

RELATED CORRESPONDENCE

4/20/82

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

22 emp

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

APPLICATION OF TEXAS UTILITIES  
GENERATING COMPANY, ET AL. FOR  
AN OPERATING LICENSE FOR  
COMANCHE PEAK STEAM ELECTRIC  
STATION UNITS #1 AND #2  
(CPSES)

Docket Nos. 50-445  
and 50-446



CASE'S TENTH SET OF INTERROGATORIES  
TO APPLICANTS AND REQUESTS TO PRODUCE

Pursuant to 10 CFR 2.740b and 2.741, CASE (Citizens Association for  
Sound Energy), Intervenor herein, hereby files this, its Tenth Set of Inter-  
rogatories to Applicants and Requests to Produce.

Please answer the following interrogatories in the manner set forth  
herewith:

1. Each interrogatory should be answered fully in writing, under oath or affirmation.
2. Each interrogatory response should include all pertinent information known to Applicants, their officers, directors or employees, their agents, advisors or counsel. Employees is to be construed in the broad sense of the word, including specifically Brown and Root, any consultants, and anyone else performing work or services for Applicants.
3. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory; do not combine answers.
4. Each request to produce applies to pertinent documents which are in the possession, custody or control of Applicants, their officers, directors, employees (as defined in 2. above), agents, advisors or counsel.
5. Identify the person providing each answer, response, or document.

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6. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the directives of the Board. Because of the time restrictions under which we are presently operating, we request that supplementation be made on an expedited basis.
7. For each item supplied in response to request for documents, identify it by the specific question number to which it is in response. If the item is excerpted from a document, identify it also by the name of the document. Please also provide the copies in the correct order (rather than in reverse order).

CASE'S INTERROGATORIES TO APPLICANTS AND REQUESTS TO PRODUCE

All of the interrogatories and requests to produce in this set of interrogatories pertain to CASE's Contention 5:

Contention 5: The Applicants' failure to adhere to the quality assurance, quality control provisions required by the construction permits for Comanche Peak, Units 1 and 2, and the requirements of Appendix B of 10 CFR Part 50, and the construction practices employed, specifically in regard to concrete work, mortar blocks, steel, fracture toughness testing, expansion joints, placement of the reactor vessel for Unit 2, welding, inspection and testing, materials used, craft labor qualifications and working conditions (as they may affect QA/QC, and training and organization of QA/QC personnel, have raised substantial questions as to the adequacy of the construction of the facility. As a result, the Commission cannot make the findings required by 10 CFR 50.57(a) necessary for issuance of an operating license for Comanche Peak.

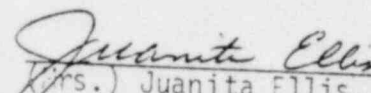
NOTE: In its 10/31/80 rulings, the Board construed Contention 5 to cover the inspection and Enforcement Reports identified by ACORN in its 8/29/80 Offer of Proof in Support of Its Motion for Reconsideration of the QA-QC Contention. These I&E Reports dealt with:

- QA Program - Lack of Compliance
- QA Program - Surveillance
- QA/QC Procedural Deficiencies
- Method of Identification and Control of Nonconformance
- Subcontractors' Failure to Report Items of Noncompliance
- Storage of Electrical Components
- Failure to Follow Pipe Fabrication Procedures
- Potential Construction Deficiency Regarding Possible Damage to Unit 1 Pressurizer
- Failure to Follow Equipment Maintenance Instructions

1. Have any pumps been ordered for the Comanche Peak plant from Hayward Tyler Pump Company of Burlington, Vermont?
2. If the answer to 1. above is yes, supply the following information:
  - a. Were any of the pumps found to be defective?
  - b. What specific tests were run on the pumps to determine whether or not they were defective?
  - c. How many pumps were ordered for Comanche Peak from this company?
  - d. Have any of the pumps been installed?
  - e. Describe the type of pumps and their safety significance in the plant's system.
  - f. Supply for copying and inspection all original documents dealing with all pumps ordered for Comanche Peak from Hayward Tyler Pump Company, including documents dealing with inspections by Applicants and any of its employees as well as by Hayward Tyler Pump Company, NRC reports on the subject of Hayward Tyler pumps, congressional investigations regarding Hayward Tyler pumps, handwritten notes, internal memoranda, and any other pertinent information known to Applicants or their agents or employees.
  - g. If there is any other information regarding Hayward Tyler Pump Company's pumps which were or were suspected of being defective of which Applicants, their agents or employees are aware but which they do not have in their possession, please advise what this information is and where we can obtain it.
3. Supply for inspection and copying the originals of all Nonconformance Reports not specifically requested in our previous interrogatories and requests to produce. (Include both TUGCO and Brown and Root NCR's.)
4. Provide for inspection and copying the originals of each and every Deficiency and Disposition Report (DDR).
5. Provide for inspection and copying the originals of each and every Corrective Action Request (CAR).
6. Provide for inspection and copying the originals of all concrete pour packages. (NOTE: It is expected that this can be narrowed considerably once we have reviewed the documents previously requested.)

7. Provide for inspection and copying the originals of all welding records.  
(NOTE: It is expected that this can be narrowed considerably once we have reviewed the documents previously requested.)
8. Have any audits been performed on Brown and Root by anyone other than Applicants?
9. If the answer to 8. is yes, please provide for inspection and copying the original audits.

Respectfully submitted,

  
Mrs. Juanita Ellis, President  
CASE (Citizens Association for Sound Energy)  
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Dallas, Texas 75224  
214/946-9446  
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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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APPLICATION OF TEXAS UTILITIES  
GENERATING COMPANY, ET AL. FOR AN  
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UNITS #1 AND #2 (CPSES)

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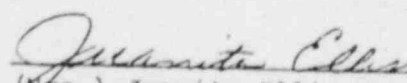
Docket Nos. 50-445  
and 50-446

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies  
of CASE's Tenth Set of Interrogatories to Applicants and Requests to Produce

have been sent to the names listed below this 20th day of April  
1982, by: Express Mail where indicated by \* and by first class mail elsewhere.

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| * Administrative Judge Marshall E. Miller<br>U. S. Nuclear Regulatory Commission<br>Atomic Safety and Licensing Board Panel<br>Washington, D. C. 20555 | David J. Preister, Esq.<br>Assistant Attorney General<br>Environmental Protection Division<br>P. O. Box 12548, Capitol Station<br>Austin, TX 78711 |
| * Dr. Kenneth A. McCollom, Dean<br>Division of Engineering, Architecture,<br>and Technology<br>Oklahoma State University<br>Stillwater, Oklahoma 74074 |  |
| * Dr. Richard Cole, Member<br>Atomic Safety and Licensing Board<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555                      | Atomic Safety and Licensing<br>Board Panel<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555                                       |
| * Nicholas S. Reynolds, Esq.<br>Debevoise & Liberman<br>1200 - 17th St., N. W.<br>Washington, D. C. 20036  | Atomic Safety and Licensing<br>Appeal Panel<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555                                      |
| * Marjorie Ulman Rothschild, Esq.<br>Office of Executive Legal Director<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555              | Docketing and Service Section<br>Office of the Secretary<br>U. S. Nuclear Regulatory Commission<br>Washington, D. C. 20555                         |

  
(Mrs.) Juanita Ellis, President  
CASE (CITIZENS ASSOCIATION FOR SOUND ENERGY)