

RELATED CORRESPONDENCE

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

DOCKETED  
USNRC

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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. 3)

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,

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. 2)" refers to Interrogatories Propounded by the State of Vermont to the Vermont Yankee Nuclear Power Corporation (Set. No. 2), dated June 6, 1990.

20. "Vermont Interrogatory (Set No. 3)" refers to Interrogatories Propounded by the State of Vermont to the Vermont Yankee Nuclear Power Corporation (Set. No. 3), dated July 24, 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 copies 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:
  - a. Describe in detail the specific portions of each document production request to which each person contributed.
  - b. Provide the most current resume available for each identified individual.
  - c. Describe the qualifications of each identified individual, including training and papers published.
2. Please produce for inspection and copying a legible color copy of each and every photograph identified in Attachment A to item 13 of its response to Vermont Interrogatory (Set No. 1) No. 79. If in response to Vermont Interrogatory (Set No. 1) No. 79 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
3. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 2) No. 8.b. If in response to Vermont Interrogatory (Set No. 2) No. 8 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
4. Please produce for inspection and copying procedures AP 0206 and AP 4024, as identified in response to Vermont Interrogatory (Set No. 2) No. 10. If in response to Vermont Interrogatory (Set No. 2) No. 10 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
5. Please produce for inspection and copying the documentation of results of all vibration analyses in the last five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 10.
6. Please produce for inspection and copying procedure AP 0200, as identified in response to Vermont Interrogatory (Set No. 2) No. 16. If in response to Vermont Interrogatory (Set No. 2) No. 16 Vermont Yankee has not

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

7. Please produce for inspection and copying each and every Visi-card PM that specifies requirements for lube oil analysis, as identified in response to Vermont Interrogatory (Set No. 2) No. 16.
8. Please produce for inspection and copying all Mobil Oil reports of lube oil analysis in the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 16.
9. For each and every Mobil Oil Corporation employee who has been responsible for or has performed oil analysis testing and any corrective recommendations at the Vermont Yankee plant at any time in the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 17, 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.
10. Please produce for inspection and copying all documentation of the Vermont Yankee Operations Department Performance Monitoring Program, as identified in response to Vermont Interrogatory (Set No. 2) No. 22.
11. Please produce for inspection and copying all documentation of infrared thermography evaluations in the last five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 22. If in response to Vermont Interrogatory (Set No. 2) No. 22 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
12. Please produce for inspection and copying all documentation of the 653 equipment faults detected by infrared thermography (in 1981, during a review of 22 industrial facilities) prior to equipment failure as identified in response to Vermont Interrogatory (Set No. 2) No. 23.
13. Please produce for inspection and copying the document identified by Vermont Yankee in response to Vermont Interrogatory (Set No. 2) No. 23.b. If in response to Vermont Interrogatory (Set No. 2) No. 23 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.



14. For each and every Yankee Atomic Electric Corporation employee who has been responsible for or has performed infrared thermography at the Vermont Yankee plant at any time since January 1, 1986, as identified in response to Vermont Interrogatory (Set No. 2) No. 23.c, 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.
15. Please produce for inspection and copying all documentation of spectrography and atomic absorption spectrophotometry evaluations in the past five years, as identified by Vermont Yankee in response to Vermont Interrogatory (Set No. 2) No. 25. If in response to Vermont Interrogatory (Set No. 2) No. 25 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
16. For each and every Mobil Oil Corporation employee who has been responsible for or has performed spectrography and atomic absorption spectrophotometry evaluations for the Vermont Yankee plant at any time in the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 26, 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.
17. Please produce for inspection and copying procedure AP 0150, as identified in response to Vermont Interrogatory (Set No. 2) No. 31. If in response to Vermont Interrogatory (Set No. 2) No. 31 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
18. Please produce for inspection and copying all documentation of bearing temperature trending in accordance with the Plant Performance Monitoring Program since October 1, 1989, as identified by Vermont Yankee in response to Vermont Interrogatory (Set No. 2) No. 31.
19. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 2) No. 32.b. If in response to Vermont Interrogatory (Set No. 2) No. 32 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

20. Please produce for inspection and copying all documentation of age degradation mechanism detection by bearing temperature trending, as identified by Vermont Yankee in response to Vermont Interrogatory (Set No. 2) No. 32.
21. Please produce for inspection and copying all documentation of each and every structure, system or component for which the predictive maintenance method of leakage detection was used during the past five years, as identified by Vermont Yankee in response to Vermont Interrogatory (Set No. 2) No. 33. If in response to Vermont Interrogatory (Set No. 2) No. 33 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
22. Please produce for inspection and copying procedures DP 4153 and AP 4116, as identified in response to Vermont Interrogatory (Set No. 2) No. 34.a.
23. Please produce for inspection and copying all documentation of main condenser and secondary containment leakage surveillances for the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 34.c. If in response to Vermont Interrogatory (Set No. 2) No. 34 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
24. For each and every Vermont Yankee and Yankee Atomic Electric Corporation employee who has been responsible for or has performed leakage detection at the Vermont Yankee plant at any time in the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 35.c, 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.
25. Please produce for inspection and copying procedures OP 5220, OP 5225, OP 5235, OP 5245 and Maintenance Department Guideline - 480 VAC Switchgear and MCCs, as identified in response to Vermont Interrogatory (Set No. 2) No. 37. If in response to Vermont Interrogatory (Set No. 2) No. 37 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

26. Please produce for inspection and copying all documentation of insulation resistance (meggering) evaluations in the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 37.
27. Please produce for inspection and copying all documentation of age degradation mechanism detection by insulation resistance (meggering) evaluation, as identified in response to Vermont Interrogatory (Set No. 2) No. 38.b.
28. Please produce for inspection and copying all documentation of all polarization index evaluations in the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 40. If in response to Vermont Interrogatory (Set No. 2) No. 40 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
29. Please produce for inspection and copying all documentation of the Heat Exchanger Preventive Maintenance Program, as identified in response to Vermont Interrogatory (Set No. 2) No. 42. If in response to Vermont Interrogatory (Set No. 2) No. 42 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
30. Please produce for inspection and copying all documentation of the Heat Exchanger Preventive/Predictive Maintenance Program, as identified in response to Vermont Interrogatory (Set No. 2) No. 43.a. If in response to Vermont Interrogatory (Set No. 2) No. 43 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
31. Please produce for inspection and copying all documentation of eddy current testing the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 43.c.
32. For each and every subcontract employee who has been responsible for or has performed eddy current testing at the Vermont Yankee plant in the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 43.c, 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.



33. For each and every Vermont Yankee employee who has been responsible for or has performed eddy current testing at the Vermont Yankee plant in the past five years, as identified in response to Vermont Interrogatory (Set No. 2) No. 44, 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.
34. Please produce for inspection and copying all documentation for usage of the INPO NPRDS data base and its applicability to the Vermont Yankee plant. Documentation should include, but not be limited to, preparation and evaluation of CFARs, as identified in response to Vermont Interrogatory (Set No. 2) No. 49.
35. Please produce for inspection and copying all CFARs, commencing May 1990, for the Vermont Yankee plant, as identified in response to Vermont Interrogatory (Set No. 2) No. 49. If in response to Vermont Interrogatory (Set No. 2) No. 49 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
36. Please produce for inspection and copying all INPO NPRDS component specific failure rate reports since inception ("approximately mid-1989") for the Vermont Yankee plant. Documentation should include, but not be limited to, reports on uninterruptible power supply and MOVs, as identified in response to Vermont Interrogatory (Set No. 2) No. 49.
37. Please produce for inspection and copying all details of Vermont Yankee plant component failures that have been reported to INPO for inclusion in the NPRDS data base, as identified in response to Vermont Interrogatory (Set No. 2) No. 50. If in response to Vermont Interrogatory (Set No. 2) No. 50 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
38. Please produce for inspection and copying all INPO evaluations of maintenance activities at Vermont Yankee, as identified in response to Vermont Interrogatory (Set No. 2) No. 52. If in response to Vermont Interrogatory (Set No. 2) No. 52 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

39. Please produce for inspection and copying all Vermont Yankee performance indicators provided to INPO on a quarterly basis beginning in 1985, as identified in response to Vermont Interrogatory (Set No. 2) No. 53. If in response to Vermont Interrogatory (Set No. 2) No. 53 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
40. Please produce for inspection and copying all semi-annual and/or annual reports from INPO showing industry comparisons for performance indicators beginning in 1985, as identified in response to Vermont Interrogatory (Set No. 2) No. 54. If in response to Vermont Interrogatory (Set No. 2) No. 54 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
41. Please produce for inspection and copying "Assessment of Maintenance Practices at the Vermont Yankee Nuclear Power Station (Reference INPO 85-038); VY-88-1250-1," as identified in response to Vermont Interrogatory (Set No. 2) No. 55. If in response to Vermont Interrogatory (Set No. 2) No. 55 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
42. Please produce for inspection and copying all documentation of the implementation of the recommendations in the INPO report "Assessment of Maintenance Practices at the Vermont Yankee Nuclear Power Station (Reference INPO 85-038); VY-88-1250-1," as identified in response to Vermont Interrogatory (Set No. 2) No. 55.
43. Please produce for inspection and copying INPO Guideline 85-038, "Guidelines for the Conduct of Maintenance at Nuclear Power Stations", as identified in response to Vermont Interrogatory (Set No. 2) No. 55.
44. Please produce for inspection and copying all INPO assessments of Vermont Yankee since 1980.
45. Please produce for inspection and copying all INPO SOERs, issued since 1980, applicable to Vermont Yankee.

46. Please produce for inspection and copying all INPO guidelines for maintenance, applicable to Vermont Yankee.
47. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 85-038, "Guidelines for the Conduct of Maintenance at Nuclear Power Stations", as identified in response to Vermont Interrogatory (Set No. 2) No. 79. If Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
48. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who has been responsible for or has reviewed, commented upon, or used INPO Guideline 85-038, "Guidelines for the Conduct of Maintenance at Nuclear Power Stations" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 79, 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.
49. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 83-024, "Planned Valve Repacking as Preventive Maintenance", as identified in response to Vermont Interrogatory (Set No. 2) No. 82. If Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
50. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who has been responsible for or has reviewed, commented upon, or used INPO Guideline 83-024, "Planned Valve Repacking as Preventive Maintenance" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 82, 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.
51. Please produce for inspection and copying all documentation of the preventive valve repacking program, as identified in response to Vermont Interrogatory (Set No. 2) No. 82. If in response to Vermont Interrogatory



(Set No. 2) No. 82 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

52. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 83-045, "Plant Material Deficiency Identification", as identified in response to Vermont Interrogatory (Set No. 2) No. 83. If Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
53. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 83-045, "Plant Material Deficiency Identification" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 83, 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.
54. Please produce for inspection and copying INPO Guideline 83-047, "Component Verification and System Validation Guidelines."
55. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 83-047, "Component Verification and System Validation Guidelines", as identified in response to Vermont Interrogatory (Set No. 2) No. 84. If Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
56. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 83-047, "Component Verification and System Validation Guidelines" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 84, 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.

57. Please produce for inspection and copying procedures AP 0028 and AP 0312, as identified in response to Vermont Interrogatory (Set No. 2) No. 85. If in response to Vermont Interrogatory (Set No. 2) No. 85 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
58. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 84-010, "Vendor Equipment Technical Information Program", as identified in response to Vermont Interrogatory (Set No. 2) No. 85. If Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
59. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 84-010, "Vendor Equipment Technical Information Program" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 85, 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.
60. Please produce for inspection and copying procedures AP 0150 and AP 4000, as identified in response to Vermont Interrogatory (Set No. 2) No. 86.
61. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 84-025, "Operations Surveillance Program", as identified in response to Vermont Interrogatory (Set No. 2) No. 86. If in response to Vermont Interrogatory (Set No. 2) No. 86 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
62. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 84-025, "Operations Surveillance Program" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 86, 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.



63. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 84-026, "Setpoint Change Control Program", as identified in response to Vermont Interrogatory (Set No. 2) No. 87. If in response to Vermont Interrogatory (Set No. 2) No. 87 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
64. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 84-026, "Setpoint Change Control Program" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 87, 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.
65. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 87-009, as identified in response to Vermont Interrogatory (Set No. 2) No. 88. If in response to Vermont Interrogatory (Set No. 2) No. 88 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
66. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 87-009 in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 88, 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.
67. Please produce for inspection and copying INPO Guideline 85-001, "Performance Objectives and Criteria for Operating and Near-term Operating License Plants."
68. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 85-001, "Performance Objectives and Criteria for Operating and Near-term Operating



License Plants", as identified in response to Vermont Interrogatory (Set No. 2) No. 89. If in response to Vermont Interrogatory (Set No. 2) No. 89 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

69. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 85-001, "Performance Objectives and Criteria for Operating and Near-term Operating License Plants" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 89, 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.
70. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 85-010, "Surveillance and Periodic Task Scheduling Program", as identified in response to Vermont Interrogatory (Set No. 2) No. 90. If in response to Vermont Interrogatory (Set No. 2) No. 90 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
71. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 85-010, "Surveillance and Periodic Task Scheduling Program" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 90, 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.
72. Please produce for inspection and copying DWO 85-016, "Temporary Modification Control", identified in Vermont Interrogatory (Set No. 2) No. 92.
73. Please produce for inspection and copying procedure AP 0831, as identified in response to Vermont Interrogatory (Set No. 2) No. 93.

74. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 85-026, "Writing Guideline for Maintenance, Test and Calibration Procedures", as identified in response to Vermont Interrogatory (Set No. 2) No. 93. If in response to Vermont Interrogatory (Set No. 2) No. 93 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
75. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 85-026, "Writing Guideline for Maintenance, Test and Calibration Procedures" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 93, 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.
76. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 85-031, "Guidelines for the Conduct of Technical Support Activities at Nuclear Power Stations", as identified in response to Vermont Interrogatory (Set No. 2) No. 94. If in response to Vermont Interrogatory (Set No. 2) No. 94 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
77. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 85-031, "Guidelines for the Conduct of Technical Support Activities at Nuclear Power Stations" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 94, 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.
78. Please produce for inspection and copying procedure AP 0021, as identified in response to Vermont Interrogatory (Set No. 2) No. 95.
79. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 85-032,



"Preventive Maintenance", as identified in response to Vermont Interrogatory (Set No. 2) No. 95. If in response to Vermont Interrogatory (Set No. 2) No. 95 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

80. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 85-032, "Preventive Maintenance" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 95, 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.
81. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 86-002, "Maintenance History Program", as identified in response to Vermont Interrogatory (Set No. 2) No. 96. If in response to Vermont Interrogatory (Set No. 2) No. 96 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
82. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 86-002, "Maintenance History Program" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 96, 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.
83. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 2) No. 97. Documents should include, but not be limited to, documentation of the following:
  - a. Vermont Yankee's Snubber Maintenance Program;
  - b. Procedure OP 5203; and
  - c. Each and every documentation of snubber vendor information.



84. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 86-014, "Snubber Maintenance Program", as identified in response to Vermont Interrogatory (Set No. 2) No. 97. If in response to Vermont Interrogatory (Set No. 2) No. 97 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
85. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 86-014, "Snubber Maintenance Program" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 97, 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.
86. Please produce for inspection and copying all documentation of Vermont Yankee's performance based training program, as identified in response to Vermont Interrogatory (Set No. 2) No. 98. If in response to Vermont Interrogatory (Set No. 2) No. 98 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
87. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 86-018, "Guidelines for Training and Qualification of Maintenance Personnel" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 98, 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.
88. Please produce for inspection and copying plant procedure 0312, as identified in response to Vermont Interrogatory (Set No. 2) No. 99.
89. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 87-009, "Control of Vendor Manuals", as identified in response to Vermont Interrogatory (Set No. 2) No. 99. If in response to Vermont Interrogatory (Set No. 2) No. 99 Vermont Yankee has not identified all documents

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

90. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 87-009, "Control of Vendor Manuals" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 99, 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.
91. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 87-028, "Post-Maintenance Testing" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 100, 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.
92. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 88-022, "Vendor Manual Specification and Procurement", as identified in response to Vermont Interrogatory (Set No. 2) No. 101. If in response to Vermont Interrogatory (Set No. 2) No. 101 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
93. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented or, or used INPO Guideline 88-022, "Vendor Manual Specification and Procurement" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 101, 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.
94. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 89-009, "Plant Predictive Maintenance", as identified in response to Vermont Interrogatory (Set No. 2) No. 102. If in response to Vermont Interrogatory



(Set No. 2) No. 102 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

95. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 89-009, "Plant Predictive Maintenance" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 102, 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.
96. Please produce for inspection and copying INPO Operation and Maintenance Reminder O&MR-308, identified in Vermont Interrogatory (Set No. 2) No. 103. If in response to Vermont Interrogatory (Set No. 2) No. 103 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
97. Please produce for inspection and copying INPO Guideline 87-030, "Performance Objectives and Criteria for Corporate Evaluations."
98. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 87-030, "Performance Objectives and Criteria for Corporate Evaluations", as identified in response to Vermont Interrogatory (Set No. 2) No. 104. If in response to Vermont Interrogatory (Set No. 2) No. 104 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
99. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 87-030, "Performance Objectives and Criteria for Corporate Evaluations" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 104, 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.



100. Please produce for inspection and copying INPO Guideline 85-002, "The Accreditation of Training in the Nuclear Power Industry."
101. Please produce for inspection and copying all documentation of Vermont Yankee reviewing, commenting upon, or using INPO Guideline 85-002, "The Accreditation of Training in the Nuclear Power Industry", as identified in response to Vermont Interrogatory (Set No. 2) No. 105. If in response to Vermont Interrogatory (Set No. 2) No. 105 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
102. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) who reviewed, commented on, or used INPO Guideline 85-002, "The Accreditation of Training in the Nuclear Power Industry" in the development of Vermont Yankee's maintenance program, as identified in response to Vermont Interrogatory (Set No. 2) No. 105, 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.
103. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) identified in response to Vermont Interrogatory (Set No. 3) No. 9.d, 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.
104. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 9.e. If in response to Vermont Interrogatory (Set No. 3) No. 9 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
105. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 12.b. If in response to Vermont Interrogatory (Set No. 3) No. 12 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

106. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 12.b.
107. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 16.b.
108. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 16.d.
109. If in response to Vermont Interrogatory (Set No. 3) No. 16 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
110. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 26.a. If in response to Vermont Interrogatory (Set No. 3) No. 26 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
111. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 32. If in response to Vermont Interrogatory (Set No. 3) No. 32 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
112. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 37.a. If in response to Vermont Interrogatory (Set No. 3) No. 37 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
113. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 38. If in response to Vermont Interrogatory (Set No. 3) No. 38 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
114. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 39. If in response to



Vermont Interrogatory (Set No. 3) No. 39 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

115. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 43. If in response to Vermont Interrogatory (Set No. 3) No. 43 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
116. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 45. If in response to Vermont Interrogatory (Set No. 3) No. 45 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
117. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 46. If in response to Vermont Interrogatory (Set No. 3) No. 46 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
118. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 47. If in response to Vermont Interrogatory (Set No. 3) No. 47 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
119. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 48. If in response to Vermont Interrogatory (Set No. 3) No. 48 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
120. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 49. If in response to Vermont Interrogatory (Set No. 3) No. 49 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.



121. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 51. If in response to Vermont Interrogatory (Set No. 3) No. 51 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
122. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) identified in response to Vermont Interrogatory (Set No. 3) No. 52.b, 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.
123. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 52.c. If in response to Vermont Interrogatory (Set No. 3) No. 52 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
124. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 55. If in response to Vermont Interrogatory (Set No. 3) No. 55 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
125. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 56. If in response to Vermont Interrogatory (Set No. 3) No. 56 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
126. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 58. If in response to Vermont Interrogatory (Set No. 3) No. 58 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
127. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 60. If in response to Vermont Interrogatory (Set No. 3) No. 60 Vermont Yankee has not

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

128. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 62. If in response to Vermont Interrogatory (Set No. 3) No. 62 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
129. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 64. If in response to Vermont Interrogatory (Set No. 3) No. 64 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
130. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 66. If in response to Vermont Interrogatory (Set No. 3) No. 66 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
131. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 74. If in response to Vermont Interrogatory (Set No. 3) No. 74 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
132. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 75. If in response to Vermont Interrogatory (Set No. 3) No. 75 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
133. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 76.a.
134. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 76.b.



135. If in response to Vermont Interrogatory (Set No. 3) No. 76 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
136. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 77.a.
137. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 77.b.
138. If in response to Vermont Interrogatory (Set No. 5) No. 77 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
139. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 80. If in response to Vermont Interrogatory (Set No. 3) No. 80 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
140. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) identified in response to Vermont Interrogatory (Set No. 3) No. 81, 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.
141. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) identified in response to Vermont Interrogatory (Set No. 3) No. 82, 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.
142. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) identified in response to Vermont Interrogatory (Set No. 3) No. 83, 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.



143. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) identified in response to Vermont Interrogatory (Set No. 3) No. 84, 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.
144. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 85.a.
145. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 85.b.
146. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 85.c.
147. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 85.d.
148. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 85.e.
149. If in response to Vermont Interrogatory (Set No. 3) No. 85 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
150. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 88. If in response to Vermont Interrogatory (Set No. 3) No. 88 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
151. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 98. If in response to Vermont Interrogatory (Set No. 3) No. 98 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

152. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 104.c.
153. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 104.e.
154. If in response to Vermont Interrogatory (Set No. 3) No. 104 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
155. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 111. If in response to Vermont Interrogatory (Set No. 3) No. 111 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
156. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 112. If in response to Vermont Interrogatory (Set No. 3) No. 112 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
157. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 113. If in response to Vermont Interrogatory (Set No. 3) No. 113 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
158. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 114. If in response to Vermont Interrogatory (Set No. 3) No. 114 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
159. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 115. If in response to Vermont Interrogatory (Set No. 3) No. 115 Vermont Yankee has not

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

160. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 116. If in response to Vermont Interrogatory (Set No. 3) No. 116 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
161. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 117. If in response to Vermont Interrogatory (Set No. 3) No. 117 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
162. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 118. If in response to Vermont Interrogatory (Set No. 3) No. 118 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
163. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 119. If in response to Vermont Interrogatory (Set No. 3) No. 119 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
164. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 120. If in response to Vermont Interrogatory (Set No. 3) No. 120 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
165. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 122. If in response to Vermont Interrogatory (Set No. 3) No. 122 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

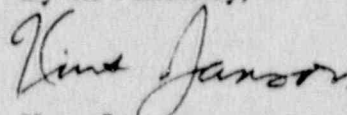


166. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 123. If in response to Vermont Interrogatory (Set No. 3) No. 123 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
167. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 133. If in response to Vermont Interrogatory (Set No. 3) No. 133 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
168. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 137. If in response to Vermont Interrogatory (Set No. 3) No. 137 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
169. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 138. If in response to Vermont Interrogatory (Set No. 3) No. 138 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
170. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 140. If in response to Vermont Interrogatory (Set No. 3) No. 140 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
171. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 141. If in response to Vermont Interrogatory (Set No. 3) No. 141 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
172. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 147. If in response to Vermont Interrogatory (Set No. 3) No. 147 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

173. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 149.c. If in response to Vermont Interrogatory (Set No. 3) No. 149 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
174. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 155. If in response to Vermont Interrogatory (Set No. 3) No. 155 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
175. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 156.b. If in response to Vermont Interrogatory (Set No. 3) No. 156 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
176. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 162. If in response to Vermont Interrogatory (Set No. 3) No. 162 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
177. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 187. If in response to Vermont Interrogatory (Set No. 3) No. 187 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.
178. For each and every Vermont Yankee employee (direct or contract) and Yankee Atomic Electric Corporation employee (direct or contract) identified in response to Vermont Interrogatory (Set No. 3) No. 189, 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.
179. Please produce for inspection and copying all documents identified in response to Vermont Interrogatory (Set No. 3) No. 190. If in response to

Vermont Interrogatory (Set No. 3) No. 190 Vermont Yankee has not identified all documents requested to be identified by that interrogatory, please produce for inspection and copying all such documents.

By its Attorney,

A handwritten signature in cursive script, appearing to read "Kurt Janson".

Kurt Janson  
Special Assistant Attorney General  
Department of Public Service  
120 State Street  
Montpelier, Vermont 05602  
(802) 828-2811

Dated: July 24, 1990