

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)

PUBLIC SERVICE COMPANY OF)
NEW HAMPSHIRE, et al.)

(Seabrook Station, Units 1)
and 2))

Docket Nos. 50-443
50-444

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

10/13/82

NECNP FIRST SET OF INTERROGATORIES AND
REQUEST FOR DOCUMENTS TO APPLICANTS
ON CONTENTIONS II.B.1, II.B.3, II.B.4, and II.B.5

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of the Applicants with personal knowledge of the facts or information requested in each interrogatory.

The following definitions shall apply to these interrogatories:

1. "Document" shall mean any written or graphic matter of communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other means, computer data, computer print-outs, photographs, microfilm, microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

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2. "Identify" shall mean with respect to any document, to state the following respecting the document: its title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3. "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; any document recording or documenting such action.

4. "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; the existence and location of any and all documents relating to such action or matter.

Contention II.B.1.

1. What is the Applicants' position with respect to NECNP Contention II.B.1.? State all facts and opinions and identify and provide access to all documents on which that position is based.

2. Identify all individuals whom Applicants expect to call as witnesses with respect to NECNP Contention II.B.1., and identify all documents on which Applicants expect to rely at the hearing with respect to this contention.

3. For each of the criteria of Appendix B to 10 CFR Part 50, identify where the FSAR addresses the criterion.

a. Identify and provide access to all program manuals, implementing procedures, and similar documents that describe who is responsible for carrying out the Operations Quality Assurance Program in compliance with Appendix B to 10 CFR Part 50, when the various actions are to be carried out, and how the applicable requirements of Appendix B will be satisfied.

Contention II.B.3.

4. What is the Applicants' position with respect to NECNP Contention II.B.3.? State all facts and opinions and identify and provide access to all documents on which that position is based.

5. Identify all individuals whom Applicants expect to call as witnesses with respect to NECNP Contention II.B.3., and identify all documents on which Applicants expect to rely at the hearing with respect to this contention.

6. Describe the responsibilities and functions of the Executive Vice President - Engineering and Production.

a. Describe the daily activities of the Executive Vice President - Engineering and Production.

7. Describe the responsibilities and function of the Vice President - Production.

a. Describe the daily activities of the Vice President - Production.

8. Describe the responsibilities and functions of the Nuclear Quality Manager.

a. Describe the daily activities of the Nuclear Quality Manager.

9. Describe the responsibilities and functions of the Quality Supervisor.

a. Describe the daily activities of the Quality Supervisor.

10. Describe the responsibilities and functions of the Nuclear Production Superintendent.

a. Describe the daily activities of the Nuclear Production Superintendent.

11. Describe the responsibilities and functions of the Station Manager.

a. Describe the daily activities of the Station Manager.

12. Describe the responsibilities and functions of the Nuclear Production Operations Support Manager.

a. Describe the daily activities of the Nuclear Production Operations Support Manager.

13. Describe the responsibilities and functions of the Nuclear Production Engineering Manager.

a. Describe the daily activities of the Nuclear Production Engineering Manager.

14. Describe the responsibilities and functions of the Training Center Manager.

a. Describe the daily activities of the Training Center Manager.

15. Describe the responsibilities and functions of the Compliance Manager.

a. Describe the daily activities of the Compliance Manager.

16. Provide a complete organization chart for the Operational Quality Assurance Program, showing the relationship of PSNH QA, Yankee Atomic QA, and all other aspects of the operation of Seabrook. If such a chart is not available, explain the relationships.

17. Does the Executive Vice President - Engineering and Production have any QA duties that are unique to that position and may not be delegated? If so, please describe those duties and identify the personnel with whom the Executive Vice President - Engineering and Production would interact in the course of carrying out those duties.

18. Does the Vice President - Production have any QA duties that are unique to that position and may not be delegated? If so, please describe those duties and identify the personnel with whom the Vice President - Production would interact in the course of carrying out those duties.

19. The FSAR states at page 17.2-1 that "The Vice President - Production will mediate disputes arising within the OQAP."

a. What sorts of disputes are referred to in this sentence?

b. Identify all personnel between whom disputes might arise and then be mediated by the Vice President - Production.

20. The FSAR states further at page 17.2-1 that "Where disagreement persists, the matter may be appealed to the Executive Vice President - Engineering and Production for final resolution."

a. How would such an appeal be initiated?

b. Identify all personnel with the authority to initiate such an appeal.

21. Identify each situation in which personnel in the OQAP report to personnel with any duties outside the OQAP.

a. In each case, identify the position of the personnel in question.

22. Identify each situation in which personnel in the OQAP interact with personnel involved in Nuclear Production (NP) as described in the FSAR at page 17.2-4.

a. In each case, identify the positions of the personnel in question.

b. In each case, describe how and by whom disputes between OQAP and NP personnel are resolved.

23. Identify all personnel who have stop work authority.

a. In each case, explain how and by whom the stop work order may be lifted, both when the originator agrees that it should be lifted and when the originator does not believe the stop work order should be lifted.

Contention II.B.4.

24. What is the Applicants' position with respect to NECNP Contention II.B.4.? State all facts and opinions and identify and provide access to all documents on which this position is based.

25. Identify all individuals whom Applicants expect to call as witnesses with respect to NECNP Contention II.B.4., and identify all documents on which Applicants expect to rely at the hearing with respect to this contention.

26. Describe the actions that will be taken by Applicants to assure that replacement materials and replacement parts incorporated into structures, systems, or components important to safety will be equivalent to the original equipment (or otherwise in compliance with applicable standards and regulations), installed in accordance with proper procedures and requirements, and otherwise adequate to protect the public health and safety.

a. Identify the personnel who will be responsible for this activity.

27. Describe the actions that will be taken by Applicants to assure that repairs or rework carried out on structures, systems, or components important to safety will comply with all applicable standards and regulations.

a. Identify the personnel who will be responsible for this activity.

28. Identify and provide access to all program manuals, implementing procedures, or similar documents that describe who is responsible for carrying out the activities described in response to Questions 26 and 27, when they are to be carried out, and how they are to be accomplished.

Contention II.B.5.

29. What is the Applicants' position with respect to NECNP Contention II.B.5.? State all facts and opinions and identify and provide access to all documents on which that position is based.

30. Identify all individuals whom Applicants expect to call as witnesses with respect to NECNP Contention II.B.5., and identify all documents on which Applicants expect to rely at the hearing with respect to this contention.

31. Identify all positions in the QQAP and explain the functions, responsibilities, and authority of each position.


32. Describe the staffing levels of each position in the QQAP at all times of day and night during reactor operation. In each case, explain why the staffing level is adequate to assure full implementation of the QQAP.

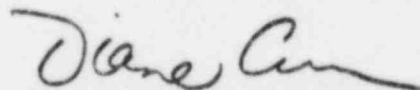
33. Describe the requirements that must be met in order to qualify for each position in the QQAP.

34. Describe the qualifications of all QQAP personnel.

35. Describe the actions that will be taken if personnel are not available for any reason to meet the staffing levels described in response to Question 32.

Respectfully submitted,


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