

4/28/83

DOCKETED  
USNRCUNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'83 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 50-446CASE'S FOURTH SET OF INTERROGATORIES  
AND REQUESTS TO PRODUCE TO NRC STAFF

Pursuant to 2.720(h)(2)( CASE (Citizens Association for Sound Energy),  
Intervenor herein, hereby f this, its Fourth Set of Interrogatories and  
Requests to Produce to NRC Staff.

Please answer the following interrogatories and requests for documents  
in the manner set forth herewith:

1. Each interrogatory should be answered fully in writing, under oath or affirmation.
2. Please identify the person(s) who answer each interrogatory, their title, location, etc.
3. Each interrogatory or document response should include all pertinent information known to the NRC Staff, its officers, directors or employees, their agents, advisors or counsel. Employees is to be construed in the broad sense of the word, including specifically any consultants, sub-contractors, and anyone else performing work or services on behalf of the NRC Staff or its agents or sub-contractors.
4. Each document provided should include a sworn statement of its authenticity, or a stipulation that it is authentic.
5. Please answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not

combine answers.

6. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the past directive 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 NRC STAFF

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, the NRC Staff 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' and NRC Staff's 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. Please identify the specific individual who prepared each Section of the CAT Report: I; II; III; IV; V; VI; VII; VIII; IX; Appendix A, Executive Summary; Appendix B, Potential Enforcement Findings.

Include in such identification each individual's title, NRC office out of which such individual works (Region IV; Headquarters, Washington; etc.), and state the specific qualifications, training, educational, and work background each individual possesses (and a copy of each individual's resume if available).

2. Will the individuals identified in 1. preceding as having prepared the following sections of the CAT Report be testifying in the May 16-20 hearings: III; IV; VII; VIII; IX; Appendix A, Executive Summary; Appendix B, Potential Enforcement Findings?
3. If the answer to any of the items in 2. preceding is no, who is expected to testify regarding each such Section?
4. With regard to each individual identified in 3. preceding, what is such individual's qualifications, training, educational, and work background insofar as they relate to such individual's expertise regarding the specific Section of the CAT Report about which such individual will

be testifying? Also, what personal and detailed knowledge of the specific items covered by each Section does such individual have? Why would it be preferable to have each such person testify instead of the specific individual(s) who prepared each specific section of the CAT Report?

5. Is it correct that the CAT inspectors did not attempt to evaluate whether or not the items they inspected had been designed in accordance with:
  - (a) applicable engineering principles?
  - (b) NRC regulations and guidelines?
  - (c) Applicants' FSAR commitments?
6. Did the NRC CAT inspectors look at technical and engineering aspects of the areas which they inspected and reviewed (in general)?

Please address specifically the last paragraph of page III-9, which states: "...although extensive major technical problems were not identified in the pipe support/restraint hardware, prompt action is required to address the above program concerns." Specifically, how much of an effort did the CAT inspectors make to identify such major technical problems? Please give specific details.

7. If the answer to any portion of 5. preceding is no, please supply details of how it is incorrect.
8. What is the status of the items referenced in Appendix B of the CAT Report: i.e., the items which have been referred to NRC Region IV as potential enforcement findings?
9. If the disposition of the items referenced in 8. preceding has not yet been decided, when is it expected that a decision will be made

9. (continued):

by the NRC Region IV office in this regard?

10. The CAT Report states (page IX-1, B.1.a, second paragraph): "These duties and responsibilities were implemented...The CPP Discipline Engineers were responsible..." (Emphases added.) Does this mean that this is no longer the case?
11. If the answer to 10. preceding is yes, in what manner has this changed?
12. With regard to the statement (page IX-2, third paragraph) "It was found, from the samples reviewed, that the licensee's program satisfies the Bulletin's requirements.":
- (a) Isn't it true that the final as-built loads from the pipe stress group had not yet been determined?
- (b) If the answer to (a) preceding is yes, how can the load on the anchor bolt be justified and accepted as being correct if the final as-built loads from the pipe stress group had not yet been determined?
13. Does the procedure detailed in (2), first paragraph, page IX-2 comply with ANSI N45-2.11 and other NRC requirements?
14. Who has the responsibility for the design of conduit supports at Comanche Peak?

Who is responsible for design changes?

15. Please answer Question 6 preceding specifically for the statement on page IX-3, first full paragraph, which states: "The design input, verification, and output...were reviewed. Stress levels, as defined in FSAR Section 3.8.3.3.3.1 and FSAR Section 3.8.4.3.3.1 were properly incorporated into the support designs reviewed."

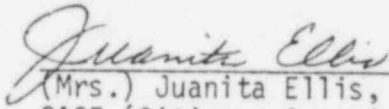
16. Regarding the statement "As a result of the procedures and records reviewed ..." (page IX-4, first full paragraph), what specific procedures and records is the CAT inspector referring to?
17. Regarding the statement "Procedures for the DCVG in some cases..." (page IX-5, fourth full paragraph), what specific procedures is the CAT inspector referring to?
18. With regard to the statement "Unsatisfactory conditions discovered during the verification process..." (page IX-5, fifth full paragraph), what specific unsatisfactory conditions is the CAT inspector referring to (give as much detail as possible)?
19. Regarding the statement "It appeared from this review that the DCVG did not include in their review electrical systems 'turned over' for test or electrical systems which have been energized." (page IX-5, last paragraph), what information, documents, statements, etc., gave this appearance? Please be as specific as possible.
20. Regarding the last paragraph of page IX-5, is this a violation of any NRC procedures, guidelines, requirements, etc., or of Applicants' procedures or FSAR?
21. If the answer to 20. preceding is yes, what specific documents have been violated?
22. Regarding the statements "Class V hangers are 'vendor certified' only when a stress problem becomes evident in the performance of the stress analysis. Otherwise, Class V hangers receive a review equivalent to the original design and incorporation of the latest change to the design." (page IX-7, fourth paragraph), what justification did the Applicants give for this practice?

23. With further reference to 22. preceding, is this practice acceptable to the NRC Staff?
24. If the answer to 23. preceding is no, in what way is it unacceptable and what should Applicants do to correct it?

Is the NRC Staff requiring the Applicants to do anything to correct it? If so, what and when?

As the Board Chairman suggested in the conference call 4/25/83, we are sending this Fourth Set to NRC Staff 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,

  
\_\_\_\_\_  
(Mrs.) Juanita Ellis, President  
CASE (Citizens Association for Sound Energy)  
1426 S. Polk  
Dallas, Texas 75224  
214/946-9446