

July 10, 1981



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
UNION ELECTRIC COMPANY)	Docket No. STN 50-483-OL
)	
(Callaway Plant, Unit 1))	

APPLICANT'S RESPONSE TO
JOINT INTERVENORS' FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO UNION ELECTRIC

Pursuant to 10 C.F.R. §2.741(d), Applicant hereby responds to Joint Intervenor's First Request for Production of Documents to Union Electric by stating that the documents in the possession, custody, or control of the Union Electric Company, the production of which have been requested by Joint Intervenor's, will be made available, except for those documents noted below, to Joint Intervenor's for inspection and copying in the following manner.

The requested documents will be made available in the offices of Union Electric Company, 1901 Gratiot Street, St. Louis, Missouri. Applicant objects to Joint Intervenor's document production request to the extent that it seeks the production at the office of Joint Intervenor's counsel.

The documents will be made available during Union Electric business hours (or such other mutually agreeable time). Appointments to inspect the documents may be arranged by telephoning Charles A. Bremer at 621-3222, at least 24 hours before the requested inspection. Applicant will maintain the requested documents assembled in Union Electric's offices, available for inspection by Joint Intervenors, for a reasonable time (i.e., until August 7, 1981), after which they will be returned to their place of origin.

Inspected documents which Joint Intervenors wish to have copied will be reproduced by Union Electric Company on a schedule compatible with other demands for duplicating equipment. A Union Electric Company employee will be available during the inspection in order to receive any requests for copying. Copies of such selected documents will then be furnished to Joint Intervenors upon payment of 15 cents per page, to meet Union Electric Company's cost of reproduction.

Applicant will not produce the following requested documents, for the reasons stated.

DOCUMENT REQUEST No. 13: All nonconformance reports (NCRs) or other documents which explain why a "hold" was placed on the concrete pour on the 1988 slab elevation in the Auxiliary Building, and which explain why the "hold" was lifted.

RESPONSE: Applicant is unable to respond to this request without a further identification of the "hold" referred to therein.

DOCUMENT REQUEST NO. 42: All documents presented to the NRC by Union Electric and consultants at the meeting of January 23, 1978 regarding concrete cover in the Reactor Building, including the following:

- a. Documentation on radial shear tie distribution and orientation and the relation to radial tension ties;
- b. Documentation on concrete cover requirements as related to crack and corrosion control;
- c. Documents or provisions of documents controlling the above requirements, including relevant sections of BC-TOP-5A Revision 3 (such as, Section CC-3533.1 and CC-3534 of Appendix C to BC-TOP-5A).

RESPONSE: No documents were presented to the NRC by Union Electric or its consultants at the January 23, 1978 meeting regarding concrete cover in the reactor building.

DOCUMENT REQUEST NO. 43: The information and statement to have been provided by Union Electric to the NRC regarding the location of all radial shear bars in lifts 1 through 3 in the Reactor Containment Building (referred to in Minutes of Meeting on concrete cover held on January 23, 1978, p. 7).

RESPONSE: Union Electric did not submit written documentation to the Staff regarding the location of radial shear bars in lifts 1 through 3 in the reactor building. Applicant refers Joint Intervenors to page 9 of the NRC Inspection Report No. 50-483/78-01 (to be produced in response to Document Request No. 41), regarding the verification of the location of these radial shear bars.

DOCUMENT REQUEST NO. 48: The Union Electric purchase orders for pipe spools from Dravo involving SA 312 pipe manufactured by Youngstown Welding and Engineering (YW & E).

RESPONSE: The purchase orders to Dravo do not specify the pipe manufacturer and therefore Applicant is unable to differentiate purchase orders applicable to Youngstown Welding and Engineering manufactured pipe from pipe manufactured by other entities.

DOCUMENT REQUEST NO. 49: The Dravo purchase orders for SA 312 pipe from YW&E involving pipe intended for use at Callaway.

DOCUMENT REQUEST NO. 51: The welding procedure specifications used by YW&E to weld the SA 312 pipe intended for use at Callaway.

DOCUMENT REQUEST NO. 52: The welding procedure specifications used by YW&E after mid-November, 1979 to weld SA 312 without centerline lack of penetration.

DOCUMENT REQUEST NO. 53: The welding procedure qualification records used by YW&E to qualify the above welding procedures.

DOCUMENT REQUEST NO. 54: The YW&E welding operator qualification test records of the welding operators who welded the SA 312 pipe intended for use at Callaway.

DOCUMENT REQUEST NO. 55: The Quality System Manual used by YW&E at the time the SA 312 pipe intended for use at Callaway was manufactured.

RESPONSE: The requested documents are not in the possession, custody or control of Applicant.

Additionally, Applicant offers the following explanations with respect to certain of Joint Intervenors' document requests.

DOCUMENT REQUEST NO. 6: Copy of enclosure 1 to ULNRC-238 entitled "Investigation of Welded Studs".

DOCUMENT REQUEST NO. 7: Copy of the probability analysis for plates with machine-welded studs presented in ULNRC-238.

RESPONSE: The requested documents are included as enclosures to Applicant's response to Document Request No. 5.

DOCUMENT REQUEST NO. 28: Wiss, Janey, Estner & Assoc., Inc. report no. 77401, dated Aug. 1, 1977. Soniscope study of honeycombing in base mat.

DOCUMENT REQUEST NO. 30: Bechtel's letter BLSE-4972, dated September 28, 1977.

DOCUMENT REQUEST NO. 31: NCR 2-0856-C-A.

DOCUMENT REQUEST NO. 32: CPPR-139, Interim Report (July 15, 1977) and Final Report (September 29, 1977).

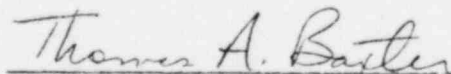
RESPONSE: The documents requested by Document Request Nos. 28, 30 and 31 are included as attachments to the "Final Report" requested by Document Request No. 32. The "Interim Report" requested by Document Request No. 32 is identical to that requested by Document Request No. 27.

DOCUMENT REQUEST NO. 38: All test reports and soniscope studies of the concrete of the Reactor Dome.

RESPONSE: Pursuant to this request, Applicant is producing a Bechtel report (BLUE-778) dated March 26, 1981, which is entitled "Final Report of Containment Dome Concrete Imperfections at Callaway Unit 1". However, Bechtel has recently completed additional tests of the containment dome concrete, which will result in revisions of, and clarifications to, the March 26, 1981 report. These revisions are expected to be completed by September 1, 1981, at which time Applicant will produce the revised report for inspection by Joint Intervenors.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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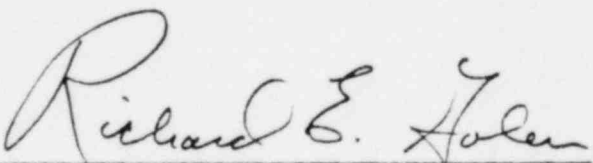
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Answers to Interrogatories of Joint Intervenors (First Set)" and "Applicant's Response to Joint Intervenors' First Request for Production of Documents to Union Electric" were served this 10th day of July, 1981 by deposit in the U.S. mail, first class, postage prepaid, to the parties identified on the attached Service List.


Richard E. Galen

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