

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



In the Matter of)
The Cincinnati Gas & Electric)
Company, et al.) Docket No. 50-358
(Wm. H. Zimmer Nuclear Power Station)

MIAMI VALLEY POWER PROJECT'S ANSWERS TO
APPLICANTS FIFTH SET OF INTERROGATORIES

1. Describe in detail what loads the Project asserts are carried by vertical segments of cable trays under all loading combinations.

The vertical segments are carrying greater loads than are allowed by the specifications.

2. If the vertical welds carried no load would the Project assert they were "critical."

Yes.

3. Describe in detail which vertical welds Mr. Hofstadter inspected, against which specification he inspected, and, for each weld which was asserted to be defective, the precise way or ways the vertical welds did not meet these specifications.

The welds on the three piece construction lack fusion. Mr. Hofstadter knows that the welders who made these welds were not certified and unable to make a weld with fusion. Specifications ASME section 9.

4. Describe in detail the cable trays or segments thereof which the Project asserts are overloaded.

Every cable tray that has cables above the original sides of the tray.

5. For each cable tray identified in response to Interrogatory 4, state in detail the basis for the assertion that such cable tray is overloaded, describing in detail any specification or documentation utilized by it or relied upon.

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5. answer

Normal and customary practice is to fill the trays no more than 70% full.

6. Describe in detail any horizontal cable trays which the Project asserts is defective, state the location and basis for each such deficiency asserted by the Project.

None

7. State in detail the basis for the assertion that, as a rule, welders were permitted to make welds on cable trays for which they were not certified. Identify all involved individuals and welds.

Welders could never pass the certification test. Mr. Hofstadter had the job of evaluating the test pieces the welders made; he inspected the test results and found them not qualified to pass the test. Welders involved: Marvin Brock, Junior Allen. Welds involved: all vertical fittings with three piece construction.

8. State whether the Project is asserting that a welder must be certified on all welds prior to being permitted to make a weld for which he is certified.

No.

9. State in detail the reasons why the December 4, 1978 letter to Mr. Edwin Hofstadter as it applies to the Zimmer Station is not dispositive of the allegations regarding cable trays.

See attached letter from Mr. Hofstadter to Mr. Keppler, dated December 22, 1978

10. State in detail the basis for the assertion that for vertical fittings, "the entire weight of the cables depends wholly -100 percent- on the welds."

If the weight of the cables is too great for the welds the cable trays will break apart. Laws of physics.

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11. With regard to the cable trays, state specifically what portions of the ASME Boiler and Pressure Vessel Codes, including all addenda and codes, the Project asserts are applicable and explain in detail the basis for your response.

ASME section 9, dealing with welding of Boiler and Pressure Vessels, states minimum welding standards and states the test for certification of welders to make welds. This test is the lowest allowable standard in the welding trade.

12. State if the Project is asserting that The Welding Handbook is part of the ASME Boiler and Pressure Vessel Code or that it has any legal binding effect. Identify the author and publisher of The Welding Handbook.

Yes, because bid which was accepted for the welding job included a requirement of meeting ASME section 9 standards.
Author and publisher: American Society of Mechanical Engineers.

13. State if the Project is asserting that a Zimmer Station cable tray is a pressure vessel or boiler and the basis for such assertion.

A cable tray is neither a pressure vessel nor a boiler.

14. Describe any written correspondence or document related to this contention in the possession of the Project not already sent by the NRC Staff to all parties in this proceeding.

None.

15. State the education and training of Mr. Tom Martin which enables him to evaluate the acceptance specifications for control rods.

Journeyman millwright since November, 1973.

16. Identify the other two millwrights who Mr. Martin claims were "laid (sic) off."

Kenny Campbell, Everett Coyle.

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17. State in detail the basis for the assertion that Mr. Martin and the two other millwrights were "layed (sic) off" because of concerns expressed about lack of compliance with specifications.

Objection.

18. Describe in detail what specifications the Project alleges were not being complied with in regard to control rod acceptance.

Roughness of seals; size of rods.

19. Identify with particularity the individuals Mr. Martin contacted, the date of contract, whether such contract was in writing or recorded and the substance of Mr. Martin's allegations and the disposition of such allegation.

Scott Swain, inspector at Zimmer, Bud Crane, supervisor for RCI;

Mr. May; James Foster, NRC. Dates and modes of contact unknown.

20. Respond to Interrogatory 19 for the other two millwrights.

Unknown

21. Identify the individual by name, position, and employers who informed Mr. Martin of the acceptability of the procedure because "water pressure will adjust the diameter to specifications."

Bud Crane, supervisor at RCI

22. Describe any written correspondence or document related to their contention in the possession of the Project not already sent by the NRC Staff to all parties in this proceeding.

None

23. Describe in detail the number and location of all seals which the Project alleges do not meet specifications.

Objection

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