

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
DUKE POWER COMPANY, <u>et al.</u>	)	Docket Nos. 50-413
	)	50-414
(Catawba Nuclear Station,	)	
Units 1 and 2)	)	

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.

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

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

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

Docket Nos. 50-413  
50-414

CERTIFICATE OF SERVICE

I hereby certify that copies of Applicants' "Designation of Witnesses" in the above-captioned matter have been served upon the following by deposit in the United States mail this 19th day of September, 1983.

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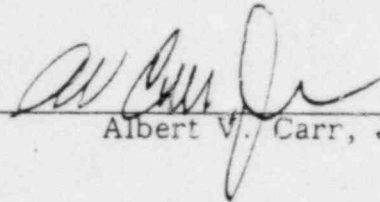
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Albert V. Carr, Jr.