



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
CAROLINA POWER & LIGHT COMPANY)	Docket No. 50-261-OLA
)	
(H.B. Robinson Steam Electric)	August 1, 1983
Plant, Unit 2)	

THE HARTSVILLE GROUP
SECOND SET OF INTERROGATORIES AND REQUESTS TO PRODUCE
OF NRC STAFF

Pursuant to 10 CFR Sections 2.720(h)(2)(ii) and 2.744, The Hartsville Group (Intervenor) hereby serves its Second Set of Interrogatories and Requests to Produce upon the NRC Staff in the above-captioned proceeding. These Interrogatories and Requests to Produce involve The Hartsville Group's Contentions 1(a), 1(b), 3, and 8..

Each interrogatory shall be answered fully in writing, under oath or affirmation, and include all pertinent information known to the NRC Staff including its officers, employees, agents, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of the Staff, including its officers, employees, agents, advisors or counsel. In answering each interrogatory and responding to each request, please recite the

interrogatory or request preceding each answer or response. Also, identify the person providing each answer or response, including but not limited to his or her name, address, employer, current position, and a statement of professional qualifications.

These interrogatories and requests shall be continuing in nature. Thus, any time information is obtained which renders any previous response incorrect or indicates that a response was incorrect when made, the Applicant should supplement its previous response to the appropriate interrogatory or request to produce.

The term "document" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. We request that at a date or dates to be agreed upon, you make available for inspection and copying all documents subject to the requests set forth below.

REQUESTS FOR DOCUMENTS

Pursuant to 10 CFR Section 2.744, the Intervenor requests you to make available for inspection and copying, at a time and location to be designated, any and all documents of whatsoever description identified in the responses to the Intervenor's interrogatories below; including but not limited to:

(1) any written record of any oral communication between or among Applicant, its advisors, consultants, contractors, agents, attorneys, and/or any other persons, including but not limited to the NRC Staff, the Intervenor, and their advisors, consultants, contractors, agents, attorneys and/ or any other persons; and

(2) any documents, correspondence, letters, memoranda, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to work papers, prior drafts and notes of meetings.

If you maintain that some documents should not be made available for inspection, you should specify the documents and explain why such are not being made available. This requirement extends to any such document, described above, in the possession of the Applicant, their advisors, consultants, agents or attorneys.

INTERROGATORIES

Pursuant to 10 CFR Section 2.720(h)(2)(ii), the Intervenor requests the Staff by and through their attorneys to answer separately and fully in writing, under oath or affirmation, by persons having knowledge of the information requested, the following interrogatories.

A. GENERAL INTERROGATORIES

G-1. With respect to all persons who participated in answering the Intervenor's First Set of Interrogatories and Requests to Produce and all who participate in answering the interrogatories and requests to produce herein, please identify his or her current employer, position, and title and provide a statement of professional qualifications.

B. INTERROGATORIES RELATING TO HARTSVILLE CONTENTION 1 (PARTS A & B)

1-1. Please describe in detail any and all enforcement severity level classification systems or schemes which have been employed by the NRC Staff or its predecessor agencies since the original construction permit was issued to Carolina Power & Light Company for the construction of Robinson 2.

1-2. Has CP & L been found to be in violation of NRC

operating or administrative rules, regulations or procedures during the use of any of those classificatory schemes such that the violation was found to be at the most severe or second most severe level of violation?

1-3. If the answer to Interrogatory 1-2 is affirmative, please describe in detail each such incident.

1-4. What are the documentary bases for your responses to Interrogatories 1-1 through 1-3?

1-5. Explain the "case law" approach referred to in your response to Hartsville Interrogatory 1-53.

1-6. What have been the results of the investigation referenced in your response to Hartsville Interrogatory 54?

C. INTERROGATORIES RELATING TO
HARTSVILLE CONTENTION 3

3-1. Does D. Basdekas of the NRC Staff have a differing professional opinion regarding PTS, embrittlement, neutron fluence levels, or neutron flux reduction measures?

3-2. If the answer to Interrogatory 3-1 is affirmative, please describe those differences in detail.

3-3. What are the bases of your responses to Interrogatories 3-1 and 3-2?

3-4. How many Westinghouse Model 44 steam generators have experienced significant degradation of tubes resulting in tube leaks?

3-5. Identify each reactor employing Westinghouse Model 44 steam generators which has experienced tube leaks.

3-6. What data do you possess on the frequency and severity of tube leaks in reactors equipped with Westinghouse Model 44 steam generators?

3-7. What are the bases for your responses to Interrogatories 3-4 through 3-7?

3-8. How many tube ruptures have occurred at reactors employing Westinghouse Model 44 steam generators?

3-9. At which reactors employing Westinghouse Model 44 steam generators, have:

- a) steam generator tubes been plugged;
- b) steam generator tubes been sleeved; or,
- c) lower steam generator assemblies been replaced?

3-10. Identify any additional reactors employing Westinghouse Model 44 steam generators where the operators or owners anticipate:

- a) plugging steam generator tubes;
- b) sleeving steam generator tubes; or,
- c) replacing the lower steam generator assemblies.

3-11. What are the bases for your responses to Interrogatories 3-8 through 3-10?

3-12. How many leaks have been experienced in the steam generator tubes in Robinson 2?

3-13. For each instance of leaking steam generator tubes at Robinson 2, identify the date of the occurrence, the leakage rate, and the cause of the leakage.

3-14. Is Staff aware of any litigation in which

supplier Westinghouse is involved in which it has been alleged that there have been defects or deficiencies in the design, manufacture or operation of Westinghouse steam generators?

3-15. If the answer to Interrogatory 3-14 is affirmative, identify each such litigation, the parties involved, and the allegations made.

3-16. What are the bases for your responses to Interrogatories 3-14 and 3-15? Identify all documents, testimony or oral statements by any person upon which you rely in support of your position.

3-17. How many tubes are plugged in each of the steam generators at Robinson 2?

3-18. What is the safety margin for tube plugging at Robinson 2?

3-19. Describe the "certain confirmatory information" referenced at your answer to Hartsville Interrogatory 3-47.

3-20. Has that information been provided?

3-21. Generic Issues Branch aside, do any other NRC Staff members have differing professional opinions relating to tube degradation in Westinghouse Model 44 steam generators?

3-22. If the answer to Interrogatory 3-21 is affirmative, please identify all such differing professional opinions and provide the name, address and telephone number of the Staff member(s) involved.

D. INTERROGATORIES RELATING TO
HARTSVILLE CONTENTION 8

8-1. Would the Staff's answer to each Interrogatory propounded by the Intervenor in its First Set of Interrogatories and Requests to Produce be the same if answered today?

8-2. If the answer to Interrogatory 8-1 is negative, please identify each such interrogatory to which the answer would not be the same and provide the answer which would be given today.

8-3. Recent research on the Charleston earthquake seems to be leading to the conclusion that the Charleston earthquake should be the design basis earthquake for eastern reactors; is this not the Staff's position?

8-4. Does the Staff maintain that because the FSAR was written many years ago, that the FSAR description of site seismicity is that which would apply to any new structures at the site?

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