

RELATED CORRESPONDENCE
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

04728783
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD MAY -2 A10:36

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 FOURTEENTH SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE TO APPLICANTS

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

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

1. Each interrogatory should be answered fully in writing, under oath or affirmation.
2. Each interrogatory or document 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, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.
3. Each document provided should include a sworn statement of its authenticity.
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.

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5. Identify the person providing each answer, response, or document.
6. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the past directives of the Licensing Board. Because of the time restrictions under which we are presently working, we request that supplementation be made on an expedited basis.
7. For each item supplied in response to a 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).
8. The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, slides, internal memoranda, handwritten notes, tape recordings, and any other data compilations from which information can be obtained.

CASE'S INTERROGATORIES AND REQUESTS TO PRODUCE TO APPLICANTS

All of these interrogatories and requests for documents are derived directly from information contained in the "CAT Report" (Construction Appraisal Team Inspection Report 50-445/83-18, 50-446/83-12). Due to the press of time, we are limiting our discovery requests at this time to the matters which we believe will be covered in the upcoming May 16-20 hearings, either during cross-examination testimony or through direct testimony of CASE Witness Jack Doyle. However, we do plan to file additional discovery

requests regarding other portions of the "CAT Report" at a later time, as indicated in the April 25, 1983 conference call. Therefore, Applicants should not construe this instant request as being all of the interrogatories and requests for documents which we will be filing regarding the "CAT Report." We will file the additional requests as soon as possible in order to facilitate Applicants' speedy response to those requests.

We have indicated in parenthesis following each item the page number from the "CAT Report" wherein the information sought is referenced.

1. Supply the names of the following individuals (III-3, paragraph one):
 - (a) Texas Utilities Services, Inc. (TUSI) Technical Services Supervisor (responsible for engineering aspects);
 - (b) TUSI QA Specialist Supervisor and As-Built Coordinator (responsible for field inspections).
2. For each of the individuals identified in 1(a) and 1(b) above, provide a copy of his/her resume (if available) and state the specific qualifications, training, educational, and work background each individual possesses. Give particular attention to such qualifications, etc. insofar as they relate to each individual's position as stated in 1(a) and 1(b).
3. Supply the names, titles, organization and company employed by, and resume (or other information, if resume is not available, regarding each individual's qualifications, training, educational, and work background) for each person who participated in the decision which

was made to use anything other than Nonconformance Reports (NCR's) (such as punch-lists, Design Change Authorizations (DCA's), Design Change/Design Deviation Authorization (DC/DDA), Component Modification Cards (CMC's), Request for Information or Clarification (RFIC), etc.) to document discrepancies between detail drawings and as-built hardware, conditions which were considered to be only "potential nonconformances," documented deficiencies relative to installation, design changes resulting from identified problems or deviations from design drawings, etc.

Include in your answer for each individual identified the part such individual played in the decision, whether such individual's involvement was in the initial, intermediate, or final decision-making stage of the decision, which particular type of documentation (such as punch-lists, DCA's, etc.) was involved in each individual's participation, and all other pertinent details needed to determine exactly how this came about. If there is more than one area (such as electrical engineering, piping support engineering, piping and mechanical engineering, etc.), identify each such area and each individual's specific involvement in each area.

(III-3, second paragraph; IX-1 thru -10.)

4. What is the Applicants' justification for using anything other than Nonconformance Reports (NCR's) to document discrepancies, nonconformances, etc. (see 3. above)?
5. Is the justification discussed in 4. above contained anywhere in Applicants' FSAR? If so, identify the specific sections and pages.

6. Provide specific details regarding how each of the methods (other than Nonconformance Reports) identified in 3. preceding is used to trend nonconformances, discrepancies, etc.
7. Provide copies of all trending of each of the methods identified in 3. preceding.
8. CASE's 5/7/82 Eleventh Set of Interrogatories to Applicants and Requests to Produce asked if any other trending had been done other than for the specific items which we had already requested, and if so to supply details regarding such trending (Questions 25 and 26, page 12). Applicants' 5/17/82 Answers to CASE's Eleventh Set of Interrogatories and the May 27, 1982 letter supplementing those Answers did not identify most of the items used to identify nonconformances, discrepancies, etc. referenced in 3. preceding.

What was Applicants' rationale for not identifying and supplying the information requested regarding those items in response to CASE's 5/7/82 Eleventh Set?

9. Supply copies of the documentation packages for each of the Support/ Restraints listed at the top of page III-4 (discussed on III-3, III-4, and III-8), including all drawings, CMC's, etc.
10. Supply copies of the following documents (III-4):
 - (a) Small Bore General Notes Drawing CP-AA-001
 - (b) QI-QAP-11.1-28, Rev. 16, "Fabrication, Installation Inspections of ASME Component Supports, Class 1, 2, and 3"
 - (c) QI-QAP-11.1-28A, Rev. 0, "Installation Inspection of ASME Class 1, 2 and 3 Snubbers"
 - (d) QI-QP-11.2-3, Rev. 11, "Torquing and Spacing of Concrete Anchor Bolts."

11. Supply copies of the following drawings, as they existed at the time of the CAT report and all subsequent revisions and CMC's (III-5):

CS-1-063-028-S32R

AF-1-059-001-S33R

H-RC-1-RB-039-015-2

H-CS-1-RB-017-001-2

H-RC-1-RB-038-004-2

DD-2-019-007-F33R

RC-1-075-026-C61R

CS-1-001-016-C42K

FW-1-017-702-C52K

SW-1-102-716-Y33R

SW-1-003-002-A33R

SI-1-044-026-S32R

H-GH-X-AB-0042-003

The "confusing drawings which show U-bolts with 1/16 inch clearance required, but also with double nuts on the outside of the retaining plate" referred to on page III-5, last paragraph. (We are also including a question to the NRC regarding this item, in case they need to help Applicants identify the specific drawings referenced.)

12. What is the acceptance criteria currently being used regarding the U-bolt installations (III-5, last paragraph)?
13. Supply copies of the acceptance criteria currently being used regarding the U-bolt installations (III-5, last paragraph), as well as the acceptance criteria which was being used at the time of the CAT report (if different from what is currently being used).
14. Supply copies of Procedure CP-QAP-12.1 (III-6, first paragraph).

15. Supply copies of the fifteen small bore support and six large bore support drawings which were current during the time of the CAT Report, and copies of all subsequent revisions, including CMC's, etc.
16. Supply copies of any NCR's, DCA's, RFIC's, or other items used to document any changes, problems, discrepancies, etc. regarding the supports referenced in 15. preceding following the CAT inspector's review. Include anything that was written up regarding the missing high strength pin and the improper clamp spacer (whether by NCR, RFIC, DCA, memo, or whatever).
17. Supply copies of the 13 supports/restraints which were returned by the ANI to B&R QC due to undersized or otherwise unacceptable welds^{2nd paragraph}, (III-6A include all drawings, CMC's, and other information contained in the packages of these 13 supports.
18. Supply copies of the following drawings, in the form that was current at the time of the CAT inspector's review, and any subsequent revisions, including CMC's, etc. (III-6, paragraph 3):
CS-1-063-046-S22K
FW-1-098-008-C62S
CC-X-032-700-A43R
CC-1-161-004-S53R
CC-1-131-013-S43R
19. Supply copies of any and all NCR's (or other documents used to identify and deal with any changes, problems, discrepancies, etc.) for the items listed in 18. preceding.
20. Supply copies of the following drawings, in the form that was current at the time of the CAT inspector's review, and any subsequent revisions, including CMC's, etc. (III-7, first paragraph):

20. (continued):

MS-1-003-003-C72S

SI-039-019-S22R

SW-1-026-003-J03R

21. Supply copies of any and all NCR's (or other documents used to identify and deal with any changes, problems, discrepancies, etc.) for the items listed in 20. preceding.
22. Supply a listing of the 33 QC accepted supports that had been disassembled or completely removed without authorization, which had been identified by the as-built survey team at one point in time. (III-7, first paragraph.)

Also supply copies of all memos or other information regarding the disassembling and removal of such supports, including the memo referred to in the statement by the CAT inspector "These conditions were not documented in any system that would provide long term corrective action, but were referred to the construction organization via memo." (III-7, first paragraph.)

23. Supply a copy of Procedure QI-QP-11.16-1, Rev. 14, "Installation Inspections of NNS Seismic Category II Supports for Class V Piping." (III-7, second paragraph.)
24. Supply the name of the QA/QC Civil Mechanical Supervisor who "issued a memorandum directing QC supervisors that discrepancies are to be documented on IRs only." (III-7, second paragraph.)
25. Supply a copy of the memorandum "directing QC supervisors that discrepancies are to be documented on IRs only." (III-7, second paragraph.)

26. What has been the response of the Applicants to the fact that the QA/QC Civil Mechanical Supervisor had issued a memorandum directing QC supervisors that discrepancies are to be documented on IRs only?
27. Supply a copy of procedure CP-QP-16.0, "Nonconformances." (III-7, second paragraph.)
28. Provide copies of all other procedures relating to inspection of supports which we have not specifically requested herein, including the written instructions/checklist for VCD inspections. (III-7, third paragraph.)
29. Supply a copy of the "QC Checklist for Snubber Installation." (III-8, third paragraph.)
30. Supply copies of the following Pipe support drawings as they existed at the time of the CAT inspector's review, and all subsequent revisions, including CMC's, etc. (IV-1 and IV-2.):

SI-1-SB-23B-006-2

SI-2-031-425-Y32R

SI-1-037-005-S32A

CS-1-063-008-S22R

CC-1-136-706-E63R

SI-1-092-008-C41K

RH-1-001-001-C41S

RC-1-075-026-C61R

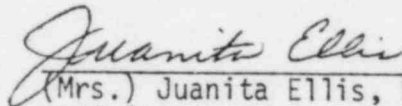
FW-1-017-001-S62K

RC-1-015-708-C41R

CS-1-SB-059-003-2

As the Board Chairman suggested in the conference call 4/25/83, we are sending this Fourteenth Set to Applicants in two sections. We will be supplementing our requests tomorrow. We are closing this off right now to ensure its getting into the mail in a timely fashion.

Respectfully submitted,



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