any of them are incomplete or inaccurate, that they were later timely corrected by subsequent presentations or submissions? If so, identify the specific basis for Mr. Geisen's contention for each statement and identify any documents or testimony in support of Mr. Geisen's contention.
 - iv. Does Mr. Geisen contend, to the extent any of them are incomplete or inaccurate, that they were not material to the NRC? If so, identify the specific basis for Mr. Geisen's contention for each statement and identify any documents or testimony in support of Mr. Geisen's contention.
- e. Does Mr. Geisen contend that not all of the video tapes were helpful in understanding the significant boron accumulations present at the start of each outage? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- f. Does Mr. Geisen contend that not all of the video tapes were helpful in understanding the the clear impediments to 100% inspection of the RPV head nozzles? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.
- g. Does Mr. Geisen contend that not all of the video tapes were helpful in understanding the difficulty the licensee encountered in its attempts to fully clean the RPV head of boron or to complete a comprehensive inspection of the RPV head nozzles? If so, state all legal and factual bases for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's contention.

INTERROGATORY 29

With respect to Mr. Geisen's concurrence on the review and approval sheets ("green sheets") for Serial 2731 (submitted September 4, 2001), Serial 2735 (submitted October 17, 2001), and Serial 2744 (submitted October 30, 2001), [all found in NRC027-1692 to -1703] please answer the following questions:

- a. Did Mr. Geisen place his signature in Block 14 of a review and approval sheet for each serial listed above? If not, specify for which Serials Mr. Geisen's signature was not in Block 14 of the sheet, and give the factual basis for Mr. Geisen's denial.
- b. Does Mr. Geisen contend that on each review and approval sheet for the above Serials, the following language did not appear: "BLOCK 14 REVIEW AND APPROVAL - Initiator checks and /or enters the desired reviewer(s) . The technical accuracy of a response to the NRC is the responsibility of the Director and Management individual assigned the action." If so, specify for which Serials this language did not appear on the review and approval sheet, and give the factual basis for Mr. Geisen's denial.
- c. Does Mr. Geisen contend that on a review and approval sheet for Serial 2731, he was not listed as "Design Engineering Manager?" If so, give the factual basis for Mr. Geisen's contention and identify any documents or testimony in support of Mr. Geisen's denial.
- d. Does Mr. Geisen contend that on a review and approval sheet for Serial 2731, he did not concur for Steven Moffitt, the signature being dated August 30, 2001, with Steven Moffitt was listed as "Director, Technical Services?" If so, specifically state the factual and legal basis for Mr. Geisen's contention and identify any facts, documents, or testimony in support of Mr. Geisen's contention.
- e. Does Mr. Geisen contend that he was not a manager responsible for the technical accuracy of Serial 2731? If so, specifically state the factual and legal basis for Mr. Geisen's contention and identify any facts, documents, or testimony in support of Mr. Geisen's contention.
- f. Does Mr. Geisen contend that on a review and approval sheet for Serial 2735, he was not listed as "Responsible Manager?" If so, specifically state the factual and legal basis for Mr. Geisen's contention and identify any facts, documents, or testimony in support of Mr. Geisen's contention.
- g. Does Mr. Geisen contend that he was not a manager responsible for the technical accuracy of Serial 2735? If so, specifically state the factual and legal basis for Mr. Geisen's contention and identify any facts, documents, or testimony in support of Mr. Geisen's contention.
- h. Does Mr. Geisen contend that on a review and approval sheet for Serial 2744, he was not listed as "Manager, Design Engineering," and were the only engineering manager listed on a review and approval sheet for that Serial? If so, specifically state the factual and legal basis for Mr. Geisen's contention and identify any facts, documents, or testimony in support of Mr. Geisen's contention.

- i. Does Mr. Geisen contend that he was not a manager responsible for the technical accuracy of Serial 2744? If so, specifically state the factual and legal basis for Mr. Geisen's contention and identify any facts, documents, or testimony in support of Mr. Geisen's contention.

INTERROGATORY 30

Did Guy Campbell, Steven Moffitt, or anyone else direct Mr. Geisen to view videos/photos/documentation from past inspections of the RPV head in the Fall of 2001? If so, for each direction, specifically identify (1) the date the direction was received; (2) whether the direction concerned videos, photos, and/or documentation; and (3) which outage(s) the direction concerned.

INTERROGATORY 31

Did Guy Campbell, Steven Moffitt, or anyone else direct Mr. Geisen to view videos/photos/documentation from past inspections of the CRDM flanges in the Fall of 2001? If so, for each direction, specifically identify (1) the date the direction was received; (2) whether the direction concerned videos, photos, and/or documentation; and (3) which outage(s) the direction concerned.

INTERROGATORY 32

Describe Mr. Geisen's education and training with regard to metallurgy, circumferential and axial cracking in CRDM nozzles, boric acid corrosion and boric acid corrosion control, primary water stress corrosion cracking (PWSCC), reactor vessel head inspection methods/procedures at DBNPS and at other plants, including, but not limited to, VT-2 examinations.

INTERROGATORY 33

Identify Mr. Geisen's role(s) in outages during his time at Davis-Besse, including, but not limited to: planning outages (e.g. scheduling maintenance activities), drafting or approving work orders, writing or reviewing CRs, writing or reviewing modification requests, writing or reviewing PCAQRs, writing/reviewing LERs, and/or reviewing photos/videos of inspections. For each role, identify the outage in which Mr. Geisen performed that role.

INTERROGATORY 34

In 1998, it was discovered that reactor coolant system pressure spray valve two (RC-2) was degraded, two of eight carbon-steel body to bonnet nuts had been dissolved by boric acid, and a third was significantly corroded. Describe Mr. Geisen's involvement, if any, in the RC-2 event or its aftermath.

- a. Identify any and all documents that Mr. Geisen drafted, reviewed, or was otherwise made aware of the contents thereof concerning this event.
- b. Identify any training Mr. Geisen received concerning/related to this

event.

- c. Identify any videos or photographs reviewed by Mr. Geisen or of which he was otherwise made aware of concerning this event.

INTERROGATORY 35

DBNPS had boric acid corrosion control (BACC) procedures in 2001 (NG-EN-00324). Please answer the following:

- a. Identify what Mr. Geisen knew about DBNPS' BACC as of August 2001.
- b. Identify any training underwent or information received by Mr. Geisen concerning BACC as of August 2001.
- c. Identify any training underwent or information received by Mr. Geisen concerning BACC between August 1, 2001, and November 30, 2001, and when he received that information and/or training.

INTERROGATORY 36

Identify Mr. Geisen's knowledge of/familiarity with NRC Generic Letter 97-01 "Degradation of Control Rod Drive Mechanisms Nozzle and other Vessel Closure Head Penetrations." In so doing, identify the extent of Mr. Geisen's knowledge of/familiarity, and when that knowledge of/familiarity was acquired.

INTERROGATORY 37

Describe Mr. Geisen's involvement with reports and/or meetings of industry groups concerning CRDM nozzle cracking and/or boric acid corrosion. Identify each report Geisen contributed to and/or reviewed, every meeting Geisen attended, and the topics covered by the aforementioned reports/meetings.

INTERROGATORY 38

Did Mr. Geisen at any time question, or have concerns about, the completeness or accuracy of any of the information presented to the NRC in any the following submissions or presentations: Serial 2731; Serial 2735; Serial 2744; the October 3, 2001 teleconference with the NRC Staff; the October 11, 2001 briefing of the Commissioners' TAs; and/or the November 9 presentation to the ACRS? If so, please do the following:

- a. Identify every presentation or submission for which there were questions or concerns.
- b. For each presentation and submission identified, identify every question or concern Mr. Geisen had. For each question or concern,
 - i. Identify any person or persons to whom he addressed his concern/question;

- ii. Explain how Mr. Geisen's concern/question was resolved to his satisfaction. If his concern/question was not resolved to his satisfaction, explain why not.

If Mr. Geisen never questioned, or had concerns about the completeness or accuracy of information presented to the NRC in the aforementioned presentations and submissions, explain why.

INTERROGATORY 39

Describe Mr. Geisen's knowledge of the RPV service structure.

- a. Describe Mr. Geisen's knowledge of Mod 94-0025 and Mr. Geisen's knowledge of plans/requests to cut larger mouse/weep holes in the service structure in general. Specifically, describe Mr. Geisen's knowledge as to why plans to cut larger holes were repeatedly postponed.
- b. Identify all meetings, discussions, and/or communications in which Mr. Geisen took part and in which the service structure was discussed.
- c. Identify all communications Mr. Geisen had concerning the service structure during his career at Davis-Besse.
- d. Did Mr. Geisen know in the Fall of 2001 that Davis-Besse and ANO-1 were the only B&W plants that had not cut larger holes in the service structure for cleaning and inspection? If not, why? If he learned later, identify when and how.
- e. Was Mr. Geisen aware of a May 8, 1996 white paper by Prasoan Goyal concerning reactor vessel nozzle cracking (NRC028-1295 to NRC028-1330)? If so, when did he first become aware of it?

INTERROGATORY 40

Identify all changes, and all suggestions for changes, made by Mr. Geisen or any other person to documents/materials prepared for FENOC's presentation to Senator Voinovich's Staff in October 2001, including, but not limited to, presentation slides and draft presentation slides prepared for those briefings. For each suggestion or change:

- a. identify who made the change or suggestion and why the suggestion or change was made;
- b. identify the document/material to which the suggestion or change pertained;
- c. identify Mr. Geisen's role, if any, either in making the suggestion or change, or responding to the suggestion or change;

- d. Explain why the suggestion or change was made;
- e. Describe Mr. Geisen's thoughts concerning whether the suggestion or change should be followed; and
- f. state whether the change appears in the final version of the materials prepared for and/or used during the presentation to Senator Voinovich's Staff.

INTERROGATORY 41

Identify all changes, and all suggestions for changes, made by Mr. Geisen or any other person to documents/materials prepared for FENOC's presentation to the Commissioner's TAs in October 2001, including, but not limited to, presentation slides and draft presentation slides prepared for those briefings. For each suggestion or change:

- a. identify who made the change or suggestion and why the suggestion or change was made;
- b. identify the document/material to which the suggestion or change pertained;
- c. identify Mr. Geisen's role, if any, either in making the suggestion or change, or responding to the suggestion or change;
- d. Explain why the suggestion or change was made;
- e. Describe Mr. Geisen's thoughts concerning whether the suggestion or change should be followed; and
- f. state whether the change appears in the final version of the materials prepared for and/or used during the presentation to the Commissioners' TAs.

DOCUMENT REQUESTS

Produce all documents requested below, bates-stamped for identification purposes.

Provide an index of any documents released pursuant to the requests below, which index is to include the following information: the date of the document, the beginning and ending bates numbers of the document, and a title or brief description of what the document is. For all redactions to produced documents, list all claimed privileges or other objections to producing the redacted portions, and give sufficient information for assessing the claim of privilege or protected status of the redacted portion. For each document falling under the request for which you claim a privilege, or otherwise object to producing, identify the date of the document, list all claimed privileges or other objections to producing the document, and give sufficient information for assessing the claim of privilege or the protected status of the document. Do not produce documents that have already been turned over to you by the NRC Staff during this enforcement hearing.

DOCUMENT REQUEST 1

Produce all documents that are relevant to any of the items below or that could possibly lead to information relevant to any of the items below. For each document indicate which item(s) the document is relevant to. Also, unless otherwise specified, items requesting information on Mr. Geisen's knowledge of a fact(s) refers to knowledge he acquired at any time up to and including the time of the discovery of the Davis-Besse reactor vessel head degradation.

- a. The existence, extent, location, and/or color of boric acid left on the Reactor Vessel Head after any refueling outage at Davis-Besse prior to 2002 (including but not limited to, 10 RFO, 11 RFO, and/or 12 RFO) and/or Mr. Geisen's knowledge of any of these facts.
- b. The existence, extent, location, and/or color of boric acid found on the Reactor Vessel Head during inspections of Reactor Vessel Head in any refueling outage at Davis-Besse prior to 2002 (including but not limited to, 10 RFO, 11 RFO, and/or 12 RFO) and/or Mr. Geisen's knowledge of any of these facts.
- c. The existence, amount, and/or identity of Control Rod Drive Mechanism

(CRDM) nozzles that could not be inspected during any refueling outage at Davis-Besse prior to 2002 (including but not limited to, 10 RFO, 11 RFO, and/or 12 RFO) and/or Mr. Geisen's knowledge of any of these facts.

- d. Any obstacles or difficulties (including surmountable ones) to inspection of the Reactor Vessel Head (and/or the CRDM nozzles) in any refueling outage at Davis-Besse prior to 2002 (including but not limited to, 10 RFO, 11 RFO, and/or 12 RFO) and/or Mr. Geisen's knowledge of any of these facts.
- e. The existence, amount, and/or identity of CRDM flanges that were identified as leaking during, or were repaired during, any refueling outage at Davis-Besse prior to 2002 (including but not limited to, 10 RFO, 11 RFO, and/or 12 RFO) and/or Mr. Geisen's knowledge of any of these facts.
- f. The activities performed in inspections or cleanings of the Reactor vessel head during any refueling outage at Davis-Besse prior to 2002 (including but not limited to, 10 RFO, 11 RFO, and/or 12 RFO) and/or Mr. Geisen's knowledge of these facts, as well as documentation related to the inspections or cleanings.
- g. The activities performed in inspections of the CRDM flanges during any refueling outage at Davis-Besse prior to 2002 (including but not limited to, 10 RFO, 11 RFO, and/or 12 RFO) and/or Mr. Geisen's knowledge of these facts, as well as documentation related to the inspections.
- h. Mr. Geisen's knowledge of Primary Water Stress Corrosion Cracking (PWSCC)
- i. Mr. Geisen's knowledge of the effects of, the prevention of, and/or the mitigation of boric acid corrosion.
- j. Mr. Geisen's knowledge of cracking in CRDM nozzles.
- k. Mr. Geisen's knowledge of the unidentified Reactor Coolant System Leakage experienced at Davis-Besse.
- l. Mr. Geisen's knowledge of the RC-2 event at Davis-Besse.
- m. Drafting, providing input for, doing technical work for, reviewing, revising, meeting on, communicating about, discussing, commenting on, and/or other actions taken with respect to the following: Serial 2731 and issues related to or covered by Serial 2731.
- n. Drafting, providing input for, doing technical work for, reviewing, revising, meeting on, communicating about, discussing, commenting on, and/or

other actions taken with respect to the following: Serial 2735 and issues related to or covered by Serial 2735.

- o. Drafting, providing input for, doing technical work for, reviewing, revising, meeting on, communicating about, discussing, commenting on, and/or other actions taken with respect to the following: Serial 2741 and issues related to or covered by Serial 2741.
- p. Drafting, providing input for, doing technical work for, reviewing, revising, meeting on, communicating about, discussing, commenting on, Mr. Geisen's actions with respect to, and/or other actions taken with respect to the following: Serial 2744 and issues related to or covered by Serial 2744.
- q. Preparing for, communicating about, preparing slides or agenda for, discussing, meeting on, providing input for, doing technical work for, documents presented during, presentations made during, Mr. Geisen's actions with respect to, and/or other actions taken with respect to the following: the teleconference with the NRC on October 3, 2001, and issues related to or covered in the teleconference.
- r. Preparing for, communicating about, preparing slides or agenda for, discussing, meeting on, providing input for, doing technical work for, documents presented during, presentations made during, Mr. Geisen's actions with respect to, and/or other actions taken with respect to the following: meeting with the Commissioners' TAs on October 11, 2001, and issues related to or covered in the meeting.
- s. Preparing for, communicating about, preparing slides or agenda for, discussing, meeting on, providing input for, doing technical work for, documents presented during, presentations made during, Mr. Geisen's actions with respect to, and/or other actions taken with respect to the following: the presentation made to the ACRS on November 9, 2001, and issues related to or covered in the presentation.
- t. The correction of, updating of, clarifying of, and/or materiality of any of Davis- Besse's statements, impressions, or omissions that are identified by the Order.
- u. Other than the issues identified above, Mr. Geisen's threat, or lack thereof, to the health and safety of the public, involving issues such as his general work history, competence, diligence, and character for truthfulness.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION 1

- a. On August 3, 2001, the NRC issued Bulletin 2001-01, "Circumferential Cracking of Reactor Pressure Vessel Head Penetration Nozzles" (Bulletin).
- b. In the Bulletin, the NRC requested that all holders of operating licenses for pressurized water nuclear power reactors (PWR), including FENOC for the Davis-Besse facility, provide information to the NRC relating to the structural integrity of the reactor pressure vessel (RPV) head penetration nozzles at their respective facilities.
- c. The information requested from the licensees included the following:
 - i. extent of RPV head penetration nozzle leakage and cracking that had been found to date,
 - ii. a description of the inspections and repairs undertaken to satisfy applicable regulatory requirements,
 - iii. and all legal and factual bases for concluding that a licensee's plans for future inspections would ensure compliance with applicable regulatory requirements.
- d. The NRC also required that all Bulletin addressees, including FENOC, submit a written response to the NRC in accordance with the provisions of 10 CFR 50.54(f).
- e. That regulation provides, in part, that upon request of the NRC, an NRC-licensee must submit written statements, signed under oath or affirmation, to enable the NRC to determine whether the license should be modified, suspended, or revoked.

REQUEST FOR ADMISSION 2

- a. On September 4, October 17, and October 30, 2001, the licensee
- b. provided written responses to the Bulletin.
- c. Additionally, the licensee met with the NRC on numerous occasions during October and November of 2001 to provide clarifying information.
- d. The NRC staff allowed the licensee to continue operation of the Davis-Besse facility until February 2002, rather than requiring FENOC to shut the unit down to perform inspections by December 31, 2001, as provided in the Bulletin.
- e. This NRC Staff decision was based, in part, on the information provided by FENOC in its written responses to the Bulletin and during meetings

with the NRC.

REQUEST FOR ADMISSION 3

- a. On February 16, 2002, FENOC shut down Davis-Besse for refueling and inspection of control rod drive mechanism (CRDM) RPV head penetration nozzles.
- b. Using ultrasonic testing, the licensee found cracks in three CRDM RPV head penetration nozzles.
- c. On March 6, 2002, the licensee discovered a cavity in the RPV head in the vicinity of CRDM Penetration Nozzle No. 3.
 - i. The cavity measured approximately 5 to 7 inches long, 4 to 5 inches wide, and penetrated through the 6.63 inch-thick low-alloy steel portion of the RPV head.
 - ii. This cavity left the stainless steel cladding material (measuring 0.202 to 0.314 inches-thick) as the sole reactor coolant system (RCS) pressure boundary.
- d. A smaller cavity was also found near CRDM Penetration Nozzle No. 2.

REQUEST FOR ADMISSION 4

Bulletin 2001-01, item 1.d requested each pressurized water reactor (PWR) licensee, including FENOC for Davis-Besse, to do the following:

- a. Provide a description of the RPV head penetration nozzles and RPV head inspection that were performed at PWRs in the 4 years preceding the date of the Bulletin. This description of the inspection would include the type, scope, qualification requirements, and acceptance criteria.
- b. Provide the findings resulting from the inspections.
- c. Describe any limitations (insulation or other impediments) to accessibility of the bare metal of the RPV head for visual examinations.

REQUEST FOR ADMISSION 5

With regard to the October 10, 2001, meeting with FENOC employees on October 10, 2001, referenced in paragraph 20 of the Order, the meeting was for the purposes of finalizing presentation slides for an October 11, 2001, meeting with the NRC Commissioners' Technical Assistants.

Sincerely,

/RA by Michael Spencer/

Sara E. Brock
Michael A. Spencer
Lisa B. Clark
Counsel for the NRC Staff

Dated at Rockville, MD
This 1st Day of September, 2006

In the Matter of)
)
DAVID GEISEN) Docket No. IA-05-052
)
) ASLBP No.06-845-01-EA
)

Dated at Rockville, Maryland
this 1st day of September, 2006

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

DAVID GEISEN

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)
)
)
)

Docket No. IA-05-052

ASLBP No. 06-845-01-EA

CERTIFICATE OF SERVICE

I hereby certify that copies of "THE NRC STAFF'S INTERROGATORIES, DOCUMENT REQUESTS, AND REQUESTS FOR ADMISSION" and "NOTICE OF APPEARANCE" for Lisa B. Clark in the above captioned proceeding have been served on the following persons by deposit in the United States Mail; through deposit in the Nuclear Regulatory Commission internal mail system as indicated by an asterisk (*); and by electronic mail as indicated by a double asterisk (**) on this 1st day of September, 2006.

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Respectfully submitted,

/RA by Michael Spencer/

Michael A. Spencer
Counsel for NRC Staff