

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of)

METROPOLITAN EDISON COMPANY, ET AL.)

(Three Mile Island Nuclear
Generating Station, Unit 1))

Docket 50-289
(Steam Generator Repair)

LEE ET AL INTERROGATORIES OF NRC STAFF (SET 1)

1. Provide list of all known cases of IGSCC in tubes of OTSGs in commercial nuclear facilities in the United States, providing for each case :

- a. Name of facility
- b. Date facility first operated over 10% power
- c. Owner of facility
- d. Description of event bringing case to the attention of the NRC
- e. Date event was reported
- f. The extent of IGA on inner tube surfaces
- g. The extent of IGSCC
- h. Extent of crack propagation
- i. Tube composition, including ranges, for all tubes
- j. Heat treatment history of OTSG tubes
- k. Analysis of water passing thru tubes prior to
- l. And at time of failure
 - Actual data where available
 - Estimates where data is not available
- m. Full description of each facilities' response, including all facility owner generated reports
- n. NRC assessment of cause
- o. NRC approved response to incident
- p. NRC approved repair program

2. Describe all mechanisms on which Staff or its consultants rely to define:

- a. Initiation of IGA in OTSG tubes.
- b. Initiation and propagation of IGA in OTSG tubes,
- c. Environments which will inhibit IGA, IGSCC and crack propagation.

Where interrogatories reference Report, this is the Report of the Third Party Review of Three Mile Island, Unit 1, Steam Generator Repair, Supplement 1, May 16, 1983.

3. Provide with specificity the participation of each member of the Third Party Review Committee.
4. Provide the April 7, 1983 letter from GPU Nuclear in response to the Review Group's report and the additional documents for the Review Group used referred to at page 1, Report, "Background". (This letter was not included in Appendix A with its Attachment 1.)
5. Provide the April 4, 1983 letter of GPU Nuclear which distributed additional documents for the Review Group's use and those documents asserted to be provided (see page 1, Report, "Background") and not provided.
6. Is the Interim Report of Third Party Review of Three Mile Island, Unit 1, Steam Generator Repair, marked "Appendix A" to be considered Attachment 1 of Appendix A referred to at "Background", page 1 of Report? If not, provide Attachment 1 to Appendix A.
7. We find no GPU Nuclear April 4, 1983 letter to be provided as "Appendix B". Provide this letter referred to at page 1, "Background", Report.
8. Provide complete transcript for April 12 and 13, 1983 meetings of GPU Nuclear with Review Group.
9. Were all Review Group members present during the April 12, and 13, 1983 meetings referred to at (6)?
10. a. Were Licensee management officials and/or NRC Staff members present during the final review committee deliberations which followed from the April 12 and 13, 1983 meetings?
b. When and where were these final deliberations conducted?

- c. Describe any contacts between the Staff and the Review Group subsequent to the April 12 and 13, 1983 meetings.
 - d. Describe the preparation of the Report, including the Staff's part and identity of Staff members who participated, if any.
 - e. Was the Report approved by each Review Group member prior to its finalization?
 - f. Provide any comments, either verbal or written, which may have resulted because of a member's review of the Report.
11. What Review Group member(s) does NRC Staff plan to present to support the Report?
12. Identify GPU Nuclear staff present at April 12 and 13, 1983 meetings with Review Group. Identify NRC Staff representative.
13. Provide "revised documents" alleged to be identified in Appendix A and B referred to at "Conclusion" of Report.
14. Provide "revised documents" alleged to be identified in Staff's Safety Evaluation Reports 008 and 010, and referred to at "Conclusion" of Report.
15. Provide "The GPU Nuclear responses" introduced at "Comments and Recommendations" of Report and not provided in Appendix A as asserted.
16. Describe any disagreement between any Review Group member with the Report.
17. Provide plant-related data which supports the conclusion (page 8, para. 1) that "the growth of flaws due to mechanical effects is slow (i.e., growth to a critical size takes many operating cycles) and that eddy current is capable of detecting flaws before they approach critical size."
18. Provide plant-related data which challenges the conclusion cited in (15).

19. Provide any information, including documents, notes or verbal communications, known to all Staff members who would have such information, that challenges the conclusion cited (15).

Pursuant to 10 C.F.R. 2.740b and 2.741, the joint intervenors, Lee et al., hereby request that the NRC Staff answer separately and fully in writing, and under oath, each of the above interrogatories. These interrogatories are intended to be continuing in nature, and the answers should be promptly supplemented or amended as appropriate, pursuant to 10 C.F.R. 2.740(e), should the NRC Staff or any one acting on its behalf obtain any new or differing information responsive to these interrogatories. The NRC Staff is to respond according to the same standards described in NRC Staff's First Set of Interrogatories and First Document Production Request to Joint Intervenors Norman Aamodt and Jane Lee, December 23, 1983 at pages 2,3,5 and 6 and where supplementary on those standards described in Licensee's First Set of Interrogatories and Request for Production of Documents to Joint Intervenors, December 15, 1983 at pages 2,3,4,15 and 16.

Respectfully submitted,

Jane Lee

Jane Lee

Norman O. Aamodt

Norman O. Aamodt

January 16, 1984