

United States of America  
Nuclear Regulatory Commission

Before the Atomic Safety and Licensing Board

In the Matter of )

The Detroit Edison Company )  
(Enrico Fermi Atomic Power )  
Plant, Unit 2) )

Docket No. 50-341  
(Operating License)



**NRC PUBLIC DOCUMENT ROOM**

CEE Interrogatories to Applicant

Per the Licensing Board order of March 21, 1979, Citizens for Employment and Energy (CEE) requests the Applicant to answer the following interrogatories within the time limits established by aforesaid order.

Such answers shall be under oath, and where such answer makes reference to any other document (including the PSAR), then set forth completely the text of each such reference or attach a copy. As used within these interrogatories, the word "writings" (or words of similar import) shall include all written, typed, printed and photostated matter, including photographs, duplicate originals, carbon copies, Thermofax copies, photostatic copies and other copies thereof, including drafts thereof, in your possession, custody or control, written, made, delivered or received at any time up to and including May 25, 1979, including, but without limiting the generality of the definition, all correspondence, telegrams, memoranda, minutes of meetings, client memoranda, account cards, leases, documents of title, receipts, cancelled checks, bank statements, records of telephone calls, summaries of meetings, agreements, contracts and notes, whether formal or informal.

These interrogatories are not intended to call for writings which are subject to a valid privilege; however, you shall be required to describe generally the writings as to which you may claim privilege in order that opportunity for argument thereon may be had.

Interrogatories

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1. List all incidents of physical intrusion on the plant site from the beginning of construction to the present by unauthorized persons, including any intrusions by persons authorized to be on the plant site, but not in specific areas. For each such intrusion, provide copies of any reports or records made internally, the dates of such intrusions, the person or persons involved in the event, and what steps were taken to prevent further intrusions of that nature. Also list any damage or suspected damage that may have been caused by such intrusions. Provide a copy of any security plans the Applicant uses now or has used previously that was designed to stop unauthorized intrusions. If some of such plans are not in writing, explain why and provide a detailed summary of such plans.
2. Provide a copy of the Applicant's current and any previous Quality Assurance Inspection Program Plans. If at any point, the Nuclear Regulatory Commission or other appropriate body has required a change in such plans or has questioned any portion of the current or previous plans, provide a copy of such

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questions or challenges. List all reinspections done of any and all plant components, particularly including, but not limited to, reinspections of all large and small bore pipe hangers and welds of safety related components. As a result of any inspection or reinspection, has installation or work done in the plant been redone. If so, describe specifically all construction or installation work that has been redone, and whether that redone work has also been reinspected to see if it was done properly.

3. List in detail all quality assurance documents that have ever been kept by Applicant. Have any of those records ever been destroyed, misplaced or lost by Applicant? If so, list all such documents destroyed, misplaced or lost by Applicant, and explain why such documents are no longer available. Has Applicant or its contractors maintained a so-called daily site log that is available for inspection by interested parties or by the Compliance Division of the Nuclear Regulatory Commission? Does Applicant or its contractor maintain "significant deficiency reports" or "Significant deficiency follow-up reports" or documents of a similar nature? If so, are these documents classified as being confidential? If so, why was such a decision made. If not, can one determine, after the fact, whether such "deficiencies" were corrected? Has the Detroit Edison Company and its co-applicants retained responsibility for the establishment and execution of the quality assurance program? If not, provide a copy or portion of the contract between you and such contractor that does have such responsibility.

Has the Detroit Edison company or its contractors ever had supervisory personnel replaced, for whatever reason? If so, list the specific individuals replaced, their job titles, the reason they were replaced and copies of any and all documents related to their dismissal, transfer or voluntary resignation. Has the Detroit Edison Company ever replaced, dismissed or accepted the voluntary resignation of any contractor or subcontractor. If so, explain specifically the contractor or subcontractor replaced, the reason for such replacement, and copies of all documents related to the replacement. Have any of Applicant's contractors ever replaced a subcontractor? If so, state the subcontractor so replaced, the reason for such replacement and copies of all documents related to the replacement. Has Applicant or any of its contractors or subcontractors ever dismissed, laid off or caused the forced resignation of any employee working on the plant site. If so, list all such employees, their date of hire and fire, the reason for their being let go, and copies of all documents related to such dismissal. Has any employee ever complained to Applicant or its contractors or subcontractors about problems with quality assurance at the plant? If so, list the employee making such a complaint, the date of the complaint, any action taken to resolve the complaint, and copies of all documents related to such complaint. Has any employee of the Applicant, its contractors or subcontractors ever been dismissed, laid off or caused to resign because of a complaint related to quality assurance? If so, name the employee, the date of such dismissal, the employee's address at the time of dismissal, the reason stated for such dismissal and copies of all documents related to such dismissal.

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5. List all flaws in construction that have been identified during the construction of the plant through inspection or reinspection. For each such flaw, provide a copy of the inspection or reinspection report, explain what was done to remedy the problem, whether the repair or replacement was reinspected, and copies of all documents related to the reinspection or repairs. This listing of flaws in construction should include, but is not limited to, cracking of any concrete in the plant, particularly the concrete base, and any hairline cracks in structural steel in the plant, particularly that steel surrounding the dry well.
6. Provide a copy of all documents relating to the radiation monitoring system for the plant. Has the Nuclear Regulatory Commission or other appropriate regulatory body ever questioned aspects of the proposed monitoring system? If so, list all such questions, what was done to resolve the problem, and provide copies of all documents pertaining thereto. Any information provided regarding the radiation monitoring system should indicate the type of equipment to be used, what types of radiation will be monitored and how often, and the proposed maintenance plan to insure the equipment is properly functioning. Also provide information as to whether the monitoring plan will include: (1) continuous monitoring on the lake for air and water that can be read remotely, and (2) continuous monitoring on the site boundary that can be read remotely. If not, explain why and also indicate whether such a plan has ever been proposed by the NRC or other regulatory body or by an employee of Applicant or its contractors.
7. Provide all documents relating to reactor coolant piping, including, but not limited to, the type of materials to be used, the specified installation procedures, whether there will be undercuts in such piping allowed, and what procedures the Applicant intends to implement for inspection and maintenance of such piping. Is Applicant aware of potential problems related to cracking due to stress or corrosion? If so, describe Applicant's knowledge of such problems and provide copies of all documents that Applicant has used to understand and eliminate such problems.
8. Provide all documents related to electrical cables to be used in the plant, including, but not limited to, the specific materials to be used in the cables and insulation, the specified installation procedures and what procedures the Applicant intends to implement for inspection and maintenance of such cables. Is Applicant aware of problems related to deterioration of such cables? If so, describe Applicant's knowledge of such problems and provide copies of all documents that Applicant has used to understand and eliminate such problems.
9. Provide all documents related to the design of cable trays to be used in the plant, including, but not limited to, the isolation, spacing and delineation of such trays, the specific materials to be used in the trays, the specified installation procedures and what procedures the Applicant intends to implement for inspection and maintenance of such trays. Is the Applicant aware of problems related to separation, isolation, spacing and delineation of such trays and their cables? If so, describe Applicant's knowledge of such problems and provide copies of all documents that Applicant has used to understand and eliminate such problems. Has Applicant ever considered using sprinkler

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systems to deal with problems that may be related to cable trays? If not, explain why in detail. If yes, provide copies of all documents related to such a consideration, and explain why such sprinkler systems were not included in the plant.

10. Provide all documents related to an evacuation plan for residents of Southeast Michigan and Ohio in case of an accident at the plant. Is there an evacuation plan that has been approved by Michigan or Federal authorities. If so, provide a copy of such plan. If not, explain why such a plan does not exist or has not been formally approved and provide copies of all draft plan, and communications with federal and state authorities. Also provide an explanation and copies of any documents related to the question of whether any individuals residing in the Stony Pointe area or other areas within a ten mile radius of the plant would be exposed to more radiation and danger because of the lack of an adequate evacuation route for such individuals. In particular, will any individual residing near the plant be forced to travel closer to the plant site in order to evacuate the area? If the Applicant believes that no individuals will be placed in such a situation as described in the preceding sentence, explain why and indicate alternate evacuation routes for such individuals, particularly those living in the Stony Pointe area.
11. Provide copies of all documents related to design conditions established for high-water conditions at the plant site. How was the Applicant's final design parameter for high water arrived at? Has that design parameter ever been exceeded in the immediate past or since records have been kept? On how many occasions have the design parameters even been approached by high-water conditions near the plant site?
12. Provide copies of all documents used by the Applicant in analyzing the effects of mining, milling, enrichment and fabrication of uranium in the nuclear fuel cycle. If the Applicant did not analyze such effects or did so perfunctorily, explain why.

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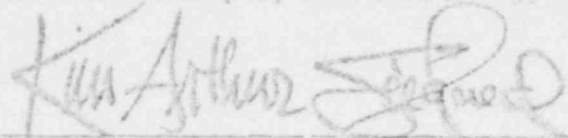
CEE requests that Applicant provide it with one copy of the Preliminary Safety Analysis Report and any revisions of such report. If provided with such report, CEE would require that any responses to the above Interrogatories be satisfied by citing the relevant section of the PSAR or revision. However, responses related to documents other than the PSAR would still require the provision of such documents.

13. Identify each witness who will present direct testimony on behalf of Applicant, state the numbered paragraph(s) and lettered sub-paragraph(s) in the Stipulation of Contentions concerning which the witness will testify, and set forth for each witness: (1) his or her educational background, (2) his or her employment experience, (3) a description of each publication related to his or her testimony which he or she has authored or co-authored, (4) each instance in which the witness has previously testified on the same or a closely-related issue, (5) the substance of the facts or opinions to which he or she is expected to testify, (6) a summary of the basis for each opinion of such witness, (7) a description of each document on which he or she is expected to rely or which Applicant contends supports his or her testimony (if such document is not provided in response to the Interrogatories above, provide a copy with your response to 13), and (8) a description of each document known to Applicant that may

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tend to refute or contradict his or her testimony (if such document is not provided in response to the Interrogatories above, provide a copy with your response to 13).

Citizens for Employment and Energy



By Kim Arthur Siegfried, its attorney

Certificate of Service

I hereby certify that I have this 25th day of May, 1979 served the foregoing document entitled "CEE Interrogatories to Applicant" by mailing copies thereof, first class mail, postage prepaid and properly addressed to the following persons:

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(original).

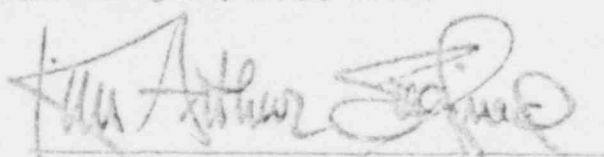
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\*and "Notice of Appearance"

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