



RELATED CORRESPONDENCE

August 10, 1981

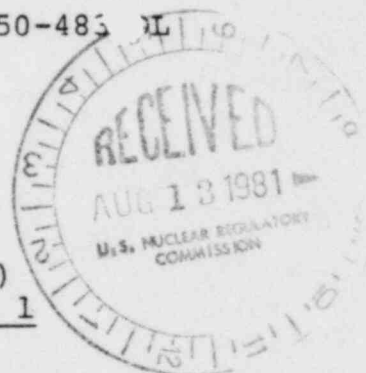
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
)
UNION ELECTRIC COMPANY)
)
(Callaway Plant, Unit 1))

Docket No. STN 50-483 XL 10

APPLICANT'S INTERROGATORIES AND
REQUESTS FOR DOCUMENT PRODUCTION (SET NO.2)
TO JOINT INTERVENORS ON THEIR CONTENTION NO. 1



Applicant UNION ELECTRIC COMPANY hereby requests that each of the Joint Intervenors COALITION FOR THE ENVIRONMENT, ST. LOUIS REGION; MISSOURIANS FOR SAFE ENERGY; and the CRAWDAD ALLIANCE, pursuant to 10 CFR §§2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents therein identified, Joint Intervenors file supplemental responses and produce additional documents as required by 10 CFR §2.740(e). As set forth in the Special Pre-Hearing Conference Order of April 21, 1981, responses to these discovery requests are due no later than September 10,

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1981; objections to interrogatories or the production of documents are to be served within fourteen (14) or thirty (30) days, respectively, of the date of service of these requests. It will be acceptable if the Joint Intervenors choose to file a joint response to these requests provided that such responses include all information and all documents in the possession, custody or control of any of the Joint Intervenors.

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

As used in these discovery requests the term "document(s)" includes publications of any format, letters, memoranda, notes, reports, analyses, test results or data, recordings, transcriptions and printed, typed or written materials of every kind in the possession, custody or control or within the knowledge of any of the Joint Intervenors or their counsel.

Joint Intervenors' Contention No. 1A (Embedded Plates)

1A-18. Does Kay Drey have first-hand knowledge of the factual basis for any of the allegations in your Contention No. 1A?

1A-19. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1A.

1A-20. Did Kay Drey provide any information and/or documents used in your responses to Interrogatory Nos. 1A-1 through 1A-17?

1A-21. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory and identify the information and/or documents provided by Kay Drey used in the response to such interrogatory.

1A-22. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who provided information and/or documents used in your responses to Interrogatory Nos. 1A-1 through 1A-17, and indicate for each such person the interrogatories for which he or she provided such information and/or documents.

1A-23. Did Kay Drey prepare any of the Joint Intervenors' responses to Interrogatory Nos. 1A-1 through 1A-17?

1A-24. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory response.

1A-25. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who prepared any of the Joint Intervenors' responses to Interrogatory Nos. 1A-1 through 1A-17, and indicate for each such person the interrogatory responses which he or she prepared.

1A-26(a). State the factual basis for the allegation in your response to Interrogatory No. 1A-6(a) that Union Electric did not act upon the suggestion of the NRC to identify the location of the 480 plates.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1A-27(a) State the factual basis for the allegation in your Contention No. 1A and in your response to Interrogatory No. 1A-11(a) that the four (4) exceptions listed in such response were "improperly determined" to be allowable.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1A-28(a) State the factual basis for the allegation in your response to Interrogatory No. 1A-12(a) that "[a]pparently there was no inspection or testing of those [embedded plates] already installed prior to [the issuance of the stop work order]."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you

to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1A-29(a) Explain fully and state the factual basis for the allegation in your response to Interrogatory No. 1A-12(a) that "[f]ive load tests should have been performed in order to approximate the actual stress that these embeds must eventually bear."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(a) State the name of each person you intend to call

as a witness to support this allegation.

1A-30(a) Explain fully and state the factual basis for the allegation in your response to Interrogatory No. 1A-12(a) that "if some of the machine-welded plates were not loaded, no valid basis existed for their evaluation."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1A-31(a) State fully the factual basis for the allegation in your response to Interrogatory No. 1A-12(a) that "[o]nly six out of 255 machine welded plates installed prior to June 9, 1977 were inspected."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you

to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1A-32. Please respond in greater detail and with greater specificity to Interrogatory 1A-12(e) through (h), including listing individually the inspections and/or tests you contend should have been performed and the specific factual basis for each such contention.

1A-33. Please respond in greater detail and with greater specificity to Interrogatory No. 1A-14(b) and (c), providing (as previously requested and not provided) the factual basis for your allegation of a failure in the quality assurance program, the specific nature and degree of such alleged failure, and the specific documents which support this allegation.

1A-34. Please respond in greater detail and with greater specificity to Interrogatory No. 1A-15(b) and (c), providing (as previously requested and not provided) the factual basis for your allegation of an effect on the safe operation of the

Callaway Plant, the specific manner and degree in which such safe operation will allegedly be affected, and the specific documents which support this allegation.

Joint Intervenor's Contention No. 1B (Concrete Cracks)

1B-12. Does Kay Drey have first-hand knowledge of the factual basis for any of the allegations in your Contention No. 1B?

1B-13. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1B.

1B-14. Did Kay Drey provide any information and/or documents used in your responses to Interrogatory Nos. 1B-1 through 1B-11?

1B-15. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory and identify the information and/or documents provided by Kay Drey used in the response to such interrogatory.

1B-16. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who provided information

and/or documents used in your responses to Interrogatory Nos. 1B-1 through 1B-11, and indicate for each such person the interrogatories for which he or she provided such information and/or documents.

1B-17. Did Kay Drey prepare any of the Joint Intervenors' responses to Interrogatory Nos. 1B-1 through 1B-11?

1B-18. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory response.

1B-19. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who prepared any of the Joint Intervenors' responses to Interrogatory Nos. 1B-1 through 1B-11 and indicate for each such person the interrogatory responses which he or she prepared.

1B-20(a) What affirmative facts or other information, if any, do you have (beyond the nonresponsive reply to Interrogatory No. 1B-6(a)) to support your allegation that the crack in the reactor cavity moat area will affect the safe operation of the Callaway Plant, specifying, in detail, the manner and degree in which such safe operation will allegedly be affected.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and

present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1B-21(a) State the factual basis for the allegation in your response to Interrogatory No. 1B-6(a) that there was a "failure to discover and inspect the crack [in the reactor cavity moat area] in a timely manner."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call

as a witness to support this allegation.

1B-22(a) What affirmative facts or other information, if any, do you have (beyond the nonresponsive reply to Interrogatory No. 1B-7(a)) to support your allegation that the crack in the "north wall" of the Control Building will affect the safe operation of the Callaway Plant, specifying, in detail, the manner and degree in which such safe operation will allegedly be affected.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1B-23(a) State the factual basis for the allegation in your response to Interrogatory No. 1B-7(a) that "UE's quality assurance personnel overlooked the crack [in the Control Building 'north wall'] and allowed the next lift to be poured on top."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1B-24(a) State the factual basis for the allegation in your response to Interrogatory No. 1B-8(a) that "[c]oncrete was poured over the crack without its being reported by quality assurance personnel."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity

as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

Joint Intervenor's Contention No. 1C (Honeycombing)

1C-13. Does Kay Drey have first-hand knowledge of the factual basis for any of the allegations in your Contention No. 1C?

1C-14. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1C.

1C-15. Did Kay Drey provide any information and/or documents used in your responses to Interrogatory Nos. 1C-1 through 1C-12?

1C-16. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory and identify the information and/or documents provided by Kay Drey used in the response to such interrogatory.

1C-17. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who provided information

and/or documents used in your responses to Interrogatory Nos. 1C-1 through 1C-12, and indicate for each such person the interrogatories for which he or she provided such information and/or documents.

1C-18. Did Kay Drey prepare any of the Joint Intervenors' responses to Interrogatory Nos. 1C-1 through 1C-12?

1C-19. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory response.

1C-20. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who prepared any of the Joint Intervenors' responses to Interrogatory Nos. 1C-1 through 1C-12, and indicate for each such person the interrogatory responses which he or she prepared.

1C-21(a) State the factual basis for the allegation in your response to Interrogatory No. 1C-6(b) that "[t]he design of the base mat may have called for an overcongestion of reinforcing steel, contrary to Criterion III of Appendix B and to General Design Criterion I of Appendix A of Part 50," specifying, in detail, the nature and degree of the alleged deviation from the requirements of the referenced Criteria.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1C-22(a) State the factual basis for the allegation in your response to Interrogatory No. 1C-6(b) that "[t]he concrete pour was not monitored properly, contrary to the monitoring instructions and procedures, contrary to Criterion X of Appendix B," specifying, in detail, the nature and degree of the alleged deviation from the requirements of the referenced Criterion.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty,

professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1C-23(a) State the factual basis for the allegation in your response to Interrogatory No. 1C-6(b) that "[s]oniscope examination of a sample of . . . 25% . . . may be contrary to Criterion X of Appendix B," specifying, in detail, the nature and degree of the alleged deviation from the requirements of the referenced Criterion.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1C-24(a) State the factual basis for the allegation in your response to Interrogatory No. 1C-6(b) that "[r]epair work was in progress before the NCR covering the same was

approved," specifying the exact nature and location of the referenced "repair work" and the number of the referenced NCR.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1C-25(a) What affirmative facts or other information, if any, do you have (beyond the nonresponsive reply to Interrogatory No. 1C-7(b)) to support your allegation that the honeycombing in the tendon access gallery will affect the safe operation of the Callaway Plant, specifying, in detail, the manner and degree in which such safe operation will allegedly be affected.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you

to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1C-26. Do you contend that there was any cold joining (improper bonding) in the concrete of the reactor base mat due to the drying (setting up) of concrete in certain areas before additional concrete was poured on top?

1C-27. If the answer to the preceding interrogatory is affirmative, or other than negative, provide the following information:

(a) State the factual basis for such allegation.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty,

professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1C-28(a) State the factual basis for the allegation in your response to Interrogatory No. 1C-9(b) that "[f]aults in the concrete of the dome could easily compromise this function ['boundary designed to contain radioactive materials'], allowing radioactive materials to escape to the environment."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

Joint Intervenor's Contention 1D (Concrete Coverage)

1D-10. Does Kay Drey have first-hand knowledge of the factual basis for any of the allegations in your Contention

No. 1D?

1D-11. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1D.

1D-12. Did Kay Drey provide any information and/or documents used in your responses to Interrogatory Nos. 1D-1 through 1D-9?

1D-13. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory and identify the information and/or documents provided by Kay Drey used in the response to such interrogatory.

1D-14. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who provided information and/or documents used in your responses to Interrogatory Nos. 1D-1 through 1D-9, and indicate for each such person the interrogatories for which he or she provided such information and/or documents.

1D-15. Did Kay Drey prepare any of the Joint Intervenors' responses to Interrogatory Nos. 1D-1 through 1D-9?

1D-16. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such

interrogatory response.

1D-17. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who prepared any of the Joint Intervenors' responses to Interrogatory Nos. 1D-1 through 1D-9, and indicate for each such person the interrogatory responses which he or she prepared.

1D-18. Does the term "requirements" used in the first sentence of your response to Interrogatory No. 1D-6(b) refer to the requirements set forth in Bechtel Specification No. 10466-C112(Q), Revision 9 and ACI 318-71 Section 7.3.2 or does it refer to the interpretation of such requirements by the NRC?

1D-19(a) State the factual basis for the allegation in your response to Interrogatory No. 1D-6(b) that "requirements for concrete cover were either ignored or grossly misunderstood."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty,

professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1D-20. On what date do you contend the NRC "indicated to the Applicant that the NRC's interpretation of the requirements must prevail"?

1D-21. At what point in the construction process (i.e., at what lift) do you contend that the NRC's interpretation of the concrete coverage requirement was to "prevail" as that term is used in your response to Interrogatory No. 1D-6(b)?

1D-22(a) State the factual basis for your contentions set forth in response to Interrogatory Nos. 1D-20 and 1D-21.

(b) Identify all documents you rely upon to support these contentions.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for these contentions. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call

as a witness to support these contentions.

1D-23. In reference to the allegation in your response to Interrogatory No. 1D-6(b) that "numerous instances of failure to meet the requirements were found," whose interpretation of the requirements are you referring to?

1D-24. What affirmative facts or other information, if any, do you have (beyond the nonresponsive reply to Interrogatory No. 1D-7(b)) to support your allegation that the alleged failure of concrete coverage to "adhere to requirements" will affect the safe operation of the Callaway Plant, specifying, in detail, the manner and degree in which such safe operation will allegedly be affected.

Joint Intervenor's Contention No. 1E (Piping)

1E-20. Does Kay Drey have first-hand knowledge of the factual basis for any of the allegations in your Contention No. 1E?

1E-21. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1E.

1E-22. Did Kay Drey provide any information and/or

documents used in your responses to Interrogatory Nos. 1E-1 through 1E-19?

1E-23. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory and identify the information and/or documents provided by Kay Drey used in the response to such interrogatory.

1E-24. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who provided information and/or documents used in your responses to Interrogatory Nos. 1E-1 through 1E-19, and indicate for each such person the interrogatories for which he or she provided such information and/or documents.

1E-25. Did Kay Drey prepare any of the Joint Intervenors' responses to Interrogatory Nos. 1E-1 through 1E-19?

1E-26. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory response.

1E-27. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who prepared any of the Joint

Intervenors' responses to Interrogatory Nos. 1E-1 through 1E-19, and indicate for each such person the interrogatory responses which he or she prepared.

1E-28. Identify and provide documentation for any other alleged instances of which you have knowledge of safety-related SA 358 piping containing "poor fusion" (surface overlap) and/or "excess inside reinforcement" as referred to in your response to Interrogatory No. 1E-6(a).

1E-29. The NRC Inspection and Enforcement Report No. 50-483/81-04, referenced in Joint Intervenors' responses to Interrogatories 1E-8, 1E-9, 1E-11, 1E-12, and 1E-13, states that, with respect to the SA 358 piping in the accumulator discharge tank, "[t]he visual inspections, measurements, and radiographic review of the pipe performed during this investigation indicate that the pipe piece presently meets all ASME Code requirements and is acceptable." Do you contend that this statement is materially inaccurate?

1E-30. If the answer to the preceding interrogatory is affirmative, or other than negative, provide the following information:

- (a) State the factual basis for such allegation.
- (b) Identify all documents you rely upon to support this allegation.
- (c) State the name, present or last known address, and present or last known employer of each person known to you

to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-31. Do you contend that the surface overlap condition or the excess inside reinforcement on the SA 358 piping referenced on Deficiency Report 2SD-0699-P adversely affects the structural integrity of such pipe?

1E-32. If the answer to the preceding interrogatory is affirmative, or other than negative, provide the following information:

(a) State the factual basis for such allegation.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty,

professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-33(a) State the factual basis for the allegation in your response to Interrogatory No. 1E-9(a)(3) that "[e]ven though the defective area has been ground and no visible defects remain, the structural integrity of the [SA 358] pipe has not been fully investigated or established."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-34(a) State the factual basis for the allegations in your responses to Interrogatory Nos. 1E-9(a)(3) and 1E-13(b) that "[t]he appearance of the inside weld indicates that the original inside weld was melted through by a pass made from

the outside," including the name, address and professional qualifications of any individual who has given an opinion to this effect.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-35(a). State the factual basis for the allegation in your responses to Interrogatory Nos. 1E-9(a)(3) and 1E-13(b) that "[d]efects of a similar nature may exist in other safety-regulated SA 358 pipe and remain unidentified."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for

any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-36(a) State the factual basis for the allegation in your response to Interrogatory 1E-9(a)(3) that "[i]t is not the responsibility or obligation of craft personnel to identify nonconformances or deficiencies."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-37. Joint Intervenors, in response to Interrogatory 1E-11, reference Nonconformance Report 2SN-0496-P as the basis for their allegation that a section of SA 358 pipe in the

accumulator discharge tank "was substantially out-of-round." The NRC Inspection and Enforcement Report No. 50-382/81-04, which documents the investigation of this allegation, states that "[v]isual inspections and measurements of the pipe show acceptable ovality." Do you contend that this statement is materially inaccurate?

1E-38. If the answer to the preceding interrogatory is affirmative, or other than negative, provide the following information:

- (a) State the factual basis for such allegation.
- (b) Identify all documents you rely upon to support this allegation.
- (c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-39(a) What facts or other information, if any, do you have to support the allegation in your response to

Interrogatory No. 1E-9(a)(1)(a) that "CLP at Callaway may exceed the 26% 'worst case' cited in the Bechtel report, or it may even equal or exceed the 60% critical defect size."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-40(a) State the factual basis for the allegation in your response to Interrogatory No. 1E-9(a)(1)(c) that "[t]he recommendations given in the Bechtel report, page 4, seek to give a substitute assurance of integrity and quality that is not consistent with Section III and may be considered perverse to Section III."

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you

to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-41. Joint Intervenors' responses to Interrogatory Nos. 1E-8(a) and 1E-9(a)(1) assert that the evaluation performed by Bechtel of SA 312 piping in response to IE Bulletin 79-03 should have included a flattening test. The Certified Material Test Reports of SA 312 pipe manufactured by Youngstown Welding & Engineering Co. for use at the Callaway plant, produced by Applicant pursuant to Joint Intervenors' Document Request No. 50, indicate that all such piping met the ASME Code flattening test criteria. Do you contend that it was necessary for Bechtel to conduct additional flattening test in order to meet the ASME Code criteria?

1E-42. If the answer to the preceding interrogatory is affirmative, or other than negative, provide the following information:

(a) State the factual basis for such allegation.

(b) Identify all documents you rely upon to support

this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-43. Do you contend that post-accident irradiation in the RHR system at the Callaway Plant will affect the mechanical properties (including ductility) of SA 312 piping containing centerline lack of penetration?

1E-44. If the answer to the preceding interrogatory is affirmative, or other than negative, provide the following information:

(a) State the factual basis for such allegation.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for

any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

1E-45. What type of radiation do you contend would be experienced in the RHR system under post-accident conditions?

1E-46. As to your response to the preceding interrogatory, provide the following information:

(a) State the factual basis for such contention.

(b) Identify all documents you rely upon to support this contention.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this contention. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this contention.

1E-47. Do you contend that CLP in SA 312 piping at the Callaway Plant exceeds 26 percent of wall thickness?

1E-48. If the answer to the preceding interrogatory is affirmative, or other than negative, provide the following information:

(a) State the factual basis for such allegation.

(b) Identify all documents you rely upon to support this allegation.

(c) State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

(d) State the name of each person you intend to call as a witness to support this allegation.

Joint Intervenor's Contention No. 1F (Pre-Assembly Piping Formations)

1F-12. Does Kay Drey have first-hand knowledge of the factual basis for any of the allegations in your Contention No. 1F?

1F-13. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1F.

1F-14. Did Kay Drey provide any information and/or documents used in your responses to Interrogatory Nos. 1F-1 through 1F-11?

1F-15. If the answer to the preceding interrogatory is affirmative or other than negative, identify each such interrogatory and identify the information and/or documents provided by Kay Drey used in the response to such interrogatory.

1F-16. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who provided information and/or documents used in your responses to Interrogatory Nos. 1F-1 through 1F-11, and indicate for each such person the interrogatories for which he or she provided such information and/or documents.

1F-17. Did Kay Drey prepare any of the Joint Intervenors' responses to Interrogatory Nos. 1F-1 through 1F-11?

1F-18. If the answer to the preceding interrogatory is affirmative or other than negative identify each such

interrogatory response.

1F-19. Identify generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable, each person who prepared any of the Joint Intervenors' responses to Interrogatory Nos. 1F-1 through 1F-11, and indicate for each such person the interrogatory responses which he or she prepared.

General Interrogatories Pertaining To Contention Nos. 1A Through 1F

F. State the name, title or position, address and employer of each person who provided information used in preparing responses to any of the foregoing interrogatories. If you object to providing such information for any such person, identify such person generically (i.e., by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

G. For each person identified in response to the preceding interrogatory, state the numbers of the interrogatories for which information was supplied.

H. State the name, title or position, address and employer of each person who searched for documents in order to respond to any of the foregoing requests for identification and production of documents. If you object to providing such information for any such person, identify such person generically (i.e.,

by employer or description of employer, job title, specialty, professional qualifications, etc.) with as much specificity as you find non-objectionable.

I. For each person identified in response to the preceding interrogatory, state the numbers of the discovery requests for which the search was conducted and the location where the search was conducted.

Respectfully submitted,

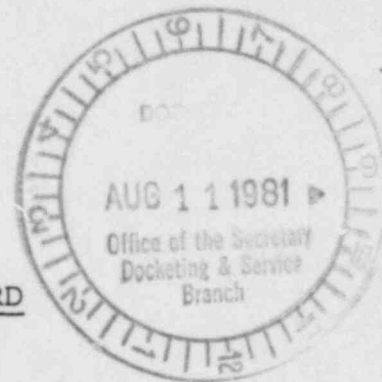
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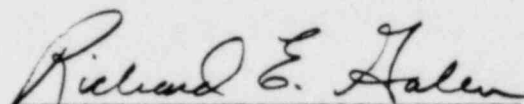
Dated: August 10, 1981

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicant's Interrogatories and Requests for Document Production (Set No. 2) to Joint Intervenors on Their Contention No. 1" and Applicant's Interrogatories and Requests for Document Production (Set No. 2) to Joint Intervenors on Their Contention No. 2" were served this 10th day of August, 1981 by deposit in the U.S. mail, first class, postage pre-paid, to the parties identified on the attached Service List.


Richard E. Galen

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))	

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