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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

before the
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PUBLIC SERVICE COMPANY OF NEW)	Docket Nos. 50-443 OL
HAMPSHIRE, et al.)	50-444 OL
)	
(Seabrook Station, Units 1 & 2))	
)	

APPLICANTS' ANSWERS TO
"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"

Pursuant to 10 CFR § 2.7406, the Applicants hereby
respond to the "NECNP First Set of Interrogatories and
Request for Documents to Applicants on Contentions
I.A.2, I.B.1, I.B.1, and I.C," served on them by mail
on October 13, 1982.

GENERAL MATTERS

1. Definitions. The Applicants object to so much of the definition "identify" as is set forth in paragraph 2 under "Instructions for Use" as purports to require the Applicants to set forth the content of documents identified, inasmuch as, since NECNP has requested (or may request) production of identified documents for inspection and copying, an attempt to summarize or duplicate the contents of the document in an answer to an interrogatory is a patently unreasonable and bootless waste of time and effort.

The Applicants object to so much of the same definition as calls for "the present custodian . . . of any and all copies of the document" on the grounds that most of the documents to be identified are published documents and all have been widely circulated, with the result that this request would be unreasonably burdensome and probably impossible to respond to and that the information called for is not relevant to any admitted contention within the meaning of 10 CFR § 2.740(b)(1).

The Applicants object to the definitions contained in paragraph 3 and 4 under the heading "Instructions

for Use" on the grounds that these appear to be incomprehensible and not to be related to any of the interrogatories actually propounded.

2. Production of Documents. The Applicants make the documents for which production is called for available for inspection and copying at one or more appropriate places at a time to be mutually agreed upon by counsel for NECNP and the Applicants.

SPECIFIC INTERROGATORIES

Interrogatory No. 1

Question:

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.

Answer:

The Applicant disagrees with contention II.B.1. FSAR Section 17.2 addresses each of the criteria in Appendix B in sufficient detail to enable an independent reviewer to determine whether and how all of the requirements of Appendix B and the guidance in all applicable Regulatory Guides are satisfied. The most recent amendment to the FSAR expands further on

the applicability of Regulatory Guides. Position is based upon FSAR Section 17.2 as amended.

Interrogatory No. 2.

Question:

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 the Applicants expect to rely at the hearing with respect to this contention.

Answer:

Applicants have not yet determined which, if any, witnesses they will call with respect to this contention.

Interrogatory No. 3

Question:

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.

Answer:

For each of the criteria of Appendix B to 10 CFR Part 50, the section of the FSAR which addresses the criterion is identified as follows:

<u>10 CFR 50, Appendix B Criterion</u>	<u>FSAR Section</u>
1. Organization	17.2.1
2. Quality Assurance Program	17.2.2
3. Design Control	17.2.3
4. Procurement Document Control	17.2.4
5. Instructions, Procedures, and Drawings	17.2.5
6. Document Control	17.2.6
7. Control of Purchased Material, Equipment, and Services	17.2.7
8. Identification and Control of Materials, Parts and Components	17.2.8
9. Control of Special Processes	17.2.9
10. Inspection	17.2.10
11. Test Control	17.2.11
12. Control of Measuring and Test Equipment	17.2.12
13. Handling Storage and Shipping	17.2.13
14. Inspection, Test, and Operating Status	17.2.14
15. Nonconforming Materials, Parts, or Components	17.2.15
16. Corrective Action	17.2.16
17. Quality Assurance Records	17.2.17
18. Audits	17.2.18

The FSAR Section 17.2 and Chapter 13 as amended describe who is responsible for carrying out the operations Quality Assurance Program in compliance with Appendix B to 10 CFR 50, when the various actions are to be carried out, and how the applicable requirements of Appendix B will be satisfied.

Interrogatory No. 4

Question:

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.

Answer:

The applicant disagrees. The Quality Assurance organization has the independence required by Criterion 1 of 10 CFR 50, Appendix B. This position is based on FSAR Section 17.2 as amended.

Interrogatory No. 5

Question:

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.

Answer:

Applicants have not yet determined which, if any, witnesses they will call with respect to this contention.

Interrogatory No. 6

Question:

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.

Answer:

The responsibilities and functions of the Executive Vice President - Engineering and Production are described in FSAR Sections 17.2.1.1, 17.2.1.2, and 13.1 as amended.

Interrogatory No. 7

Question:

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

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

Answer:

Amendment 46 to the FSAR removed this position from functional responsibilities related to Seabrook Station. A new position, the Vice President - Nuclear Production, has been created and is fully described in FSAR Section 13.1.1.

Interrogatory No. 8

Question:

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

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

Answer:

The responsibilities and functions of the Nuclear Quality Manager are as described in FSAR Sections 17.2.1.2, 17.2.1.3, and 13.1.1 or as amended in subsequent revisions.

Interrogatory No. 9

Question:

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

a. Describe the daily activities of the Quality Supervisor.

Answer:

The responsibilities and functions of the Quality Supervisor are as described in FSAR Sections 17.2.1.3 or as amended in subsequent revisions.

Interrogatory No. 10

Question:

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

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

Answer:

The position of Nuclear Production Superintendent no longer exists. The FSAR has been amended to reflect this change.

Interrogatory No. 11

Question:

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

a. Describe the daily activities of the Station Manager.

Answer:

The responsibilities and functions of the Station Manager and pertinent activities are described in FSAR Sections 17.2.1.3 and 13.1.2 or as amended.

Interrogatory No. 12

Question:

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.

Answer:

The position of the Nuclear Production Operations Support Manager no longer exists. This position has

been replaced by the position of the Nuclear Services Manager which is described in FSAR Section 13.1.1.

Interrogatory No. 13

Question:

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

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

Answer:

The responsibilities and functions of the Nuclear Production Engineering Manager are as described in FSAR Sections 17.2.1 and 13.1.1 or as amended.

Interrogatory No. 14

Question:

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

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

Answer:

The responsibilities and functions of the Training Center Manager are as described in FSAR Sections 17.2.1 and 13.1.1 or as amended.

Interrogatory No. 15

Question:

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

a. Describe the daily activities of the Compliance Manager.

Answer:

The responsibilities and functions of the Compliance Manager are as described in FSAR Sections 17.2.1 and 13.1.2 or as amended.

Interrogatory No. 16

Question:

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 relationship.

Answer:

An organization chart for the operational Quality Assurance Program, showing the relationship of PSNH QA, and all other aspects of the operation of Seabrook is included in the FSAR Figures 13.1-1 through 13.1-6 and 17.2-1 through 17.2-3 or as amended.

Interrogatory No. 17

Question:

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.

Answer:

The duties of the Executive Vice President - Engineering and Production are as described in FSAR Section 17.2.1 and 13.1.1 or as amended.

Interrogatory No. 18

Question:

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.

Answer:

The position of the Vice President - Production has been replaced by the position of Vice President - Nuclear Production. The duties of the Vice President - Nuclear Production are as described in FSAR Section 17.2.1 and 13.1.1 or as amended.

Interrogatory No. 19

Question:

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.

Answer:

The position of the Vice President - Production has been replaced by the position of Vice President - Nuclear Production. There are no specific disputes referred to and no specific personnel between whom disputes are anticipated.

Interrogatory No. 20

Question:

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.

Answer:

An appeal would be initiated as described in FSAR Section 17.2.1 as amended.

Interrogatory No. 21

Question:

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.

Answer:

The FSAR Section 17.2 will be amended to identify each situation in which personnel in the OQAP report to personnel with any duties outside the OQAP.

Interrogatory No. 22

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.

Answer:

Interactions are as identified in the FSAR Section 17.2. We cannot identify each situation in which personnel may interact.

Interrogatory No. 23

Question:

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.

Answer:

The personnel who have stop work authority are identified in FSAR Section 17.2.1 or as amended. These same personnel have the authority to lift the stop work order.

Interrogatory No. 24

Question:

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.

Answer:

The Applicant disagrees with NECNP Contention II.B.4. FSAR Section 17.2 demonstrates that the

Applicant will assure that replacement materials and replacement parts incorporated into structures, systems, or components important to safety will be equivalent to the original equipment, installed in accordance with proper procedures and requirements, and are otherwise adequate to protect the public health and safety. Similarly, the Quality Assurance Program does assure and demonstrate that repaired or reworked structures, systems, or components will be adequately inspected and tested during and after the repair or rework and documented in "As-built" drawings. This position is documented in FSAR Section 17.2.

Interrogatory No. 25

Question:

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.

Answer:

Applicants have not yet determined which, if any, witnesses they will call with respect to this contention.

Interrogatory No. 26

Question:

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.

Answer:

The actions that will be taken by the applicant to assure that replacement materials and replacement parts incorporate 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 and the personnel who will be responsible for this activity are described in FSAR Section 17.2.4 and 17.2.7 or as revised.

Interrogatory No. 27

Question:

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.

Answer:

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 and the personnel who will be responsible for this activity are described in FSAR Section 17.2.3, 17.2.10, and 17.2.12.

Interrogatory No. 28

Question:

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.

Answer:

The FSAR Section 17.2 describes the responsibilities 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. Program manuals and implementing procedures will be developed in the future to meet the requirements of FSAR Section 17.2. These procedures will be made available when approved.

Interrogatory No. 29

Question:

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.

Answer:

The Applicant disagrees with Contention II.B.5. The Quality Assurance program for operations as described in FSAR assures the presence on the operating staff of an adequate number of qualified QA/QC personnel, including the offshift period.

Interrogatory No. 30

Question:

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.

Answer:

Applicants have not yet determined which, if any, witnesses they will call with respect to this contention.

Interrogatory No. 31

Question:

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

Answer:

The positions in the OQAP are identified in the OQAP and in Chapter 13 of the FSAR.

Interrogatory No. 32

Question:

32. Describe the staffing levels of each position in the OQAP 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 OQAP.

Answer:

The staffing levels of each position in the OQAP is described in the OQAP and Chapter 13 of the FSAR.

Interrogatory No. 33

Question:

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

Answer:

The requirements that must be met in order to qualify for each position in the OQAP are described in FSAR Section 17.2-1, Appendix 17A, and Chapter 13 or as amended.

Interrogatory No. 34

Question:

34. Describe the qualifications of all OQAP personnel

Answer:

The qualifications of all OQAP personnel are described in FSAR Chapter 13 and 17 or as amended.

Interrogatory No. 35

Question:

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.

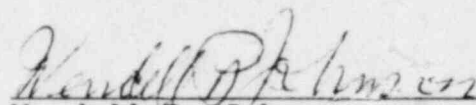
Answer:

The Applicant does not expect to find personnel unavailable to meet staffing levels.

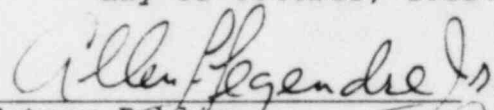
Signatures

As to Answers:

I, Wendell P. Johnson, being first duly sworn, do depose and say that the foregoing answers are true, expect insofar as they are based on information that is available to the Applicants but not within my personal knowledge, as to which I, based on such information, believe them to be true.


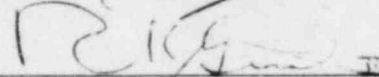

Wendell P. Johnson

Sworn to before me this
day of October, 1982:


Notary Public
My Commission expires: August 5, 1988



As to objections:



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CERTIFICATE OF SERVICE

I, Robert K. Gad III, one of the attorneys for the Applicants herein, hereby certify that on November 1, 1982 I made service of the within "Applicants' Answers to 'NECNF First Set of Interrogatories and Request for Documents to Applicants on Contention II.B.1, II.B.3, II.B.4, and II.B.5'" by mailing copies thereof, postage prepaid, to:

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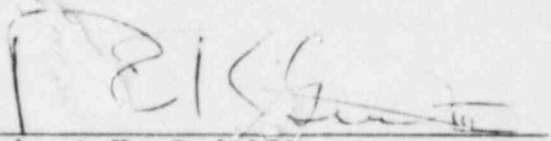
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