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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

MAY 10 P4:16

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of

VERMONT YANKEE NUCLEAR
POWER CORPORATION

(Vermont Yankee Nuclear
Power Station)

)
)
) Docket No. 50-271-OLA-4
) (Operating License
) Extension)
)
)

DOCUMENT PRODUCTION REQUESTS
PROPOUNDED BY THE STATE OF VERMONT
TO THE
VERMONT YANKEE NUCLEAR POWER CORPORATION
(Set No. 1)

Pursuant to 10 C.F.R. § 2.741, the State of Vermont hereby propounds the following document production requests to the Vermont Yankee Nuclear Power Corporation.

DEFINITIONS

1. "Document" as used herein is used in its broadest sense as expressed in Rule 34(a) of the Federal Rules of Civil Procedure, and specifically includes copies of every instrument or device by which, through which, or on which information has been recorded, including those reflecting meetings, discussions or conversations: notes; letters; memoranda (including internal Vermont Yankee Nuclear Power Corporation memoranda); manifests; tables; drawings; files; graphs; charts; maps; photographs; deeds; studies; data sheets; notebooks; books; appointment calendars; telephone bills; telephone messages; receipts; vouchers; minutes of meetings; pamphlets; computations; calculations; accounting statements; financial statements; voice recordings; computer printouts and disks; or any other device or media on which or through which information of any type is transmitted, recorded, or preserved. The term "document" also means every copy of a document when such copy is not an identical duplicate of the original.

2. "Person" as used herein is used in its broadest sense to include natural persons, public or private corporations and their subsidiaries or divisions, proprietorships, partnerships, governmental entities, associations, organizations, groups,

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trusts, estates and any other form of entity. Any reference herein to any "person," whether or not a party herein, that is a corporation, partnership, or any entity other than a natural person, shall be construed as including all past and present officers, directors, employees, and agents or members of the Board of Directors of the entity.

3. "Vermont Yankee" and "licensee" each refer to Vermont Yankee Nuclear Power Corporation, its predecessors, successors, parents, subsidiaries, affiliates, segments or divisions, including all past and present officers, directors, employees, agents or members of the Board of Directors of Vermont Yankee.

4. "Vermont Yankee plant" refers to the Vermont Yankee Nuclear Power Station.

5. The term "identify" means describe with particularity and provide the following information:

(a) When used with reference to a natural person, state his or her full name and present (or last known) business and residential addresses, present (or last known) business and residential telephone numbers, present (or last known) business affiliation, and employment position and relationship to Vermont Yankee at the time of the act to which the interrogatory relates;

(b) When used with reference to any entity other than a natural person, state its full name, the address of its principal place of business and its organizational form;

(c) When used with reference to a document, state its type (e.g., letter, contract, chart, memorandum), date, author(s), the name and address of each addressee, its title or heading, its substance, its present (or last known) location and custodian, the identity of each person to whom a copy was sent, and the date of such transmittal; and

(d) When used with regard to a communication, state the identity of each person making, receiving or present during the communication, the date and location of the communication, the substance of the communication, the manner in which the communication was made and, in the case of a written communication, the identity of the document comprising the communication.

6. "The application" refers to Vermont Yankee letter to NRC, BVY 89-41 of April 27, 1989, Proposed Amendment to Vermont Yankee Operating License to Extend the License Expiration to 40 years from Date of Issuance.

7. "Structures, systems, and components," unless otherwise qualified, refers to structures, systems, and components (and their supporting systems) whose failure could significantly affect the safety or security of the facility, and which are included in the plant's current licensing basis. This includes those systems, structures, and components (a) relied upon for the integrity of the reactor coolant pressure boundary,

safe shutdown capability, and accident prevention and mitigation; (b) whose failure can cause or adversely affect a transient or accident that significantly challenges structures, systems and components relied upon for the integrity of the reactor coolant pressure boundary, safe shutdown, or accident mitigation; and (c) other structures, systems and components not included above that provide reasonable assurance that the facility can be operated without undue risk to the public and plant personnel health and safety or to common defense and security (Draft Regulatory Guide DG-1001, Section C.1).

8. "Components" refers to items from which equipment is assembled (for example, attachments, bearings, bolts, capacitors, connectors, governors, inspection access ports, instrument sensors, locking devices, position indicators, resistors, seals, sight glasses, springs, switches, transistors, tubes, wires, etc.), or to items from which systems are assembled (for example, piping, valves, pumps, heat exchangers, strainers, instrumentation, etc.).

9. "Equipment" refers to an assembly of components designed and manufactured to perform specific functions.

10. "Safety-related" structures, systems and components refers to structures, systems and components that are relied upon to remain functional during and following design basis events to ensure (i) the integrity of the reactor coolant pressure boundary, (ii) the capability to shut down the reactor and maintain it in a safe shutdown condition, and (iii) the capability to prevent or mitigate the consequences of accidents that could result in potential offsite exposures comparable to the 10 CFR Part 100 guidelines. Design basis events are defined as conditions of normal operation, including anticipated operational occurrences, design basis accidents, external events, and natural phenomena for which the plant must be designed to ensure functions (i) through (iii) above. (10 CFR 50.49(b)(1))

11. "Nonsafety-related" structures, systems and components refers to all structures, systems and components that are not safety-related.

12. "Current licensing basis," refers to the original licensing basis as described in the licensee's Final Safety Analysis Report (FSAR), plus those additional requirements that have been made by the licensee during the period of plant operation up to the present. This includes, but is not limited to, plant-specific compliance with the Commission regulations as prescribed in parts 2, 19, 20, 21, 30, 40, 50, 51, 55, 72, 73, 100, and the appendices thereto of title 10 of the Code of Federal Regulations; orders; license conditions; exemptions; adjudicatory decisions; and written commitments made in correspondence such as responses to NRC bulletins and generic letters and other licensee correspondence (54 FR 4194).

13. "Qualified life" refers to the period of time, prior to the start of a design basis event, for which the structure, system or component was demonstrated to meet the design requirements for the specified service conditions.

14. "Design life" refers to the time during which satisfactory performance can be expected for a specified set of service conditions.

15. "Installed life" refers to the interval from installation or construction to removal during which the structure, system or component may be subject to design service conditions and system demands.

16. "Environmental conditions" refer to temperature, pressure, humidity, radiation, chemicals, and submergence in the area or, for the equipment/components in question.

17. "Mild environment" refers to an environment that would at no time be significantly more severe than the environment that would occur during normal plant operation, including anticipated operational occurrences (10 CFR 50.49 (c)).

18. "Harsh environment" refers to an environment that is not a mild environment.

19. "Vermont Interrogatory (Set No. 1)" refers to Interrogatories Propounded by the State of Vermont to the Vermont Yankee Nuclear Power Corporation (Set. No. 1), dated April 27, 1990.

INSTRUCTIONS

1. The response to each Document Request is to be numbered in a manner consistent with these Document Requests.

2. In responding to these Document Requests, furnish all responsive information that is available to Vermont Yankee, including information that is in the possession of any of Vermont Yankee's officers, employees, agents, contractors, consultants, assigns and attorneys or otherwise subject to Vermont Yankee's custody or control.

3. If any requested document was but is no longer in your possession or subject to your control, state what disposition was made of it.

4. If any Document Request cannot be provided in full, it shall be provided to the extent possible, and an explanation shall be given as to why a full provision is not possible.

5. If only part of a document is responsive to a Document Request and the entire document is produced, the responsive section of the document shall be indicated.

6. If anything is deleted from a document produced in response to a

Document Request, Vermont Yankee shall state the reason for the deletion and the subject matter of the deleted material.

7. If any requested document or information is withheld pursuant to an objection or claim of privilege, Vermont Yankee shall identify the specific Document Request (including subparagraph) requesting the withheld document or information, state the nature of the objection or privilege and the precise grounds upon which the objection is made or the privilege is claimed.

8. If an objection is made or a privilege is claimed as to any requested information, identify each person who has knowledge of such information.

9. If any document is not produced because Vermont Yankee has not retained it or because it is being withheld pursuant to an objection or claim of privilege, Vermont Yankee shall identify the document by stating:

- (a) the name(s) and affiliation(s) of the document's author(s) or originator(s);
- (b) the name(s) and affiliation(s) of the document's addressee(s);
- (c) the document's date;
- (d) the document's title or heading;
- (e) the document's type (e.g., letter, contract);
- (f) the document's subject matter;
- (g) the name(s) and affiliation(s) of the present or last known custodian(s) of the original document or copies thereof;
- (h) the current or last known business and residential addresses of such custodian(s); and
- (i) the name(s) and affiliation(s) of all recipients . . . of the document.

10. If any Document Request is objected to in part, for any reason, the remainder of the Document Request is to be provided in full.

11. All responses must be supplemented as provided for in 10 C.F.R. § 2.740(e).

12. Documents are requested for production for inspection and copying in accordance with 10 C.F.R. § 2.741. The term "provide" is used for documents which are not voluminous and for which Vermont accepts the cost of copying; it is expected that copies of such documents will be forwarded with your response. Should for any reason these documents not be provided as requested, they shall be produced for inspection and copying.

DOCUMENT PRODUCTION REQUESTS

1. Please identify all persons who participated in the preparation of answers to these document production requests. Identify the specific portions of each

response to which each person contributed.

2. For each and every supervisor who has been responsible for maintenance and surveillance activities at the Vermont Yankee plant at any time since January 1, 1988, as identified in response to Vermont Interrogatory (Set No. 1) No. 2, please produce for inspection and copying all personnel files, including, but not limited to, performance evaluations, ratings by supervisors, qualification records, and training records and test scores.
3. For each and every Vermont Yankee employee who has been responsible for or has performed maintenance or surveillance activities at the Vermont Yankee plant at any time since January 1, 1988, as identified in response to Vermont Interrogatory (Set No. 1) No. 3, please produce for inspection and copying all personnel files, including, but not limited to, performance evaluations, ratings by supervisors, qualification records, and training records and test scores.
4. For each and every contract employee who has been responsible for or has performed maintenance or surveillance activities at the Vermont Yankee plant at any time since January 1, 1988, as identified in response to Vermont Interrogatory (Set No. 1) No. 4, please produce for inspection and copying all personnel files, including, but not limited to, performance evaluations, ratings by Vermont Yankee personnel, qualification records, and training records and test scores.
5. For each and every licensed control room operator, senior control operator, and shift supervisor who is currently employed at the Vermont Yankee plant, or has been in your employ at any time since January 1, 1988, as identified in response to Vermont Interrogatory (Set No. 1) No. 5, please produce for inspection and copying all personnel files, including, but not limited to, performance evaluations, ratings by supervisors, qualification records, and training records and test scores.
6. Please produce for inspection and copying all documents setting forth the current licensing basis for each structure, system and component of the Vermont Yankee plant, identified in response to Vermont Interrogatory (Set No. 1) No. 6. If in response to Vermont Interrogatory (Set No. 1) No. 6 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
7. For structures, systems and components for which the current licensing basis is different from the licensing basis when the Vermont Yankee plant was originally granted its operating license, produce for inspection and copying each and every document, identified in response to Vermont Interrogatory (Set No. 1) No. 7, which caused the licensing basis to change from its original basis. If in response to Vermont Interrogatory (Set No. 1) No. 7

Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.

8. For each and every person who has been responsible for reviewing maintenance requests or work orders with regard to the current licensing basis of structures, systems and components, or with regard to the regulatory or safety impact of the request, at the Vermont Yankee plant, at any time since January 1, 1988, as identified in response to Vermont Interrogatory (Set No. 1) No. 8, please produce for inspection and copying all personnel files, including, but not limited to, performance evaluations, ratings by supervisors, qualification records, and training records and test scores.
9. For the review of maintenance requests and work orders referenced in the foregoing document production request:
 - a. If the current licensing basis maintained in a central location, accessible to personnel responsible for maintenance review, produce the documents from this location for inspection and copying.
 - b. If the current licensing basis is distributed by a controlled distribution, produce for inspection and copying the procedure by which these documents are controlled, and current and past copies of these current licensing basis documents.
 - c. If the current licensing basis is maintained in a format accessible by computer, please produce for inspection and copying the procedure by which this computer data base is controlled, and provide access to the data base for inspection and print out.
 - d. If the current licensing basis is maintained for the maintenance reviewer by a method described in sub-part f of Vermont Interrogatory (Set No. 1) No. 9, please produce for inspection and copying all documents which the maintenance reviewer uses to perform the review with regard to the current licensing basis or the regulatory or safety impact of the maintenance request.
10. Please produce for inspection and copying all the results of quality assurance audits since January 1, 1988, identified in response to Vermont Interrogatory (Set No. 1) No. 10, which reviewed the adequacy of the process of reviewing maintenance requests or work orders with regard to the current licensing basis or regulatory or safety impact. These results include, but are not limited to, audit reports, reports to management, audit check lists, informal check lists and hand written notes. If in response to Vermont Interrogatory (Set No. 1) No. 10 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.

11. Produce for inspection and copying all the results of quality assurance audits since January 1, 1988, identified in response to Vermont Interrogatory (Set No. 1) No. 11, which reviewed the adequacy of the process of maintaining the current licensing basis in a current and correct condition. These results include, but are not limited to, audit reports, reports to management, audit check lists, informal check lists and hand written notes. If in response to Vermont Interrogatory (Set No. 1) No. 11 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
12. Please provide a copy of the set of documents provided to NRC inspectors as requested by Appendix 1 of Inspection Report No. 50-271/89-80 (also attached as Appendix 1 to Vermont Interrogatories (Set No. 1).
13. Please produce for inspection and copying all documents which were requested by Appendix 1 of Inspection Report No. 50-271/89-80, but which were not copied for NRC, and all other documents which were reviewed by NRC maintenance team inspectors, identified in response to Vermont Interrogatory (Set No. 1) No. 12. (The intent of this request is to produce all documents provided to or reviewed by the maintenance team inspectors.) If in response to Vermont Interrogatory (Set No. 1) No. 12 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
14. Please produce for inspection and copying each document revised since the maintenance team inspection, identified in response to Vermont Interrogatory (Set No. 1) No. 13. If in response to Vermont Interrogatory (Set No. 1) No. 13 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
15. Please produce for inspection and copying each and every document in addition to those in document production request 12 above, which comprises the maintenance program upon which the licensee relies for the license extension, as identified in response to Vermont Interrogatory (Set No. 1) No. 14. If in response to Vermont Interrogatory (Set No. 1) No. 14 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
16. Please provide copies of the maintenance documents produced since or as a result of the maintenance team inspection, as identified in response to Vermont Interrogatory (Set No. 1) No. 15. If in response to Vermont Interrogatory (Set No. 1) No. 15 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.

17. Please produce for inspection and copying the following documents, generated or originated from January 1, 1985 to the present:
 - a. All maintenance requests
 - b. All nonconformance Reports (NCRs)
 - c. All Licensee Event Reports (LERs), and evaluation material (PRO's, PORC minutes, etc.)
 - d. All Engineering Design Change Requests (EDCRs)
 - e. All Plant Design Change Requests (PDCRs)
 - f. All Plant Alteration Requests (PARs)
 - g. All Temporary Modifications (TMs)
 - h. All Temporary Mechanical Bypass Requests (MBRs)
 - i. All Temporary Lifted Lead and Jumper Requests (LL/JRs)
 - j. All Potential Reportable Occurrence Reports (PROs)
 - k. All Plant Information Reports (PIRs)
 - l. All Plant Performance Monitoring Memoranda
18. Please provide a copy of the index to the maintenance and surveillance records ("The Visicard system") for each Vermont Yankee plant structure, system and component, and produce for inspection and copying the surveillance and maintenance records system for each plant structure, system and component. Included in this request are the surveillance and maintenance records referred to in Section 3.2.2.3 of Attachment 2 of the application.
19. Please provide a copy of the index for vendor technical manuals, and produce the vendor technical manuals for inspection and copying.
20. For the vendor manual update program at the Vermont Yankee plant:
 - a. Produce for inspection and copying the procedure which governs the Vendor Manual Update Program.
 - b. Produce for inspection and copying the documentation of the results of the quality assurance audits relating to vendor manuals or the vendor manual update program, including audit reports, reports to management, audit check lists, handwritten check lists, and informal notes, as identified in response to Vermont Interrogatory (Set No. 1) No. 16, sub-part d. If in response to Vermont Interrogatory (Set No. 1) No. 16, sub-part d. Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
21. Please produce for inspection and copying all documents related to the "Computerized Maintenance Material Management System (CMMMS)" referred to in BVY 89-75, including, but not limited to, the development

plan referred to in BVY 89-75, all assessment documentation referred to in BVY 89-86, the system description, bid specification, purchase specification, and all internal and external correspondence, with all attachments.

22. If bids have been received for the CMMMS identified in the foregoing document production request, but the supplier has not been chosen, please produce for inspection and copying the technical description portions (exclusive of financial portions) of each bid.
23. Please produce for inspection and copying all documents related to containment integrity testing (i.e., testing in accordance with 10 CFR 50, Appendix J) during the life of the Vermont Yankee plant, including, but not limited to, all test reports, licensee event reports, test results, calibration records, internal memoranda, maintenance requests, correspondence, and contractor records.
24. Please provide a copy of "the plant master equipment list for safety-related equipment" that is referenced in Enclosure 1 of BVY 89-75.
25. Please provide a copy of the current or most recent Master Equipment List for Environmentally Qualified (EQ) equipment that is referenced in Enclosure 1 of BVY 89-75.
26. Please provide a copy of the index for all environmental qualification documentation reports and qualification worksheets prepared in accordance with 10 CFR 50.49.
27. Please produce for inspection and copying the reports and qualification worksheets listed on the index in the foregoing document production request. Include the reports and worksheets referred to in Section 3.2.2.2 of Attachment 2 of the application.
28. Please produce for inspection and copying all documents identified as references in the qualification documentation reports produced in response to the foregoing document production request.
29. Please provide copies of all documents which identify the environmental conditions of each area of the Vermont Yankee plant evaluated as part of your 10 CFR 50.49 evaluation, including those areas considered to be mild environments.
30. Please provide copies of all documents not provided as part of the foregoing document production request which identify the environmental conditions of each area of the Vermont Yankee plant which houses systems or components "whose failure can cause or adversely affect a transient or accident that significantly challenges structures, systems and components relied upon for the integrity of the reactor coolant pressure boundary, safe

shutdown, or accident mitigation" (quoted from sub-part (b) of the definition of structures, systems and components).

31. Please produce for inspection and copying:

- a. All documents identified in response to Vermont Interrogatory (Set No. 1) No. 25, sub-part b, which indicate the bases for the qualified life, design life and installed life of the structures, systems and components.
- b. All documents identified in response to Vermont Interrogatory (Set No. 1) No. 25, sub-part c, which describe the manner in which qualified life, design life or installed life is determined and demonstrated for each structure, system or component.
- c. All written procedures identified in response to Vermont Interrogatory (Set No. 1) No. 25, sub-part d, which govern the determination of qualified life, design life and installed life of each category of equipment.
- d. All documents describing the results of quality assurance audits since January 1, 1988, which reviewed the adequacy of the process of determining qualified life or design life of structures, systems and components including audit reports, audit check lists, informal check lists and handwritten notes.

If in response to Vermont Interrogatory (Set No. 1) No. 25 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.

32. Please produce for inspection and copying all documents available to you providing failure rate information on the structures, systems and components of the plant. Include documents which contain industry wide information, as well as documents which contain information specific to the Vermont Yankee plant.
33. Please produce for inspection and copying the failure rate data base being used for the IPE evaluation referred to in BVY 89-100.
34. Please produce for inspection and copying all purchase specifications for Vermont Yankee plant structures, systems and components. Provide a copy to the index for these specifications.
35. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 28, establishing procurement quality control requirements for the structures, systems and components of the Vermont Yankee plant. If in response to Vermont Interrogatory (Set No. 1) No. 28 Vermont Yankee has not identified any or

all documents requested to be identified by that interrogatory. produce for inspection and copying all such documents.

36. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 29, which demonstrate that the procurement quality control requirements were satisfactorily completed. If in response to Vermont Interrogatory (Set No. 1) No. 29 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
37. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 30, establishing construction quality control and quality assurance requirements for the structures, systems and components of the Vermont Yankee plant. If in response to Vermont Interrogatory (Set No. 1) No. 30 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
38. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 31, which demonstrate that the construction quality control and quality assurance requirements were satisfied. If in response to Vermont Interrogatory (Set No. 1) No. 31 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
39. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 32, establishing inservice testing and inservice inspection requirements for the structures, systems and components of the Vermont Yankee plant. If in response to Vermont Interrogatory (Set No. 1) No. 32 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
40. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 33, which demonstrate that the inservice testing and inservice inspection requirements were satisfactorily completed. Specifically include the records of inspections completed under the ISI Program referred to in Section 3.2.2.1 of Attachment 2 of the application. If in response to Vermont Interrogatory (Set No. 1) No. 33 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
41. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 35, establishing the

storage requirements for each structure, system and component, before installation. If in response to Vermont Interrogatory (Set No. 1) No. 35 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.

42. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 36, establishing the procedures which established storage methods during the construction period. If in response to Vermont Interrogatory (Set No. 1) No. 36 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
43. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 37, establishing the procedures which have established storage methods for structures, systems and components since initial operation. If in response to Vermont Interrogatory (Set No. 1) No. 37 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
44. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 38, which verify the manner in which structures, systems and components are stored prior to installation. If in response to Vermont Interrogatory (Set No. 1) No. 38 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
45. Please produce for inspection and copying all documentation of quality assurance audits of the storage methods during the construction period, as identified in response to Vermont Interrogatory (Set No. 1) No. 40. If in response to Vermont Interrogatory (Set No. 1) No. 40 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
46. Please produce for inspection and copying all documents containing information regarding the environmental conditions which structures, systems and components of the Vermont Yankee plant experienced during the period between the construction period date and the operating license date. Include all available information on pressure-temperature histories for storage locations and for as-installed in-plant environmental conditions before operation.
47. Please provide copies of all Quality Assurance Department Trend Reports identified in BVY 89-86.

48. Please provide a copy of Vermont Yankee's "complete, independent reassessment of the subject [INPO list of 125 Significant Operating Event Reports] SOER's as well as the governing review process" (quoted from BVY 89-86).
49. For the activity of reconstituting the design basis, as described by Mr. Donald Reid at the meeting with NRC Region I in King of Prussia, PA, on January 26, 1989:
 - a. Please produce for inspection and copying the procedure by which the design basis reconstitution activity is controlled.
 - b. Please produce for inspection and copying all documents containing or describing the work product from the design basis reconstitution activity.
50. Please produce for inspection and copying all documents describing the external events and natural phenomena for which the Vermont Yankee plant is designed, for each of the design conditions and design basis events.
51. Please produce for inspection and copying all documents related to any safety system functional inspections (SSFIs) performed for the Vermont Yankee plant. This request includes, but is not limited to, all internal correspondence and correspondence with Westec Incorporated, or other contractors; all Westec Incorporated inspection results, records, data sheets, findings, internal memoranda; all documentation related to resolution of inspection findings; and the SSFI reports.
52. Please produce for inspection and copying INPO reports identifying or containing reliability information of Vermont Yankee plant-specific equipment, including those documents identifying the Vermont Yankee Uninterruptible Power Supply (UPS) as a reliability outlier.
53. Please provide a copy of the Yankee Atomic Electric Company Operational Quality Assurance Manual (YOQAP-1-A) and a copy of the Vermont Yankee Safety Classification Manual, referred to in Section 3.2.2.1 of Attachment 2 of the application.
54. Please produce for inspection and copying all procedures applicable to requalifying components to a longer service life, as stated in Sections 3.2.2.2 and 3.4.3 of Attachment 2 of the application.
55. Produce for inspection and copying each document identified in response to Vermont Interrogatory (Set No. 1) No. 50, identifying the location of each vendor recommendation for each structure, system and component. If in response to Vermont Interrogatory (Set No. 1) No. 50 Vermont Yankee has

not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.

56. Produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 1) No. 52, sub-part c, which are part of the evaluation or justification for not precisely following vendor recommendations. If in response to Vermont Interrogatory (Set No. 1) No. 52, sub-part c, Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
57. Produce for inspection and copying all procedures, policy statements and memoranda providing direction or instructions regarding following vendor recommendations for maintenance or vendor recommendations for maintaining qualified life or design life.
58. Please produce for inspection and copying all procedures guiding personnel in the determination of failure and root cause analysis.
59. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 57, explaining the method by which failure and root cause evaluations are performed and documenting these evaluations. If in response to Vermont Interrogatory (Set No. 1) No. 57 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for inspection and copying all such documents.
60. Please produce for inspection and copying all documents describing training modules, courses, or training segments which train personnel to perform failure and root cause evaluations.
61. Please produce for inspection and copying all instructions, policy guidances, and memoranda which have been operative since January 1, 1988, to provide guidance or instructions to personnel performing root cause evaluations.
62. Please produce for inspection and copying all procedures guiding personnel in the determination of the safety consequences and implications of the failure, inoperability or degradation of structures, systems and components, or of procedural inadequacies.
63. Please produce for inspection and copying all documents as identified in response to Vermont Interrogatory (Set No. 1) No. 62, explaining the method by which the safety consequences and implications of failure, inoperability or degradation of structures, systems and components are performed and documenting these evaluations. If in response to Vermont Interrogatory (Set No. 1) No. 62 Vermont Yankee has not identified any or all documents requested to be identified by that interrogatory, produce for

inspection and copying all such documents.

64. Please produce for inspection and copying all documents describing training modules, courses, or training segments which train personnel to perform the evaluation of safety consequences and implications of failures, inoperabilities and degradations of structures, systems and components.
65. Please produce for inspection and copying all instructions, policy guidances, and memoranda which have been operative since January 1, 1988, to provide guidance or instructions to personnel performing the evaluation of safety consequences and implications of failures, inoperabilities and degradations of structures, systems and components.
66. For each occurrence in which Vermont Yankee plant equipment has been modified because it has become obsolete, as referred to in Section 3.3.2 of Attachment 2 of the application, please produce for inspection and copying all documentation describing the method by which the determination of obsolescence was made.
67. For each occurrence in which Vermont Yankee plant equipment has been modified because it has reached its end-of-useful life, as referred to in Section 3.3.2 of Attachment 2 of the application, please produce for inspection and copying all documentation describing the method by which the determination of end-of-useful life was made.
68. Please provide copies of all trend analyses for safety-related electrical equipment not covered by the Equipment Qualification Program, referred to in Section 3.4.3 of Attachment 2 of the application.
69. Please produce for inspection and copying the strict construction procedures referred to in Section 3.4.4.1 of Attachment 2 of the application.
70. Please produce for inspection and copying all documents describing the good maintenance practices for corrosion prevention, concrete surface repair and protective coating upkeep, referred to in Sections 3.4.4.1 and 3.5 of Attachment 2 of the application.
71. Please produce for inspection and copying the 18 references identified in Enclosure A, "Containment Paint Evaluation Basis," of BVY 89-69.
72. Please provide a copy of Operations Department Primary Containment Surveillance procedure OP 4115, and produce for inspection and copying all documentation of surveillances, including, but not limited to, all generated documentation on VYOPF 4115.06, as referenced on page 2 of Enclosure A of BVY 89-69.
73. Please produce for inspection and copying, all surveillances of containment

performed under OP 4115, and all surveillances performed or documented under earlier procedures or methods.

74. Please provide copies of all results and documentation of the inspections of paint scraping activities for drywell and torus, referenced on page 5 of Enclosure A of BVY 89-69.
75. Please produce for inspection and copying all documents describing the design of the strainers for the core spray, RHR, HPCI and RCIC pump suctions.
76. Please produce for inspection and copying all procurement specifications for the core spray, RHR, HPCI and RCIC pumps.
77. Please produce for inspection and copying all documents which document the minimum net positive suction head for the core spray, RHR, HPCI and RCIC pumps.
78. For any minimum net positive suction head acceptance tests which were required or performed for the core spray, RHR, HPCI and RCIC pumps, please produce for inspection and copying the following:
 - a. All test reports
 - b. All test specifications and procedures by which tests were performed
 - c. All licensee and licensee's agent documentation demonstrating approval of the test specification or test procedure.
79. Please produce for inspection and copying all documents which establish the quality assurance or quality control inspection requirements for the tests identified in the preceding document production request.
80. Please produce for inspection and copying all quality assurance or quality control inspection reports and documentation, and all reviews of test results for the tests identified in document production request 78.
81. Please produce for inspection and copying all calculations which identify the available net positive suction head for the core spray, RHR, HPCI and RCIC pumps.
82. Please provide for inspection and copying all documents which identify the size of the largest particle or debris which the core spray, RHR, HPCI and RCIC pumps, respectively, can pass.
83. Please produce for inspection and copying all documents which establish the original and the current licensing basis for the coating system in the drywell

and torus.

84. Please produce for inspection and copying all codes which govern the coating requirements for the drywell and torus.
85. Please produce for inspection and copying all documentation of the review of maintenance requests which is identified on page 2 of 5 of LER 86-04.
86. Please produce for inspection and copying all documentation of the departmental review of surveillance procedures which is identified on page 5 of 5 of LER 86-04.
87. Please produce for inspection and copying the procedure and documentation of the "closer look [at] drawings and procedures" identified on page 5 of 5 of LER 86-04.
88. Please produce for inspection and copying all documents describing the Vermont Yankee program to determine any significant aging mechanisms for the structures, systems and components of the Vermont Yankee plant, other than harsh environment equipment covered by 10 CFR 50.49.
89. For the Vermont Yankee program to determine any significant aging mechanisms for the structures, systems and components of the Vermont Yankee plant, other than harsh environment equipment covered by 10 CFR 50.49, please produce for inspection and copying all documents which identify the criteria for determining if an aging criteria is significant and all documents which identify the bases for these criteria.
90. Please produce for inspection and copying the Vermont Yankee program policy directive and implementing procedures for qualifying safety system equipment other than those equipment covered by 10 CFR 50.49.
91. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that the paint undercoat (primer) of the drywell and torus will remain intact in the extended period, and that the metal surface will be protected.
92. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that peeling paint in containment will break into small pieces so small they will pass through the pump suction screens and core spray nozzle without causing clogging.
93. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that drywell paint failure in the

extended period will be in the form of small chips which have a higher density than water.

94. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that the comprehensive and formal maintenance program document identified in BVY 89-75 is effective for providing clearly documented objectives, policies, responsibilities, authorities, programmatic controls, and comprehensive and structured reviews of Vermont Yankee plant maintenance requirements, at present, and for the extended period.
95. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that the Computerized Maintenance Material Management System, identified in BVY 89-75, if implemented, will be effective for its intended use in the maintenance program in the extended period.
96. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that a maintenance staff, with the requisite nuclear skills and knowledge, can be retained in the extended period.
97. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that trend analyses will determine decreased equipment reliability and expected life in the extended period.
98. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that all components with service lives less than Vermont Yankee plant service life will be determined and replaced, requalified or upgraded.
99. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that the maintenance and surveillance program in the extended period will be effective in limiting containment leakage to the leakage limits in the current licensing basis.
100. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that age-related degradation of active and passive mechanical components will be identified and corrected by the in-service inspection/testing and maintenance program, and that component

functional capability will be maintained, in the extended period.

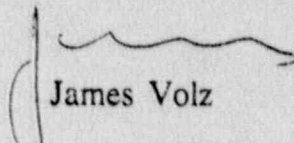
101. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that structural integrity of Vermont Yankee plant structures will be maintained in accordance with the current licensing basis in the extended period.
102. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that any policy and implementing procedures for controlling and updating manufacturer technical manuals, contemplated in BVY 89-75, will be effective for these purposes in the extended period.
103. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that revisions to the Maintenance Request Procedure (AP 0021), contemplated in BVY 89-75, will be effective to control post maintenance testing in the extended period.
104. Please produce for inspection and copying all documents upon which you rely for claiming that there is reasonable assurance (within the meaning of 10 CFR 50.57(a)(3)), if you so claim, that Maintenance Requests for completed maintenance activities will be completed in a timely fashion in the extended period.
105. Please produce for inspection and copying all documents presented to the NRC Maintenance Team to demonstrate the adequacy of Vermont Yankee Plant operability, equipment availability and plant material condition (as described in "overall plant performance" in NRC Temporary Instruction (TI) 2515/97 dated 11/03/88).
106. Please produce for inspection and copying all documents which provide information to show that paint failure in the drywell and torus will not fail in sheets rather than chips when exposed to radiation, temperatures, steam, and chemical conditions postulated for design basis accidents.
107. Please produce for inspection and copying all documents which demonstrate that coating/paints will not experience sheet-mode failures similar to coating failures identified in NRC Information Notice 85-24 and INPO SER 68-83.
108. Please produce for inspection and copying all documents which Vermont Yankee has reviewed or otherwise has relied on regarding coating and paint failures identified in NRC Information Notice 85-24 and INPO SER 68-83.
109. Please produce for inspection and copying all files documenting review of

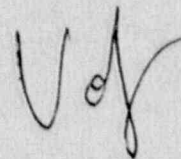
the industry safety issues identified in Section 2.3.6 of IR 89-80.

110. Please identify, and produce for inspection and copying, all documents presented to the NRC Maintenance Team to demonstrate the adequacy of the following aspects of "Maintenance Implementation," stated in NRC Temporary Instruction (TI) 2515/97 dated 11/03/88, and which were not described in IR 89-80:
 - a. Work prioritization
 - b. Backlog controls
 - c. Maintenance procedures
111. Please identify, and produce for inspection and copying, all documents relied upon during, and all documents created as a result of, the investigation of the scratches on machined surfaces inside the "B" diesel generator engine, noted in paragraph 3.10 of IR 89-80.
112. Please identify, and produce for inspection and copying, all documents presented to the NRC Maintenance Team to demonstrate that having no Master Equipment List caused no confusion, as concluded in paragraph 3.10 of IR 89-80.
113. Please identify, and produce for inspection and copying, all procedures which contain requirements for post maintenance testing.
114. Please identify, and produce for inspection and copying, all documents presented to the NRC Maintenance Team to demonstrate the adequacy of aspects of "Plant Maintenance Organization" and specifically the Corrective Action System (specified under deficiency Identification, Control and Corrective Action System and Support Interfaces specified by TI 2515/97).
115. Please identify, and provide copies of, all documents relating to failure data and trending for the 24 components mentioned in Paragraph 3.2 of IR 89-80.
116. Please identify, and produce for inspection and copying, all documents which describe Vermont Yankee's methods for upgrading material to a higher safety classification than originally specified in the purchase order, as noted in paragraph 3.3 of IR 89-80.
117. Please identify, and produce for inspection and copying, all documents, including but not limited to all written and verbal correspondence with vendors, relating to the root cause analyses for Vermont Yankee's containment leak rate problems described in LER 89-07.

118. Please identify, and produce for inspection and copying, all documents prepared by or for Vermont Yankee containing its comments regarding, or positions on, the proposed NRC Maintenance Rule (53 FR 47822).
119. Please identify, and provide copies of, all documents which develop, contain or comment on Vermont Yankee's position on Draft Regulatory Guide DG-1001.
120. Please identify, and produce for inspection and copying, all maintenance requests, engineering change requests and all other documents approving and allowing installation of the gasket material involved in the failure of the Reactor Core Isolation Cooling (RCIC) valve operator identified in LER 89-14.
121. Please identify, and produce for inspection and copying, all documents which provide vendor recommendations for gasket material and thickness of the gaskets involved in the failure of the Reactor Core Isolation Cooling (RCIC) valve operator identified in LER 89-14.
122. Please identify, and produce for inspection and copying, all quality assurance and quality control documents which document the inspection, verification, or approval of the gasket material and thickness of the gaskets involved in the failure of the Reactor Core Isolation Cooling (RCIC) valve operator identified in LER 89-14.

By its attorney,


James Volz



Dated: May 7, 1990

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

'90 MAY 10 P4:16

In the Matter of
VERMONT YANKEE NUCLEAR
POWER CORPORATION

(Vermont Yankee Nuclear
Power Station)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH
Docket No. 50-271-OLA-4
(Operating License
Extension)

CERTIFICATE OF SERVICE

I hereby certify that on May 7, 1990, I made service of the within document in accordance with rules of the Commission by mailing a copy thereof postage prepaid to the following:

Administrative Judge
Robert M. Lazo, Chairman
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Administrative Judge
Jerry Harbour
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, DC 20555

Administrative Judge
Frederick J. Shon
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

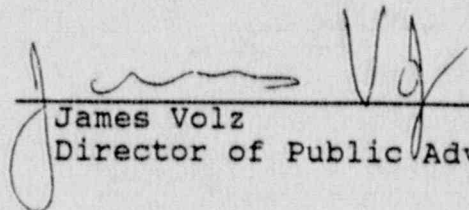
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Board Panel
U.S.N.R.C.
Washington, DC 20555

Dated: 5-7-90


James Volz
Director of Public Advocacy