

4/26/82

REQUEST FOR COMPLETE ANSWERS TO CASE'S 4/5/82 NINTH SET OF INTERROGATORIES TO APPLICANTS AND REQUESTS TO PRODUCE:

Question 41. CASE questions 38, 39, and 40 prefaced Question 41:

- "38. How were audits of design and construction scheduled at the time of the Lobbin Report?
- "39. How were audits of design and construction planned at the time of the Lobbin Report?
- "40. Have you completed your review of your current practices identified in 38 and 39?
- "41. What changes, if any resulted from this review?"

Answer: "Both of the procedures identified in the responses to Interrogatories 38 and 39 have been revised." Your answers to 38 and 39 only refer to sections of the Corporate Quality Procedures/Instructions Manual. This does not answer CASE's specific question as to what specific changes resulted from this review.

Question 75. "Identify audits in which 'TUGCO QA has in fact made determinations of generic effect as a result of audit findings.' (Lobbin Report, Applicants' Response, page 15)"

Answer: "As stated in the Lobbin Report (p. 15), determination of generic effect is made on every audit as a result of audit findings. Specifically, an auditor, upon finding a deficiency, must determine, by further review and investigation, whether the deficiency is an isolated incident or whether there are additional instances of the same type of problem. In addition, the auditor determines whether the problem is the result of a program or procedure deficiency, inadequate training, or attitude. Although there is no requirement to, and the applicant does not record this logic sequence, this evaluation is in fact performed on every audit performed by the Applicant."

While the preceding is very informative as to how the process works, it does not answer CASE's specific question. We want to know which particular audits TUGCO QA has determined to have findings which indicate generic effect.

Question 77. CASE Question 77 was prefaced by Question 76:

"76. With reference to 75, was the determination made that the generic effect applied to past activities?"

Answer: "Yes."

"77. With reference to 76, if the answer is yes, what remedial measures were taken to assess and correct the effects? Answer for each audit."

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Question 77 (continued):

Answer: "Together with the audit reports, all corrective and preventive action responses, if required, have been made available to CASE for inspection and copying with each audit report produced."

This answer is completely meaningless to us, since Applicants have not answered our previous question. We have been supplied with many audit reports in answer to our requests to produce, and we have no way of knowing which specific reports Applicants are referring to.

Question 99: "Has there ever been a trending program for nonconformance reports at CPSES?"

Answer: "There are programs in place at Comanche Peak which require that non-conformances be reviewed in an effort to preclude repetition of conditions adverse to quality."

Does this mean "yes"?

Question 100: "If the answer to 99 is yes, who conducted the program?"

Answer: "Both Brown & Root and TUGCO quality assurance organizations implement a program as described in the response to Interrogatory 99."

This answer is meaningless to us, since we don't know what Applicants' answer to Question 99 means. Please answer this question at the same time you answer Question 99.

Question 154. "With reference to 152 (regarding reporting of items listed as being possibly reportable on the NCR Logs), who makes the determination as to whether or not each item was actually reported."

Answer: "This responsibility is defined in site quality procedure CP-QP-16.1 (TUGCO 'Quality Procedures Manual') and procedure CQP-CS-6 (Corporate Quality Procedures/Instructions Manual), which have been made available to CASE for inspection and copying."

This answer is not responsive to our question, which asks who makes the determination, not the title or responsibility of such person. We want the name of the person who makes such determination.

(Further, as Applicants are well aware, we have always given Applicants a signed certification of each document we have viewed and had the opportunity to copy. Applicants should also be aware, from reviewing the list of the documents we have copies of, that we do not have a copy of CP-QP-16.1.)

Question 157. "With reference to 156 (regarding the determination to void an item on the NCR log), who makes such determination?"

Question 157 (continued):

Answer: "See response to Interrogatory 156."

Answer to 156: "Procedure CP-QP-16.0, Paragraph 3.1.5.1 (TUGCO 'Quality Procedures Manual') and procedure CP-QAP-16.1, Paragraph 3.2.1.3 (Corporate Quality Procedures/Instructions Manual) define the processes of voiding NCR's. These procedures have been made available to CASE for inspection and copying."

Questions 156 and 157 were not the same. Question 156 asked for an explanation of the criteria used in determining whether or not to void an item. Question 157 asked who makes such determination? As with Question 154, we want the name of the person who makes such determination.

(See also comments under Question 154 regarding the procedures CASE does and does not have. We do not have copies of CP-QP-16.0 or CP-QAP-16.1. It appears we will have to obtain copies of the entire manuals in order to get answers to our interrogatories.)