

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)
DUKE POWER COMPANY, et al.)
(Catawba Nuclear Station,)
Units 1 and 2))

Docket Nos. 50-413
50-414

OFFICE OF SECRETARY
DOCKETING & SERVICE

APPLICANTS' SUPPLEMENTAL RESPONSES TO
PALMETTO ALLIANCE'S INTERROGATORIES AND REQUESTS TO
PRODUCE RELATING TO CONTENTION 6

Pursuant to 10 CFR §2.740(e), Applicants supplement their responses to Palmetto Alliance's Interrogatories and Request to produce as follows:

Palmetto Alliance First Set of Interrogatories and
Requests to Produce (April 21, 1982)

GENERAL INTERROGATORIES

2. Please identify each and every person whom you are considering to call as a witness at the hearing in this matter on this contention, and with respect to each such person, please:
 - a. State the substance of the facts and opinions to which the witness is expected to testify;
 - b. Give a summary of the grounds for each opinion; and
 - c. Describe the witness' educational and professional background.

Lewis E. Zwissler

Applicants may offer the testimony of Lewis E. Zwissler of Management Analysis Company as an expert witness in the area of quality assurance. Mr. Zwissler will testify about his review of the Welding Inspector Task Force investigation and will offer testimony on his opinions of the Task Force methodology, findings, and recommendations. The grounds for Mr. Zwissler's testimony and a description of his educational and professional background are set forth in his Reports to Duke Power Company, which were provided to Palmetto Alliance during discovery on this contention.

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W. H. Owen

Applicants may offer the testimony of Mr. W. H. Owen. Mr. Owen is an Executive Vice-President with Duke Power Company and is responsible for the company's Construction, Design Engineering, and Quality Assurance Departments. Mr. Owen will testify about the construction and design of the Catawba Nuclear Station, the pay reclassification and resulting recourses of welding inspectors at Catawba, and the task force investigations of the concerns expressed by welding inspectors. The substance of the facts and opinions to which Mr. Owen is expected to testify and a description of his educational and professional background are set forth in the transcript of his deposition taken by Palmetto Alliance.

J. R. Wells

Applicants may offer the testimony of Mr. J. R. Wells. Mr. Wells is the former Quality Assurance Manager for Duke Power Company, and is expected to testify about the establishment and organization of the Quality Assurance Department and the pay reclassification and resulting recourse of welding inspectors at Catawba. The substance of the facts and opinions to which Mr. Wells is expected to testify and a description of his educational and professional background are set forth in the transcript of his deposition taken by Palmetto Alliance.

G. W. Grier

Applicants may offer the testimony of Mr. G. W. Grier. Mr. Grier is the Corporate Quality Assurance Manager for Duke Power Company and is expected to testify about the Quality Assurance Program, the pay reclassification and resulting pay recourse of welding inspectors at Catawba, the task force investigations of the concerns expressed by welding inspectors, implementation

of the recommendations made by the various task forces which investigated the concerns expressed by welding inspectors, and the Quality Assurance management response to the concerns expressed by welding inspectors. The substance of the facts and opinions to which Mr. Grier is expected to testify and a description of his educational and professional background are set forth in the transcript of his deposition taken by Palmetto Alliance.

B. Gail Addis

Applicants may offer the testimony of Ms. B. Gail Addis. Ms. Addis is expected to testify concerning her role in the pay recourse processed by welding inspectors at Catawba. The substance of the facts and opinions to which Ms. Addis is expected to testify and a description of her educational and professional background are set forth in the transcript of her deposition taken by Palmetto Alliance.

T. C. McMeekin

Applicants may offer the testimony of Mr. T. C. McMeekin. Mr. McMeekin was a member of the initial task force appointed to investigate the concerns expressed by welding inspectors at Catawba. Mr. McMeekin will testify concerning the investigations of his task force, including their findings and recommendations. The substance of the facts and opinions to which Mr. McMeekin is expected to testify are set forth in the Report of his task force which has been provided to Palmetto Alliance during discovery. Mr. McMeekin has a Bachelor of Science degree in electrical engineering from Pennsylvania State University and is a registered professional engineer. He has more than eighteen years of experience in nuclear operations and design, and is presently involved in the control and instrumentation design section of the Duke Power Company Design Engineering Department.

A. Parks Cobb

Applicants may offer the testimony of Mr. A. Parks Cobb. Mr. Cobb was the Chairman of the Technical Task Force appointed to investigate the technical concerns expressed by welding inspectors at Catawba. Mr. Cobb will testify concerning the work of the Technical Task Force, their findings, conclusions, and recommendations. The substance of the facts and opinions to which Mr. Cobb is expected to testify are set forth in the Reports issued by the Technical Task Force, which have been provided to Palmetto Alliance during discovery. Mr. Cobb is a mechanical engineer with almost twenty years experience. A summary of Mr. Cobb's educational and professional experience, as well as a similar summary for the other members of the Technical Task Force, is contained in the Report issued by Mr. Lewis E. Zwissler of the Management Analysis Company, which has been provided to Palmetto Alliance during discovery.

C. N. Alexander

Applicants may offer the testimony of Mr. C. N. Alexander. Mr. Alexander was the Chairman of the Non Technical Task Force appointed to investigate the non technical concerns of the welding inspectors at Catawba. Mr. Alexander will testify concerning his review of the concerns, and the findings and recommendations made by his task force, as well as implementation of those recommendations. The substance of the facts and opinions to which Mr. Alexander is expected to testify are contained in his Report and correspondence with Duke Power Company management, which have been made available to Palmetto Alliance during discovery. In addition, this information concerning the substance of the facts Mr. Alexander will testify to, as well as a description of his educational and professional background, are set forth in the transcript of his deposition taken by Palmetto Alliance.

L. R. Davison and R. A. Morgan

Applicants may offer the testimony of Mr. L. R. Davison and Mr. R. A. Morgan. Mr. Davison is presently QA Manager of Projects for Duke Power Company. Mr. Morgan is presently the Senior Quality Assurance Engineer at the Catawba site. Both Mr. Davison and Mr. Morgan are expected to testify concerning the Quality Assurance Program at Catawba, the pay reclassification and the resulting recourse of welding inspectors, the concerns expressed by welding inspectors, the task force investigations of those concerns, and implementation of the recommendations of the task forces at Catawba, including procedure revisions and other changes in the QA Program. The substance of the facts and opinions to which Mr. Davison and Mr. Morgan are expected to testify, as well as a description of their educational and professional backgrounds are set forth in the transcripts of their respective depositions taken by Palmetto Alliance.

J. C. Shropshire, A. E. Allum, and C. R. Baldwin

Applicants may offer the testimony of Mr. J. C. Shropshire, Mr. A. E. Allum, and Mr. C. R. Baldwin. Mr. Shropshire is an engineer in the Quality Assurance Program at Catawba, and is responsible for QA engineering in the mechanical, welding, and non destructive examination areas. Mr. Allum is a Technical Supervisor in Quality Assurance at Catawba and has had responsibility for non destructive examination, welding, and mechanical inspection. Mr. Baldwin is a Technical Supervisor in Quality Assurance at Catawba, and has been responsible for non destructive examination and welding inspection. Each of these witnesses will testify concerning the Quality Assurance Program at Catawba, the concerns expressed by the welding inspectors, and the implementation of the recommendations of the task forces. The substance of the facts and opinions to which each will testify, as well as a

description of their educational and professional backgrounds are set forth in the transcripts of their respective depositions taken by Palmetto Alliance.

Welding Inspectors

Applicants may call as witnesses welding inspectors and supervisors who worked at Catawba at the time of the pay reclassification and resulting pay recourse, and at the time of the expression of technical and non technical concerns by welding inspectors. A definite determination as to which inspectors and supervisors will be called as witnesses at the hearing has not been made, and in all likelihood will not be made until close to the time for submission of written testimony as set by the Board. When such determination has been made, this Interrogatory Response will be promptly updated.

SPECIFIC INTERROGATORIES

During the course of discovery, Applicants made various documents available to Palmetto Alliance for inspection and copying at the offices of Duke Power Company in Charlotte, North Carolina. Applicants made these documents available in a room in the Legal Department during the entire course of discovery as an accommodation to the intervenors, and at the close of discovery, Applicants advised Palmetto Alliance that they would no longer maintain a document room for the inspection and copying of these discovery documents. Palmetto has requested that the Board require that these discovery documents be made available in a similar manner for their continued inspection and review.

The Board has indicated that the parties should attempt to resolve this matter without the necessity of a Board ruling. Applicants indicated earlier to Palmetto Alliance that, although the document room would be closed at

Applicants' offices, Applicants would continue to copy and mail to Palmetto Alliance any documents identified and requested by Palmetto Alliance which were made available during discovery under the same terms and conditions as existed while discovery remained open. Applicants remain willing to provide to Palmetto Alliance any documents that were made available during discovery as long as Palmetto specifically identifies the documents, and pays five cents per page for copying as previously agreed between Applicants and Palmetto Alliance.

Documents identified in this supplemental response to intervenors discovery requests will be provided to Palmetto Alliance if requested.

Interrogatory 3

In response to this interrogatory, Applicants made available the Duke Power Company Topical Report. Duke Power Company has prepared a proposed amendment to the Topical Report which is currently being submitted to NRC for approval. This proposed amendment is available if requested by Palmetto Alliance.

Interrogatories 12 and 13

In response to these interrogatories, Applicants made available for inspection and copying Significant Deficiency Reports which list deficiencies as defined in 10 CFR §50-55(e). Applicants supplement their earlier response by adding report No. 83-09 to the reports previously identified. In accordance with the practice which Applicants have followed since November of 1981, Palmetto Alliance was mailed a copy of this report. (See letter dated September 2, 1983 from H. B. Tucker to James P. O'Reilly of the NRC.)

Interrogatory 14

This interrogatory sought identification of audits conducted pursuant to 10 CFR Part 50, Appendix B, Criteria XVIII which reflected deficiencies. In response to this interrogatory, Applicants identified and made available for inspection and copying all departmental audits pursuant to 10 CFR Part 50 Appendix B, Criterion XVIII of design and construction at Catawba which reflected deficiencies. Such list was current through December 1982. This list of audits is supplemented by those listed below, which will be provided to Palmetto Alliance if requested.

* 1982 Corporate Audit	
* SP-81-13 (CN)	SP-82-15 (CN)
NP-83-1 (CN)	* CD-82-10 (CN)
* CD-82-13 (CN)	* CD-82-15 (CN)
** CD-82-17 (CN)	** CD-82-18 (CN)
** CD-83-1 (CN)	** CD-83-3 (CN)
** CD-83-7 (CN)	** CD-83-9 (CN)
* DE-82-5 (CE)	* DE-82-6 (ED)
* DE-82-7 (MD)	* DE-82-9 (PM)
DE-83-1 (PM)	** DE-83-2 (GS)
** DE-83-4 (ED)	** DE-83-5 (MD)

*Indicates audits which were identified in Applicants' earlier Responses as open and are now closed.

**Indicates audits which are still open.

Interrogatory 21

This interrogatory requested identification of NRC Regulatory staff inspection reports and files regarding Catawba. In response to this interrogatory, Applicants identified and made available for inspection and copying the NRC Inspection Reports for Catawba. Applicants supplement their earlier response to include the reports identified below. This listing includes all 1983 reports. The NRC Inspection Reports for 1983 which were available before the close of discovery were placed in Applicants' document room prior to the close of discovery.

413-414/83-01	413/83-13
413-414/83-02	413/83-14
	414/83-13
413-414/83-03	413/83-15
413-414/83-04	414/83-14
413-414/83-05	413/83-16
	414/83-15
413-414/83-06	413/83-17
413-414/83-07	414/83-16
413-414/83-08	413/83-18
413-414/83-09	413/83-19
	414/83-17
413-414/83-10	413/83-20
413-414/83-11	414/83-18
413-414/83-12	

Interrogatories 23 and 25

These interrogatories requested information regarding disputes and disagreements between quality control inspectors and their supervisors or Duke Power Company management, and complaints by workers known by Duke Power Company regarding substandard workmanship. During the course of witness preparation, and while reviewing materials to be used in updating prior responses to interrogatories, Applicants determined that documents reflecting a recourse action not completed until August 16, 1983, and other information relating to James S. Henson, an employee of the Construction Department, had not previously been made available. Because Palmetto Alliance had previously requested copies of all such documents covered by these interrogatories relating to other employees, Applicants are forwarding copies of the Henson documents to Palmetto Alliance with this Supplemental Response. Applicants would ask Palmetto Alliance to treat the medical information contained in the Henson recourse file as sensitive information, and not to disclose such information without first discussing it with Applicants.

An investigation was undertaken in an attempt to determine why the Henson documents had not been provided earlier. As a result, Applicants obtained the following documents, located in the files of Construction Employee Relations:

- A. Exit Interview Report of Francis M. Buckley, dated April 25, 1983.
- B. Exit Interview Report of John Mallen, dated June 27, 1983.
- C. Exit Interview Report of Raymond Austall, dated June 7, 1983.

These documents are also being forwarded to Palmetto Alliance. These documents do not provide additional substantive information beyond that already made available to Palmetto Alliance during discovery.

During the depositions of certain Duke Power Quality Assurance employees, documents related to the Recourses of John Rockholt and Eddie Feemster were provided to Palmetto Alliance. Documents generated subsequent to the depositions are included with these Supplemental Responses. In addition, the Recourse documents of Tony Bagwell, dated August 26, 1983 are included with this Supplemental Response.

Palmetto Alliance Follow-Up Interrogatories (March 17, 1983)

Interrogatory 6

This interrogatory requested the identity of Duke Power Company employees principally responsible for the development, management, and implementation of the company's Quality Assurance Program at the Catawba Nuclear Station. In its March 25 Responses, Applicants provided a chart setting forth the positions held by various employees. During the course of depositions, certain errors in the chart were identified. Applicants are providing a corrected chart with these Supplemental Responses.

Interrogatory 9

This interrogatory requested background information relating to the Welding Inspector Task Force investigation. During the course of preparation of the testimony of the Task Force Chairman, Applicants determined that the documents described below were not placed in the document room during discovery:

A. Inspector Feedback Notes

Section 10.0 of the Technical Task Force Report describes the inspector feedback activities conducted by the Task Force. The Task Force members reviewed their findings, conclusions and recommendations with the inspectors. Although the results of these interviews are included in the Report, the handwritten notes of the Task Force members were not included in the document room. These notes will be provided to Palmetto Alliance if requested.

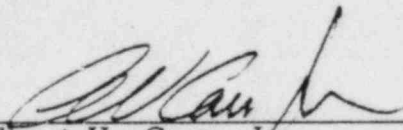
B. Other Notes And Drafts

The task Force members took notes during the course of their work, and had other personnel perform work for them ranging from clerical duties to complex analyses, including interviews with the welding inspectors. Although the substance of this work was included in the Task Force Report, the notes and drafts of this work was not included in the document room. Applicants will provide these notes to Palmetto Alliance if requested.

During the deposition of R. A. Morgan (p. 90-93), he described a process known as "stickman". This process, though in effect prior to the welding inspector concerns, was modified during the implementation of the Task Force recommendations. If requested by Palmetto Alliance, Applicants will make available the documents relating to the stickman process, which consist

primarily of technical questions from inspectors and responses from the appropriate technical support area.

Finally, the items of correspondence pertaining to Finding 9.3.1 of the Management Analysis Company Report were not in the Duke Power document room. This correspondence is a November 8, 1982 memorandum from W. O. Henry to W. H. Bradley and a September 10, 1982 memorandum from C. N. Alexander to W. H. Bradley. These documents are being provided to Palmetto Alliance with these Supplemental Responses.



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September 8, 1983

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD ⁸³ SEP 12 12:32

In the Matter of)
DUKE POWER COMPANY, et al.)
(Catawba Nuclear Station,)
Units 1 and 2))

Docket Nos. 50-413
50-414

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify that copies of "Applicants' Supplemental Responses To Palmetto Alliance's Interrogatories And Requests To Produce Relating To Contention 6" in the above-captioned matter have been served upon the following by deposit in the United States mail this 8th day of September, 1983.

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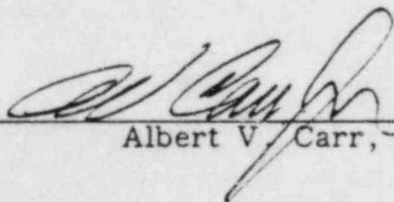
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*Hand delivered on September 8, 1983
with documents enclosed.

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