

RELATED CORRESPONDENCE

DOCKETED
5/7/82

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION '82 MAY 11 10:55

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD *emp*

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 ELEVENTH 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 Eleventh Set of Interrogatories 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 document provided should include a sworn statement of its authenticity.
3. 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.
4. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.
5. 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.
6. Identify the person providing each answer, response, or document.
7. 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.

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8. 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 the following, and your answers should include these subjects:

- 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. Provide a sworn statement or affidavit that the copies of documents which CASE has received are true and correct copies. We realize that we have received many documents and will work with Applicants to arrive at a satisfactory agreement in this regard. What we want to avoid is any problem with being able to introduce into evidence any of the documents with which Applicants have provided us. (We understand that Applicants may still object on other grounds, but we don't want to have to contend with haggling during the hearings as to whether or not the documents we have been supplied are true and correct copies.)
2. Some of the logs with which we have been supplied show trending category numbers. For each of the following logs, please explain how this trending number is used (i.e., is it fed into a computer, etc.), how it is determined which category is used if there is more than one possible category, whether or not any cross-referencing is done if there is more than one possible category, what purpose such trending is used for, and any other pertinent information regarding such trending:
 - (a) NCR (Nonconformance Report), for Brown & Root and for TUGCO;
 - (b) DDR (Deficiency and Disposition Report); and
 - (c) CAR (Corrective Action Report).
3. Provide for inspection and copying all documents regarding trending concerning the following. If this is a computer print-out, provide an explanation of what each heading and each item means (i.e., put it in language that a reasonably intelligent person who is not familiar with computer language can understand). Provide what each abbreviation stands for and means. Include the most current information available.

We will definitely want a copy of all such trending done, so you might want to go ahead and start copying it. We will accept copies (rather than looking at original documents) with proper authentication that such copies are true and correct:

- (a) NCR's (Nonconformance Reports) - Brown & Root;
- (b) NCR's (Nonconformance Reports) - TUGCO;
- (c) DDR's (Deficiency and Disposition Reports); and
- (d) CAR's (Corrective Action Reports).

VOID - see pg. 30

4. Please explain with reasonable specificity what the difference is between the Brown & Root NCR's, TUGCO NCR's, DDR's, and CAR's. Include in your answer what the purpose of each type of report is, the steps involved in going from report to report (i.e., it appears that on some Brown & Root NCR's, there are also CAR's made up after the NCR has been written and analyzed); and any other pertinent information in this regard.

5. All of the copies we have been provided of the Nonconformance Reports (NCR's) and some of the other documents provided have been stamped in red "For Information Only." This was not on the original documents which we inspected and requested copies of. Please advise the purpose of this marking.

6. In Applicants' 4/20/82 Answers to CASE's Ninth Set, Question 143, Applicants provided in Attachment 4, on pages 2 and 3, the Brown & Root NCR Trend Categories for G1 through G12, M1 through M13, and M14 through M23. In reviewing the NCR's which we recently obtained, we find that there are many categories which have not been identified in Applicants' 4/29/82 Answer. Specifically, there are no listings for the C's.

Please provide a complete trending category breakdown. Since this information was requested in our Ninth Set, please give us a call at once and provide this information verbally, then confirm in writing.

7. For each of the NCR Trend Categories, please advise what each abbreviation stands for and provide a brief explanation of what each trend category includes and means. (For example, M16A is shown as "WPS Violation." Please advise what the initials "WPS" stand for, as well as what specific kinds of violations are included in this Trend Category.) Some of these are fairly self-evident, and we are not asking for a great amount of detail; we simply want to be certain we understand what each Trend Category means and the type of items which are covered by it.

C-1 -

C-2 -

C-3 -

C-4 -

C-5 -

C-6 -

7. (continued):

C-7 -

C-8 -

C-9 -

C-10 -

C-11 -

C-____ - (any other C's) -

G1 - Shipping Damage -

G2 - Incomplete Documentation -

G3 - Noncompliance with Specifications (including configuration during receiving/procedures) -

G4 - Handling/Storage -

G5 - Cleanliness -

G6 - Calibration -

G7 - Coatings/Painting -

G8 - Installation Construction Damage -

G9 - Improper Material -

G10 - Storage Maintenance -

7. (continued):

G11 - Installed Maintenance -

G12 - Dwg/CMC Incorrect -

M1 - Equipment Installation -

M2 - Equipment Alignment -

M3 - Piping Fabrication -

M4 - Piping Installation -

M5 - Welding -

M6 - Nondestructive Examination Results -

M7 - Heat Treatment -

M8 - Hydrostatic Testing -

M9 - Equipment Malfunction -

M10 - Inspection/Surveillance -

M11 - Minimum Wall -

M12 - Violation of Holdpoints -

M13 - Material -

M14 - Support Fabrication -

7. (continued):

M15 - Support Installation -

M16A - WPS Violation -

M16B - Unqual. Welder -

M17 - RDE -

M18 - Heat Treatment -

M19 - Material -

M20 - Holdpoint Violation -

M21 - Dwg/CMC Incorrect -

M22 - Documentation Incomplete/Incorrect -

M23 - Specification Violation -

8. Please provide for each of the headings on the DDR Log what each abbreviated item stands for, what each heading means, how the determination is made as to whether a yes or a no is shown in the last column "Ref. Def. Yes/No.," and the name, title, and company affiliation of the person who made such determination; also indicate whether or not such person is still employed on the project and in what capacity.
9. Please provide a breakdown of what each item in the Dispo. Cat. column of the Brown & Root DDR Log stands for, what each abbreviation stands for, and provide a brief explanation of what each item includes and means (similar to the information requested in Question 7 preceding).
9. On the DDR logs we have been provided, pages 1 through 16 show "Civil" as the Discipline, while pages 17 through 30 show "All" as the Discipline. Regarding this, please provide the following information:
 - (a) Please list all the disciplines encompassed by "All."
 - (b) If only the "Civil" discipline was shown on pages 1 through 16, how were the other disciplines encompassed in "All" accounted for? If they weren't kept on the DDR logs, where were they kept?

9. (continued):

- (c) Please provide for inspection and copying the logs of the other than Civil discipline items referenced in (b) preceding. We will definitely want copies of all such logs, so you might want to go ahead and start copying them. We will accept copies (rather than looking at original documents) with proper authentication that such copies are true and correct.
- (d) Please provide for inspection and copying all items listed on the logs referenced in (c) preceding, or if not listed on logs, the original items regarding all other than Civil disciplines referenced in (b) preceding. We will accept copies (rather than looking at original documents) with proper authentication that such copies are true and correct. However, without seeing the documents first, we don't know exactly which ones we will want copies of.

10. Some of the items listed on the TUGCO NCR Log do not have a Trend Cat. listed, and on some we are not sure from our copy of the Log what the Trend Cat. number is. Please advise the Trend Cat. number for the following (we are listing them by the last number only - for example, M-81-00066 is shown as 66; we believe this will be sufficient identification):

Not sure what number is:

76
90
106
130
142
147
164
199
246
350
361
365
399
449
450
573
666
865
1226
1462

Number not shown:

66	1400	1518
538	1433 and 1434	1520
1319	1454	1522
1349	1460	1525 through 1534
1360	1475	1536
1369	1503	1554
1370 through 1373	1513	1572
1396	1515	1575
1399	1517	1577

10. (continued):

Number not shown (continued):

1580 and 1581
1591
1597 and 1598
1605
1607
1609
1614
1622 through 1632
1634 and 1635
1637 through 1655
1658
1660 and 1661
1664 through 1667
1669 through 1671
1673
1680
1686
1700
1702 through 1704
1706
1709
1717 and 1718
1783
1795 through 1801
1805
1823
1826
1828

(NOTE: All of the preceding are 1981 numbers)

Number not shown (the following are 1982 numbers):

2 through 17	211 through 218
19 through 26	220 through 222
28 through 30	224 and 225
32 through 37	228
39 through 48	230 through 239
50 through 94	241 through 278
96 through 112	280 through 291
115 through 120	293 through 297
122 through 125	300 through 307
127	309 through 334
129	335 through 338
131 through 145	340 through 351
148 through 158	353 through 360
160 through 175	362 through 372
177 through 179	374 through 382
181 through 186	387 through 424
188 through 209	426 through 437

11. Please provide for each of the headings on the TUGCO NCR Log (both the original format and the changed format which started with item M-81-01537) what each abbreviated item stands for, and what each heading means.
12. Many of the items listed on the TUGCO NCR logs (especially for 1982) do not have the number filled in for the Trend Category. Please explain briefly how the trending for these logs is done (when it is done; is it done from the NCR log or from the NCR itself; how often is it done; etc.).
12. With further reference to Question 11, have the items which are listed in Question 10 which do not have a Trend Category number been included in the trending provided in response to our Question 3?
13. Please provide for each of the headings on the Brown & Root Corrective Action Request (CAR) log what each abbreviated item stands for and what each heading means.
14. If any trending has been done of the Brown & Root Corrective Action Requests (CAR's), please explain how the trends are coded and provide a breakdown of what each trend category item is and what it means. Provide what each abbreviation stands for and means.
15. There are no items listed on the Brown & Root Corrective Action Requests (CAR) logs for 1981. However, we were also provided with a copy of a "Corrective Action Request (CAR) Log" in response to our Sixth Set of Interrogatories and Requests to Produce (Question 7e) which showed items 001 through 005, for the dates 8/14/81 through 8/24/81. Please explain the difference between this log and the Brown & Root CAR logs referenced in our preceding questions. Also please explain why there were no items on the Brown & Root CAR logs for 1981 and whether or not the other CAR log referenced in this question is part of the Brown & Root CAR log for 1981. Where are the other CAR's for 1981 listed?
16. Please provide for inspection and copying all other logs for 1981 identified in response to Question 15. We will definitely want copies, so you might want to go ahead and start copying them. We will accept copies (rather than looking at original documents) with proper authentication that such copies are true and correct. (And please include copies of all items listed on the other CAR logs referenced in 15 preceding and all CAR items for 1981, regardless of where they are shown on the logs or if they are shown on the logs in your response to CASE's 4/20/82 Tenth Set to Applicants, Question 5.)
17. We have been provided with Brown & Root Deficiency (DR) Logs; however, these logs are numbered from DR No. 1 through 353 and are dated from 4/22/77 through 7/16/79. Are there other Brown & Root (or TUGCO or other Applicants) Deficiency (DR) Logs, either prior to or after the 4/22/77 - 7/16/79 period?
18. If the answer to 17 is yes, please provide the following information:
 - (a) Identify the other logs by name of company (Brown & Root, TUGCO, etc.).
 - (b) Has there been any sort of trending done regarding the DR logs or the DR's?

18. (continued):

- (c) If the answer to (b) is yes, please explain how the trends are coded and provide a breakdown of what each trend category item is and what it means. Provide what each abbreviation stands for and means.
 - (d) Provide for inspection and copying all logs referenced in 17. preceding. We will definitely want copies. so you might want to go ahead and start copying them. We will accept copies (rather than looking at original documents) with proper authentication that such copies are true and correct.
 - (e) Provide for inspection and copying all DR's listed on the logs referenced in (d) above. You may provide either originals or authenticated copies.
19. Please provide for each of the headings on the Brown & Root Deficiency Log what each abbreviated item stands for, and what each heading means.
20. One of the headings on the Deficiency Log is "Deficiency Trend Cat." The items listed in this column are Roman numerals. Please explain what these Roman numerals are and what they represent (and specifically, advise whether or not they correspond to the Roman numerals set forth in 10 CFR Part 50, Appendix B), what each Roman numeral title is.
21. Please explain briefly how the trending is done regarding the Deficiency Logs and/or DR's (when it is done; how often it is done; is it done from the Deficiency Logs or from the DR's themselves; etc.).
22. Please provide for inspection and copying all documents regarding trending of the Deficiency Logs and/or DR's. If this is a computer print-out, provide an explanation of what each heading and each item means (i.e., put it in language that a reasonably intelligent person who is not familiar with computer language can understand). Provide what each abbreviation stands for and means. Please include the most current information available.

We will definitely want a copy of all such trending done, so you might want to go ahead and start copying it. We will accept copies (rather than looking at original documents) with proper authentication that such copies are true and correct.

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23. What is the difference between the DR's, the NCR's, the DDR's, and CAR's. (Other than what has already been explained in your answer to Question 4.) Specifically, how do the DR's differ from the others? Include the DR's in your answer to Question 4 insofar as the following is concerned: "Include in your answer what the purpose of each type of report is, the steps involved in going from report to report", etc.
24. In our Tenth Set, Questions 3, 4, and 5, we requested that you provide for inspection and copying the originals of each and every Deficiency and Disposition Report (DDR), Corrective Action Request (CAR), and Nonconformance Reports (both TUGCO and Brown and Root NCR's). We will now accept properly certified copies for inspection if you would prefer. Please contact us about this and we will work up a list of the specific items we will want to inspect, as we did for the NCR's we have inspected at the plant site recently.

24. (continued):

Our acceptance of authenticated copies is based on the understanding that Applicants will supply such copies in a timely fashion.

25. Has there been any other trending done other than for the specific items we have already requested?

26. If the answer to 25 is yes, please supply the following:

(a) A brief explanation of what such trending consists of.

(b) Supply for copying and inspection all documents regarding such trending. If this is a computer print-out, provide an explanation of what each heading and each item means. For all trending requested in this item and elsewhere in this pleading, provide sufficient explanation and put your answer in language that a reasonably intelligent person can understand. Provide what each abbreviation stands for and means. Please include the most current information available.

We will definitely want a copy of all such trending done, so you might want to go ahead and start copying it. We will accept copies (rather than looking at original documents) with proper authentication that such copies are true and correct.

For all trending requested in this pleading, if any of the information is on odd-sized paper, provide copies on the same sized paper as the original, rather than providing reduced copies.

27. Provide for inspection and copying all items listed on the Brown & Root Deficiency Logs (DR's). We will accept copies (rather than looking at original documents) with proper authentication that such copies are true and correct. However, without seeing the documents first, we don't know exactly which ones we will want copies of. (We can probably cut this request down to specific items but we have not yet had the time to do so. Therefore, we are at this time requesting inspection and copying of all items, since this is our last opportunity to request documents under our present schedule. This, incidentally, was also the reason we requested inspection and copying of all the Nonconformance Reports, Deficiency and Disposition Reports, and Corrective Action Requests in our Tenth Set to Applicants. Under the then-current schedule, 4/20/82 was the last day we would have been able to file interrogatories and requests for documents prior to the 4/22/82 cut-off date due to the fact that the writer had to work 4/21/82 and left immediately after work that day for Glen Rose, where we inspected documents the next day, 4/22/82. We still were not positive exactly which DDR's, CAR's and NCR's we wanted copies of and were unable to narrow our request further at that time.)

28. With further reference to 24 preceding, we will definitely want authenticated copies of all Corrective Action Requests (CAR's), including those referenced in questions 15 and 16 preceding, so you might want to go ahead and start copying them.

29. On the CAR logs, what does 16.1 mean in the column QA File No.?
 30. For all of the logs which we have received, and the reports listed on those logs, please explain the relationship between them, the general purpose of each of them, the differences between the various logs and types of reports, and the steps involved in going from report to report (i.e., it appears that on some Brown & Root NCR's, sometimes CAR's are written up after the NCR has been written and analyzed). Include in your answer how it is determined what the proper log and/or report is (i.e., whether a Brown & Root NCR is written up as opposed to a TUGCO NCR being written up).
- Answer specifically for each of the following: Brown & Root NCR's, TUGCO NCR's, DDR's, DR's, CAR's, DCA's, DECD's, etc.
31. Please provide for each of the headings on the DECD Master Log what each abbreviated item stands for, what each heading means.
 32. Some numbers in the DECD No. column have been skipped. Please explain why.
 33. On some of the items in the Date Received column on the DECD Master Log, there is more than one date, and on some of the items there are also other numbers. Please explain what these dates and other numbers are.
 34. On the DECD Master Log, please provide the name, title, and company affiliation of each of the people whose initials are shown in the Action Assigned To column.
 35. What do the numbers in the Subject column on the DECD Master Log refer to? There are several different kinds of numbers shown. We don't want an explanation of each and every specific item, but please answer at least regarding each type of number.
 36. In the DCA No. column on the DECD Master Log, what do the numbers which begin with CMC- and CPPA- refer to, and where are those items to be found?
 37. The DECD Master Logs with which CASE has been supplied begin with S-2240, date received 5/20/80, and end with S-2594, date received 1/22/82. Then another section starts up with S-10,001, date received/GTN No. 6/3/80, and ends with 12,412R1, Date Received/GTN No. 5-23-80 47073.

Please provide for inspection and copying all DECD Master Logs prior to and after 5/20/80 and 1/22/82. We will definitely want copies of all of these logs, so you might want to go ahead and copy them. We will accept properly authenticated copies.

38. If there are no other DECD Master Logs as referenced in 37 preceding, how were the records kept on the items shown on the DECD Master Logs during that time frame?
39. Provide for inspection and copying all items listed on the DECD Master Logs. You may provide either authenticated copies or originals. We do not at this time know which items we may want copies of.

40. Please provide for each of the headings on the DCA logs what each abbreviated item stands for and what each heading means.
41. On the DCA logs, please provide the name, title, and company affiliation of each of the people whose initials are shown in the Orig. column.
42. On the DCA logs, there are several types of numbers listed under the Description column. For each type of number, please advise what the number refers to and where the item to which the number refers can be found.
43. The word "Procurement" appears in several places on the DCA logs in the DECD No. column. Please explain the meaning of this term.
44. The DCA logs with which we have been supplied begin with DCA No. 8294 dated 8/21/80 and ends with DCA No. 12,257 dated 1/27/82.

Please provide for inspection and copying all DCA logs prior to 8/21/80 and after 1/27/82. We will definitely want copies of all of these logs, so you might want to go ahead and copy them. We will accept properly authenticated copies.

45. If there are no other DCA logs as referenced in 44 preceding, how were the records kept on the items shown on the DCA logs during that time frame?
46. Provide for inspection and copying all items listed on the DCA logs. You may provide either authenticated copies or originals. We do not at this time know which items we may want copies of, but anticipate that it will be very few. (See comment in question 27 preceding.)
47. Please provide for each of the headings on the Site Log for GH/NY Generated DCRP what each abbreviated item stands for and what each heading means.
48. Regarding the Site Log for GH/NY Generated DCRP, provide the following information:
 - (a) Provide the name, title, and company affiliation of each of the names or initials which are shown in the Forwarded to Proj. Disc. Eng. Date column.
 - (b) Some of the items under the Reviewed DCRP Recd. Date column are blank; others have dates in them. Please explain the meaning of these dates and why some items have dates and some are blank.
 - (c) Some of the items under the DCRP Transmitted to G&H/NY column have dates; others have letters-numbers. Please explain the meaning of the dates and the letters-numbers and why some items have dates and some have letters-numbers.
 - (d) Some of the items under the Design Change Recd. from GH/NY for DCRP column have letter-numbers and some are blank. Please explain the meaning of these letter-numbers and why some items have letter-numbers and some are blank.

48. (continued):

- (e) In the Remarks column, the following remarks are shown: Approved; Rejected; More info. needed; (blank); DCR should be revised; Rescinded per GTT-4820.

Who (name, title, and company affiliation) makes such approval or rejection?

- (f) With further reference to (e) above, with regard to DCRP #106, was more information supplied; and what is the current status of this item?
- (g) With further reference to (e) above, what is the current status of item 97 (shown as blank in the last three columns)?
- (h) With further reference to (e) above, DCRP #75, was the DCR revised; and what is the current status of this item?
- (i) With further reference to (e) above, DCRP #42, what is GTT-4820 and where can it be found?
- (j) What is the current status of DCRP #43?
- (k) What is the current status of DCRP #97?
- (l) What is the current status of DCRP #110?
- (m) What is the current status of DCRP #114?
- (n) The Site Log for GH/NY Generated DCRP with which CASE has been supplied begin with DCRP 37 received 2/1/80 and end with DCRP #114 received 1/12/82.

Please provide for inspection and copying all Site Logs for GH/NY Generated DCRP prior to 2/1/80 and after 1/12/82. We will definitely want copies of all of these logs, so you might want to go ahead and copy them. We will accept properly authenticated copies.

- (o) If there are no other Site Logs for GH/NY Generated DCRP as referenced in (m) preceding, how were the records kept on the items shown on the Site Log for GH/NY Generated DCRP during that time frame?
- (p) Provide for inspection and copying all items listed on the Site Logs for GH/NY Generated DCRP. You may provide either authenticated copies or originals. We do not at this time know which items we may want copies of.
- (q) Under the DCRP # column, some of the items are preceded by a T and some of them appear to be preceded by a T which has been marked out. Please advise the meaning of these.

49. Provide a listing of all items reported to the NRC under 10 CFR 50.55(e). Include for each the numbers of all CAR's, DR's, DECD's, DCA's, DCRP's, NCR's, DDR's, I&E Reports, etc. which relate to each item reported.
50. Provide for inspection and copying all documents referenced in your answer to 49 preceding.

51. Provide for inspection and copying all concrete pour records, welding records, and other records applicable to the items referenced in your answer to 49. preceding. Please identify each one according to your answer in 49.

For 50. and 51. preceding, you may provide originals or authenticated copies for copying and inspection. However, at this time we are not certain exactly which ones we will want copies of.

52. Please refer to TGH Audit 15, the 10/16/80 office memo to D. N. Chapman from R. A. Jones, TUGCO, QXX657 under subject of As-Built Drawings.

(a) Has the as-built program been developed?

(b) Has the as-built program been implemented?

(c) Has the as-built program been reviewed?

(d) Has the as-built program been verified?

(e) Has the as-built program been developed, implemented, reviewed, and verified in accordance with the suggestions in Mr. Jones' 10/16/80 memo?

(f) If the answer to any of the above questions is no, please give specifics, and advise the current status of the program and its projected completion date, and details as to why this has not been done in accordance with Mr. Jones' suggestions (if this is the case).

(g) Supply for inspection and copying all documents which relate to the as-built drawings program, its development, implementation, review, verification, and projected completion. Include all documents in the broadest sense of the word, including internal memoranda, handwritten notes, etc.

(h) Provide a few samples of the as-built drawings, and advise the method by which these will be worked into the as-built drawings system.

53. Provide for inspection and copying blank copies of all forms referenced in the NCR's (i.e., WCM, WDC, CSTP, MRS, DCA, CMC, etc.).

We will definitely want copies of all of these, and if you don't have blank copies readily available, you might want to go ahead and make copies of these.

54. Provide for inspection and copying a blank copy of each form letter used during dispositioning of NCR's (i.e., Gibbs and Hill acceptance letter for "use as is;" W acceptance letter, and any other form letters used in dispositioning process).

We will definitely want copies of all of these, and if you don't have blank copies readily available, you might want to go ahead and make copies of these.

55. Please identify "GSB" whose initials appear on the NCR provided hereto as CASE Attachment A, item (27) ANI Verification. Please provide the following information regarding this individual:

56. Please provide blank copies of all revisions of NCR form BR114 and advise for each the dates during which it was used at CPSES.
57. Please advise the rationale used in decisions to issue Corrective Action Requests (CAR's).
58. Provide for inspection and copying all documents (in the broadest sense of the word, including internal memoranda, handwritten notes, etc.) regarding procedures, suggested procedures, changes in procedures, etc., for the use of CAR's.

We will definitely want copies of all of these, and you might want to go ahead and start copying them. We will accept authenticated copies.

59. Provide a list of all Quality Control inspectors at CPSES. For all such inspectors, provide the discipline with which they were involved and their dates of employment at CPSES.
60. For the inspectors identified in response to 59. preceding, provide the signature sheet (or whatever document is used for signatures and initials of the inspectors) for inspection and copying.

We will definitely want a copy of this document and will accept an authenticated copy. (Please be sure all signatures and initials are legible on any copy supplied.)

61. Provide the process, if any, by which decisions are made on whether or not and when a report is to be made to the NRC pursuant to 10 CFR 50.55(e).
62. How has the process referenced in 61. preceding differed to date? Specify for each period of time who made the first determination that an item was possibly reportable and trace the process through to the final decision on whether or not to report the item. While we do not expect the specific name of each and every person who made such determinations, please be reasonably specific (i.e., you might answer: "The initial decision was made by the person whose name appears on the NCR in item (9) Disposition Assigned to space." or whatever is applicable.). If there are only a few people who ultimately make the decision at any step in the process, provide for each of them: their name, title, and company affiliation. At each step in the process, include in your answer the company and title of the people making the decisions.
63. Please refer to your answer to Question 137 of CASE's Ninth Set to Applicants. Please provide the company affiliation of the Quality Assurance personnel at CPSES referenced in your answer.
64. Where is the decision not to report an item under 10 CFR 50.55(e) recorded?
65. If the document reference in your answer to 64. is on some sort of summary sheet or log or is in some sort of relatively easily retrievable form, please supply it for inspection and copying. We will definitely want a copy of this document and will accept an authenticated copy.

66. (a) Please identify the document which sets forth the criteria for writing a TWR (as shown on some of the NCR logs).
- (b) Provide for inspection and copying the document identified in your answer to (a) above. We will definitely want a copy of this document and will accept an authenticated copy.
- (c) Does the absence of a TWR mean no further work was done until an acceptable disposition was approved? If not, please explain what the absence of a TWR means.
67. Have Applicants ever made any reports to the NRC pursuant to 10 CFR 21?
68. If the answer to 67. preceding is yes, please supply the following information regarding each such report:
- (a) Date.
- (b) Subject.
- (c) Who reported it? Include the name, title, and company affiliation of each person involved in the reporting process from the time it was first reported to Applicants through the time it was finally reported to the NRC.
- (d) To whom reported. Include the name and title of the person within the NRC to whom it was reported.
- (e) Supply for inspection and copying all documents relating to such report. We will definitely want copies of all such documents, and will accept authenticated copies.
69. By your answer to Question 155 of CASE's Ninth Set to Applicants, do you mean that after October 1981 no waivers to continue work were granted?
70. With reference to 69. preceding, did this mean that no work could be done until an acceptable disposition was approved?
71. For NCR's which have been typed up, are original handwritten NCR's still kept?
72. If the answer to 71. is yes, please supply them for inspection and copying.
73. During the week of April 19, was there a reportable deficiency found?
74. If the answer to 73. preceding is yes, please supply the following information:
- (a) Date deficiency found.
- (b) Description of deficiency.
- (c) Date deficiency reported to NRC.

74. (continued):

- (d) What systems of Applicants, prime contractors, subcontractors, and/or vendors should have but did not detect this deficiency?
- (e) What remedial actions to prevent recurrence of deficiency are under consideration?
- (f) What remedial actions to assure detection of such deficiencies are under consideration?
- (g) Was this reportable deficiency to be written up (or has it been written up) as NCR M3504?
- (h) Provide for inspection and copying all documents (in the broadest sense of the word, including internal memoranda, handwritten notes, etc.) regarding this deficiency. We will definitely want copies of all such documents and will accept authenticated copies. Please be sure that all handwritten information is clearly legible on such copies.

75. The format for some of the Brown & Root NCR's differs from others (see CASE Attachments A & B for samples).

For Attachment A, provide the following information:

- (a) Advise what each of the headings (from "Plant Code" through "Input Date") stands for (if abbreviated) and means.
- (b) Provide a listing of all the possible "Plant Code" variations and a brief explanation of the meaning of each.
- (c) Provide a listing of all the possible "System Code" variations and a brief explanation of the meaning of each.
- (d) Provide a listing of all the possible "Component Code" variations and a brief explanation of the meaning of each.
- (e) Provide a listing of all the possible "Vendor Code" variations and a brief explanation of the meaning of each.
- (f) Advise what each of items (3) "Reported By" through (31) "Remarks" stands for (if abbreviated) and means. Explain briefly how each is used and its purpose.
- (g) On the sample used for Attachment A, please supply the name of the persons who signed or initialed items (7), (14), (16), (20), (25), and (29). Provide for each his company affiliation, title, and a brief job description.
- (h) What does N/A in Items (18), (22), and (27) stand for and mean? For each item, explain why a signature was not required for that item.
- (i) Explain the use of the rubber stamped information contained in item (31) Remarks (i.e., QA Record information which has been rubber stamped and filled in by hand). Advise what each item shown on the rubber stamp stands for (if abbreviated) and means and explain how each is used.

75. (continued):

- (j) Is the information in item (11) Corrective Action Request (Required/Not Required) filled out by the person shown in item (3), (4), (7), (9), (14), (16), (18), (20), (22), (25), (27), or (29)? (Specify which.)
- (k) Does the same person referenced in your answer to (j) preceding also fill out the information in item (12) Reportable Deficiency (Possible/No)? If not, who does?
- (l) Please advise the reason for the difference in formats for Attachments A and B.
- (m) Please advise what has to be done before signing or initialling and dating for each of the following items (i.e., is all the paperwork reviewed; is there an actual inspection made of the nonconforming condition and its repair, if repairs have been made; what determination must be made before a date is put in the item space and it is signed or initialled?):
 - (1) Item (3) Reported By: and Item (4) Date:
 - (2) Item (5) Prepared By: and Item (6) Date:
 - (3) Item (7) Review/Approval: and Item (8) Date:
 - (4) Item (9) Disposition Assigned to: and Item (10) Due Date:
 - (5) Item (14) Constr. Review/Approval: and Item (15) Date:
 - (6) Item (16) QA Review/Approval and Item (17) Date:
 - (7) Item (18) Client Review/Approval: and Item (19) Date:
 - (8) Item (20) Eng. Review/Approval and Item (21) Date:
 - (9) Item (22) ANI Review/Approval: and Item (23) Date:
 - (10) Item (25) QA/QC Engr./Insp. Verification: and Item (26) Date:
 - (11) Item (27) ANI Verification: and (28) Date:
 - (12) Item (29) QA Review/Closure and Item (30) Date:
- (n) Who makes the determination as to what is checked in item (24) Verification: (Satisfactory/Unsatisfactory/Not Req'd.)? (i.e., the person whose signature appears in item _____.)

76. For the amount of NCR's reported, there seem to be very few CAR's. Why weren't there more CAR's requested?

77. With reference to the CMC (Component Modification Card) logs, please supply the following information:

77. (continued):

- (a) Please provide a brief description of what the CMC's are and what their purpose is.
- (b) Are all items shown in the "Document/Drawing number" column of the CMC logs a drawing? If not, please explain what they are.
- (c) Please explain the meaning of the column heading "Eng. Init."
- (d) Please explain what "DCC" stands for and what it means.
- (e) Please explain the meaning of the column heading "Date to DCC."
- (f) Please explain the meaning of the the numbers such as M1-715 shown under the "Description of Change" column.
- (g) Please explain the meaning of the terms such as Red. 7-1 which appear under the "Description of Change" column.
- (h) Please explain the meaning of the terms such as R1, R2, etc. shown under the "Comments" column.
- (i) Many of the sheets have letter-numbers on the bottom of the sheets (such as D4, K8, etc.). Please explain the meaning of such letter-numbers.

- 78. For the TUGCO persons qualified to participate as auditors in the vendor QA audit program, as listed in your answer to Question 44 of our Ninth Set to Applicants, please provide the title of each and advise who's in charge.
- 79. Please advise how many site construction audits have been performed by the National Board of Boiler and Pressure Vessel Inspectors and the date of each. (If there have been no more than the two in 1979, please so state.)
- 80. Provide for inspection and copying all such audits referenced in 79. preceding. We will definitely want copies of all such audits and will accept authenticated copies.
- 81. Please advise the rationale for not advising CASE of the existence of the audits referenced in 79. preceding prior to your answer to our Question 52 of our Ninth Set to Applicants.
- 82. Please advise whether or not the audits referenced in your answer to our Question 53 in CASE's Ninth Set to Applicants are the same audits which have been already (or will be in response to 80. above) been provided to CASE. If not, please provide for inspection and copying all such audits which we have not yet received. We will definitely want copies of all such audits and will accept authenticated copies.
- 83. Your answer to our Question 56 of our Ninth Set to Applicants indicated that you have not yet complete the evaluation of TUGCO's "level of audit activity against industry standards." Has this evaluation now been completed?

84. If the answer to 83. preceding is no, please advise the status of such evaluation and when it is expected to be completed.
85. Provide for inspection and copying all documents (in the broadest sense, including internal memoranda, handwritten notes, etc., and the completed or partially completed or draft of the evaluation) pertaining to the evaluation referenced in 83 preceding. Please also provide the completed evaluation as soon as it becomes available.

We will definitely want copies of all such documents, and we will accept authenticated copies.

86. Your answer to Question 72 of CASE's Ninth Set to Applicants states that "other audits may include a review of nonconformance records as they may apply to the activity being audited."

Would all such audits be TCP audits?

87. Supply for inspection and copying all documents (in the broadest sense of the word, including handwritten memoranda, internal memoranda, handwritten notes, telephone messages, etc.) between Applicants and F. B. Lobbin regarding the Lobbin Report and anything leading up to or connected with it.

We will definitely want copies of all such documents, and we will accept authenticated copies. Please be sure that any handwritten documents are clearly legible.

88. In your answer to Question 127 of CASE's Ninth Set to Applicants, you stated "In addition, site surveillance reports were issued in prior years pursuant to surveillance activities performed by Brown & Root."

Please list all such Site Surveillance Reports by year.

89. Provide for inspection and copying all such Site Surveillance Reports listed in 88. preceding.
90. In your answer to Question 136. of CASE's Ninth Set to Applicants, does this mean that there was no vendor compliance program prior to August 1978 at CPSES?

91. Please refer to your answer to Question 152 of CASE's Ninth Set to Applicants. For each of the following NCR's which were not reported, provide the following information: name of the person who made the final decision as to whether or not to report it, his title and company affiliation:

NCR 669	NCR 811
NCR 704	NCR 815
NCR 722	NCR 831
NCR 806	NCR 833
NCR 809	NCR 894
NCR 810	NCR 899
	NCR 906
	NCR 907

92. With further reference to 91. preceding, for each of the following NCR's which were reported, provide the following information: name of the person who made the final decision as to whether or not to report it, his title and company affiliation:

NCR 617

NCR 694

93. For the Field Deficiency Report logs (referenced in your answer to Question 158 of CASE's Ninth Set), please supply the following information:

- (a) Provide for each of the headings on the logs what each abbreviated item stands for and what each heading means.
- (b) Include Field Deficiency Report logs and/or Field Deficiency Reports in your explanation of the different logs and reports we have received requested in Question 30 of this pleading.
- (c) Include Field Deficiency Reports specifically in your answer to Questions 25 and 26 of this pleading.

94. Your answer to Question 160 of CASE's Ninth Set stated that the TUGCO NCR Log was first initiated on July 10, 1980.

How were the items now being shown on the TUGCO NCR Log tracked or kept up with prior to that time?

95. Provide for inspection and copying whatever document you refer to in your answer to 94 preceding. We will definitely want copies of this document, and will accept an authenticated copy.

96. Your answer to Question 102 of CASE's Ninth Set to Applicants indicated that you had no plans to call Mr. Lobbin as a witness.

- (a) Who of Applicants' employees is most knowledgeable about the Lobbin Report and could answer questions on cross-examination regarding it? Give such person's name, title, and company affiliation.
- (b) Provide Mr. Lobbin's mailing address and telephone number.
- (c) It seems reasonable to us that if you spent the time, effort, and money to hire a consultant such as Mr. Lobbin to prepare a report such as the Lobbin Report which deals specifically with the subject of Contention 5, you would logically call him as a witness.

Please explain the reason and rationale for not calling him as a witness in the upcoming hearings.

97. Please provide the names, titles, and company affiliations of the people employed by Applicants who are most knowledgeable and could best answer cross-examination questions regarding the following types of construction problems as discussed in NCR's, I&E Reports, etc.:

97. (continued):

- (a) Concrete.
- (b) Welding.
- (c) Cadwelding.
- (d) Anchor Bolts; Hilti Bolts.
- (e) Polar Cranes.
- (f) Westinghouse pumps.
- (g) Rebar.
- (h) Electrical cable.
- (i) Reactor Vessel.
- (j) Cable trays.
- (k) Liner plates and liners.
- (l) Hydrogen recombiners.
- (m) Pressurizer.
- (n) Steam Generators.
- (o) Pipe hangers.
- (p) Reactor vessel support pads.
- (q) Control Panel.
- (r) Pumps (feedwater, containment spray, safety injection, etc.).
- (s) Changes in engineering drawings and specifications.
- (t) Hayward Tyler pumps.

98. Do Applicants plan to call any of the persons referenced in your answer to 97. preceding as witnesses in the upcoming hearings?

to 98. preceding

99. If the answer is yes, please specify which persons you plan to call.

100. If the answer to 98. preceding is no, please also include in your answer to 98. preceding the mailing address of each person referenced in your answer.

101. Please advise whether rock overbreak or overexcavation occurred when excavation was being done for the following:

- (a) Containment Building #1
- (b) Containment Building #2
- (c) Safeguard Building #1
- (d) Safeguard Building #2
- (e) Auxiliary Buildings
- (f) Diesel Generator Building #1
- (g) Diesel Generator Building #2
- (h) Fuel Building
- (i) Any other Buildings

102. If the answer to any of the above is yes, please provide the following information for each:

- (a) Was this reported to the NRC?
- (b) If the answer to (a) is yes, please provide for each yes answer the following information:
 - (1) To whom with the NRC was it first reported verbally?
 - (2) To whom with the NRC was it first reported in writing?
 - (3) When was it first reported verbally to the NRC?
 - (4) By whom was it first reported verbally to the NRC (name, title, company affiliation)?
 - (5) When was it first reported in writing to the NRC?
 - (6) By whom was it first reported in writing to the NRC (name, title, company affiliation)?
 - (7) When and to whom with the Texas Utilities companies was it first reported by Brown & Root? (Supply name, title, company affiliation of person to whom it was reported.)
 - (8) Who (name, title, company affiliation) first reported it to someone with the Texas Utilities companies?
 - (9) Do Applicants anticipate calling the persons referenced in your answers to (4), (6), (7) and (8) as witnesses in the upcoming hearings?

102. (continued):

(10) If your answer to (9) is no, for each no answer include the mailing address for such person.

103. If the answer to any of the items referenced in 101. preceding is no, please provide the following information:

- (a) For each item to which no is the answer, who (name, title, company affiliation) made the decision not to report it to the NRC?
- (b) For each no answer, what was the rationale for not reporting it to the NRC?
- (c) Do Applicants anticipate calling the person(s) referenced in your answer to (a) above as witness(es) in the upcoming hearings?
- (d) If the answer to (c) is no, for each no answer include the mailing address for such person.

104. Provide for inspection and copying all documents (in the broadest sense of the word, including internal memoranda, handwritten notes, concrete pour records, etc.) regarding the rock overbreak or overexcavation and its repair, reporting, etc. referenced in 101. preceding.

Also provide for inspection and copying all charts, drawings, slides, photographs, etc. regarding this.

We will definitely want at a minimum all of the documents and slides supplied to CFUR in response to its interrogatories and requests to produce regarding the rock overbreak contention (No. 7).

105. Provide a brief assessment of the extent of the damage done to each of the items listed in 101. preceding or to the integrity of the bedrock around or under those buildings.

106. With reference to NCR C-650, please provide the following information:

- (a) The June 3, 1977 Interoffice Memo from Peter L. Bussolini, Project Quality Assurance Manager, Brown & Root, states:

"As the forms and decking were removed from the 812' mat placement in Containment No. 1,...B&R QC found a vertical crack that extended completely through the seven (7) foot thick mat near the center of its midspan across the cavity."

Please provide the following information:

- (1) How long (horizontally) was the crack?
- (2) Provide a drawing of the crack area. Provide the original drawing for inspection and copying, if it is available. We will definitely

106. (continued):

(a) continued:

(2) continued:

want a copy of the drawing, preferably of the full-size original if possible. We will accept an authenticated copy.

(b) Was this reported to the NRC?

(c) If the answer to (b) is yes, please provide the following information:

(1) To whom with the NRC was it first reported verbally?

(2) To whom with the NRC was it first reported in writing?

(3) When was it first reported verbally to the NRC?

(4) By whom was it first reported verbally to the NRC (name, title, company affiliation)?

(5) When was it first reported in writing to the NRC?

(6) By whom was it first reported in writing to the NRC (name, title, company affiliation)?

(7) When was it first reported by Brown & Root to Texas Utilities companies?

(8) To whom with the Texas Utilities companies was it first reported by Brown & Root (name, title, company affiliation)?

(9) Who (name, title, company affiliation) first reported it to someone with the Texas Utilities companies?

(10) Do Applicants anticipate calling the persons referenced in your answers to (4), (6), (8), and (9) as witnesses in the upcoming hearings?

(11) If your answer to (10) is no, for each no answer include the mailing address for such person.

(d) If the answer to (b) is no, please provide the following information:

(1) Who (name, title, company affiliation) made the decision not to report it to the NRC?

(2) What was the rationale for not reporting it to the NRC?

(3) Do Applicants anticipate calling the person referenced in your answer to (1) above as a witness in the upcoming hearings?

(4) If the answer to (3) above is no, please include the mailing address for such person.

106. (continued):

- (e) Provide for inspection and copying all documents (in the broadest sense of the word, including internal memoranda, handwritten notes, concrete pour records, etc.) regarding this matter. If there are any slides or photographs, provide them also.

We will definitely want copies of all of these documents. We will accept authenticated copies.

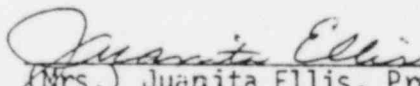
107. Please provide a copy of DC/DDA 1560 prior to its revocation and all its revisions (see NCR 857).

108. With further reference to 107. preceding, please supply the following information:

- (a) Please provide an explanation of why rescinding DC/DDA 1560 caused a large number of previously closed NCR's to be reopened for disposition.
- (b) What was the original basis for DC/DDA 1560 being used to disposition NCR's?
- (c) What was the reason or basis for rescinding DC/DDA 1560?
- (d) Who (name, title, company affiliation) made the decision to rescind DC/DDA 1560?
- (e) Please list the NCR's which are currently being reopened due to the rescinding of DC/DDA 1560.
- (f) At the time we inspected NCR M857 at CPSES (under which all the above-referenced NCR's have been grouped and reopened), we did not make a copy of the entire NCR due to its huge size. We did, however, reserve the right to have it copied in its entirety at a later time.
Please provide a copy of the entire NCR M857. We will accept an authenticated copy.

109. When we inspected NCR M972 at CPSES, we did not make a copy of it due to its huge size. We did, however, reserve the right to have it copied in its entirety at a later time. Please provide a copy of the entire NCR M972. We will accept an authenticated copy.

Respectfully submitted,


(Mrs.) Juanita Ellis, President
CASE (Citizens Association for Sound Energy)
1426 S. Polk
Dallas, Texas 75224
214/946-9446
214/941-1211, work, part-time

QUALITY ASSURANCE DEPARTMENT NONCONFORMANCE REPORT (NCR)

INDEXED

CPS1	STRRB	EMBEDX
PLANT CODE	SYSTEM CODE	COMPONENT CODE
1-4	5-10	11-16

X	2323-S1-0546REV1	DATE X
TAG/SPIN/IDENT NO.	DRAWING/SPECIFICATION NO.	SERIAL NO.
A E C D E F	G, (Units)	H, (Units)
	17 56	J, (Units)

CASE Attachment A

3511956812C03	B369
PURCHASE ORDER NUMBER	VEND CODE
56-69	70-73

47606	03341	X	4 EA	X	C-833R1	112377
MRR NUMBER	RIR NUMBER	VENDOR'S HEAT/LOT/BATCH NO.	COUNT	UNITS	PURCH'S OR NO.	RLS/HOLD NO. CODE
74-79	80-85	86-95	QUANTITY		106-111	STATUS
			96-106			112-121
						INPUT DATE
						122-127

(2) NONCONFORMING CONDITION:

48 "B" series Cadweld sleeves on Bostrom-Bergen embeds, piece marks B4-1, B4-2, B4-3, B4-4, have been installed incorrectly with the internal grooved end away from the washer plate. These embeds are shown on G&H drawing 2323-S1-0546, Rev. 1 and installed in RB #1, Elev. 823'-831'. The P.O. is 35-1195-6812-~~CO#2~~ CO#3
 Revised to correct nonconforming condition statement.

(3) PREPARED BY: R. D. Michels	(4) DATE: 11-23-77	(5) REVIEW/ APPROVAL: <i>[Signature]</i>	(6) DATE: 11-29-77
-----------------------------------	-----------------------	---	-----------------------

(9) DISPOSITION ASSIGNED TO: H. C. Dodd, Jr.	(10) DUE DATE: 12-9-77	(11) CORRECTIVE ACTION REQUEST: <input type="checkbox"/> Required <input checked="" type="checkbox"/> Not Required	(12) REPORTABLE DEFICIENCY: <input type="checkbox"/> POSSIBLE <input checked="" type="checkbox"/> NO
---	---------------------------	---	---

(13) DISPOSITION: REWORK _____ REPAIR _____ USE AS IS <input checked="" type="checkbox"/> SCRAP _____
--

A sample Cadweld from each assembly was removed and tested for engineering evaluation. The test concluded that the assemblies satisfied the design as installed. The subject sleeves removed for testing purposes are to be replaced in accordance with specification SS-11 and procedure CCP-19.

Reference DC/DDA 639

(14) CONSTR. REVIEW/ APPROVAL: <i>[Signature]</i>	(15) DATE: 11-29-77
(16) QA REVIEW/ APPROVAL: <i>[Signature]</i>	(17) DATE: 11-13-77
(18) CLIENT REVIEW/ APPROVAL: N/A <i>[Signature]</i>	(19) DATE: 1-1
(20) ENG. REVIEW/ APPROVAL: <i>[Signature]</i>	(21) DATE: 11-30-77
(22) ANI REVIEW/ APPROVAL: N/A <i>[Signature]</i>	(23) DATE: 1-1

(24) VERIFICATION: <input checked="" type="checkbox"/> Satisfactory <input type="checkbox"/> Unsatisfactory <input type="checkbox"/> Not Req'd.
(25) QA/ QC ENGR/ INSP. VERIFICATION: <i>[Signature]</i>
(26) DATE: 12-15-77
(27) ANI VERIFICATION: N/A <i>[Signature]</i>
(28) DATE: 1-1

(29) QA REVIEW/ CLOSURE: <i>[Signature]</i>	(30) DATE: 1-19-78
--	-----------------------

(31) REMARKS QA RECORD

NONE

RTN.	QA REVIEW
L	11-12-78
FILE NO.	NCR-78
SUBFILE NO.	C-833

RECEIVED

Brown & Root, Inc.

CASE Attachment B

QA RECORD

MAR 17 1980

QUALITY ASSURANCE DEPARTMENT
NONCONFORMANCE REPORT (NCR)

(1) NCR No. C-1335

PROJECT CPSES FILES NOTED

JOB NO. 35-1195

PAGE 1 OF 3

(2) UNIT	STRUCTURE/SYSTEM	Type/Component	TAG/ID NUMBER	LOCATION OR ELEVATION	RIR NO.
1	Containment #1	Concrete	101-8805-008 & 009	Northeast Quadrant Elev. 1038' 10"	N/A

(3) NONCONFORMING CONDITION

DOCUMENT VIOLATED: 2323-SS-9

REV 4

PARA 8.5

(4) TREND
CATEGORY

C-10

The specification noted above requires that curing of "Mass" concrete shall be in accordance with ACI-301-72, Chapter 14 which refers to Chapter 12 which states "Beginning immediately after placement, concrete shall be protected from premature drying, excessively hot or cold temperatures and mechanical injury, and shall be maintained with minimal moisture loss at a relatively constant temperature for the period necessary for hydration of the cement and hardening of the concrete."

A fire, caused by fuel spillage from a heater being used in the curing process, spalled concrete in an area approx. 8' wide x 9' high x 3/4" deep and possibly an area at the same location which is hidden by forms. This event took place on 1-26-79.

SEE PROJECT FIRE CHIEF LETTER DATED 1-30-79 (ATTACHED)

(5) REPORTED BY: Ray Brown	(6) DATE: 1/31/79	(9) REVIEW/APPROVAL: <i>BC Smith</i>	(10) DATE: 2/5/79
(7) PREPARED BY: Ray Brown	(8) DATE: 1/31/79	(11) ISSUED BY: <i>Paula Rawls</i>	(12) DATE: 2/5/79

(13) DISPOSITION ASSIGNED TO: U. D. Douglas	(14) DUE DATE: 2/19/79	(15) CORRECTIVE ACTION REQUEST: CAR NO. <input type="checkbox"/> Required <input checked="" type="checkbox"/> Not Required	(16) ASME CODE ITEM <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
--	---------------------------	---	--

(17) DISPOSITION: REWORK _____ REPAIR _____ USE AS IS ☒ SCRAP _____

Visual inspection of area in question indicates no apparent damage.

Remove loose spalled concrete and feather edge damage area into existing concrete.

(18) CONSTRUCTION REVIEW APPROVAL: <i>W.F. Tyler</i>	(19) DATE: 2/21/80	(20) QA/QC REVIEW APPROVAL: <i>Harry O Williams</i>	(21) DATE: 2/20/80
(22) ENG. REVIEW/APPROVAL: <i>George A. Allen</i>	(23) DATE: 2/26/80	(24) ANI REVIEW APPROVAL: N/A CH	(25) DATE: 2/26/80

(26) VERIFICATION:
☒ Satisfactory ☐ Unsatisfactory ☐ Not Req'd

(27) QA/QC ENGR/INSPECTION VERIFICATION: <i>Harry O Williams</i>	(28) DATE: 2/27/80
(29) ANI CONCURRENCE: N/A CH	(30) DATE: 2/27/80

(31) QA REVIEW CLOSURE: <i>JK Conover</i>	(32) DATE: 3/3/80
--	----------------------

(33) REMARKS: QA RECORD

RTN.	QA REVIEW
L	CH 3-12-80
FILE NO.	15.1
SUBFILE NO.	C-1335

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD A10:56

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)

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OFFICE OF SECRETARY
DOCKETING & SERVICE
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 Eleventh Set of Interrogatories to Applicants and Requests to Produce

have been sent to the names listed below this 7th day of May
1982, by: Express Mail where indicated by * and by First Class mail elsewhere.

* Administrative Judge Marshall E. Miller
U. S. Nuclear Regulatory Commission
Atomic Safety and Licensing Board Panel
Washington, D. C. 20555

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Atomic Safety and Licensing
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U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

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Atomic Safety and Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

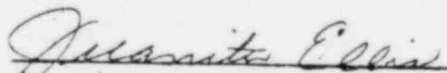
Atomic Safety and Licensing
Appeal Panel
U. S. Nuclear Regulatory Commission
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