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Docket No. STN 50-483-OL

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U.S. NUCLEAR REGULATORY
COMMISSION

1A-9. (a) This was communicated orally to Kay Drey from construction workers, a former UE Quality Control Engineer, a former Radiographer at the Callaway Plant, and NRC Inspectors. Applicant's answer and objection to Joint Intervenors' Interrogatory 8 (First Set), and the 6000 documents referred to in the objection.

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Bechtel Memorandum 10/28/77, to G. Westoff from R.D. Chappell
Corrective Action Report No. 2-0059-C dated 9/6/77
Attachment B (dated 6/27/77) to NCR 2-1193-C-B

- (c) Objected to.
- (d) None.
- 1B-9. (d) Objected to.
- (e) None.
- 1D-6. (b) The following is substituted for the answer to Interrogatory 1D-6(b):

The very fact that requirements for concrete cover were either ignored or grossly misunderstood indicates a failure of the quality assurance program. Even after the NRC indicated to the Applicant that allegations about the improper installation of reinforcing steel and the resulting substandard concrete coverage were under investigation numerous instances of failure to adhere to proper construction practices and Appendix B criteria were found. See NRC Report Nos. 50-483/77-11, pp. 9-11, and 50-483/78-01, pp. 9-10.

CONTENTION NO. 2

- C-1. (a) See Supplemental Answer to NRC Interrogatory Q-3(a) and (b).
- (b) See (a), above.
- (c) Objected to.
- (d) None.
- C-2. See Supplemental Answer to NRC Interrogatory Q-3(c).
- C-3. See Supplemental Answer to NRC Interrogatory Q-3(e).
- C-4. Joint Intervenors have no responsive information beyond that contained in Supplemental Answer to NRC Interrogatory Q-3.


C-5. No.

C-6. No.

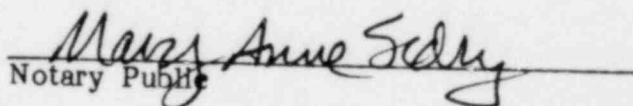
- C-7. (1) Radionuclides such as Cs137, accumulate at or near the outfall pipe of a nuclear power plant. Dredging and/or flooding would cause resuspension of these materials. The U.S. Army Corps of Engineers has conducted dredging operations in the Missouri River and such operations reasonably can be expected to occur again.
- (2) Radiological Surveillance Studies, EPA: (a) Haddom Neck EPA-520/3-74-007 (1974) and (b) Yankee Row RD77-1 (1971).
- (3) None.

C-8. Three nuclear power plants discharge into the Missouri River or a tributary thereof: Fort Calhoun, in Nebraska; Cooper, at Brownville, Nebraska; and Ft. St. Vrain, at Platteville, Colorado. In addition, active and abandoned uranium mining and milling sites along the river and its tributaries all release radioactive contaminants into the river upstream of the Callaway Plant Site.

Kenneth M. Chackes, attorney for Joint Intervenors Coalition for the Environment, St. Louis Region; Missourians for Safe Energy; and Crawdad Alliance, and authorized as their agent for the purpose of answering the above interrogatories, hereby states to the best of his knowledge, information and belief that the responses provided above are true and contain such information as is presently available to Joint Intervenors.

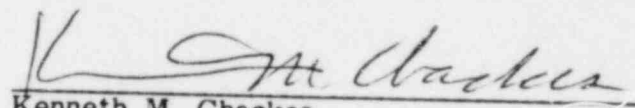

Kenneth M. Chackes

Subscribed and sworn to before me this 10 day of September, 1981.


Notary Public

My Commission Expires: 5/18/83

CHACKES AND HOARE


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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-OL
)
)

CERTIFICATE OF SERVICE

I hereby certify that copies of the Supplemental Response to Applicant's Interrogatories and Request for Document Production (Set. No. 1) to Joint Intervenors have been served on the following by deposit in the United States mail this 11th day of September, 1981.

James P. Gleason, Esq., Chairman
Atomic Safety and Licensing Board
513 Gilmore Drive
Silver Spring, MD 20901

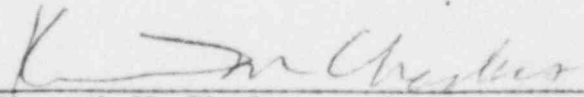
Mr. Glenn O. Bright
Atomic Safety and Licensing Board Panel
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