

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
Philadelphia Electric Company) Docket Nos. 50-352
) 50-353
(Limerick Generating Station,)
Units 1 and 2))

APPLICANT'S FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS TO INTERVENOR
AIR AND WATER POLLUTION PATROL ON CONTENTION VI-1

Pursuant to the Rules of Practice of the Nuclear Regulatory Commission ("NRC"), 10 C.F.R. §2.740(b), and the Atomic Safety and Licensing Board's Memorandum and Order (October 28, 1983), Philadelphia Electric Company ("Applicant") hereby propounds the following interrogatories to Air and Water Pollution Patrol ("AWPP") to be answered fully in writing, under oath, in accordance with the definitions and instructions below.

Additionally, pursuant to 10 C.F.R. §2.741, Applicant requests that intervenors produce for inspection and copying (or provide copies of) those documents designated by intervenors in their respective answers below.

Definitions and Instructions

1. For each interrogatory, please state the full name, work address, and title or position of each person providing information for the answer to the interrogatory.

2. The following definitions shall apply:

- a. "Intervenor" shall refer to AWPP or any officer, member, employee or consultant thereof.
- b. "Document" shall mean any written, printed, typed or other graphic matter of any kind or nature, and all mechanical and electronic sound recordings or transcripts thereof, in the possession, custody, or control of intervenor, or its officials, employees, or agents; it shall also mean all copies or drafts of documents by whatsoever means made.
- c. "Date" shall mean the exact day, month and year, if ascertainable, or, if not ascertainable, the best approximation (including the event's relationship to other events in the relevant context of the interrogatory).
- d. "NRC" or "Commission" shall mean either the Atomic Energy Commission or the Nuclear Regulatory Commission, as appropriate, including its regulatory staff and adjudicatory boards, as indicated by the context of the interrogatory.
- e. "Specify", when referring to a proceeding before the Nuclear Regulatory Commission, means that the answer shall set forth the proceeding, applicant, docket number,

relevant date, and any other descriptive information appropriate to the request.

- f. "Specify" or "identify", when referring to an individual, corporation, or other entity, means that the answer shall set forth the name, present or last known work address, and, if a corporation or other entity, its principle place of business or, if an individual, his or her title or titles and employer. Once an individual corporation or other entity has been thus identified in answer to an interrogatory, it shall be sufficient thereafter when identifying that individual, corporation or other entity to state merely his, her or its name.

3. These interrogatories request all knowledge and information in intervenor's possession and/or knowledge and information in the possession of intervenor's agents, representatives, consultants, and unless privileged, attorneys.

4. In each instance in which an interrogatory requests a statement of intervenor's assertion, contention, view or opinion, the answer shall also contain a full discussion of the factual basis for the assertion or opinion.

Interrogatories

1. State whether intervenor intends to present any expert witnesses on the subject matter at issue in

Contention VI-1, as restated by the Licensing Board in its Memorandum and Order dated October 28, 1983 (slip op. at 5). If so, identify each expert witness and state (a) his professional qualifications; (b) the subject matter on which the expert is expected to testify; (c) the substance of the facts and opinions to which the expert is expected to testify; (d) the grounds for each opinion. Identify by court, agency or other body, each proceeding in which such individual rendered testimony on this subject.

2. State whether intervenor intends to present any factual witnesses on the subject matter at issue in Contention VI-1 as restated by the Licensing Board in its Memorandum and Order dated October 28, 1983 (slip op. at 5). If so, identify each such factual witness and further state (a) his professional qualifications; (b) the subject matter on which the witness is expected to testify; (c) the substance of the facts to which the witness is expected to testify. Identify by court, agency, or other body, each proceeding in which such individual rendered testimony on this subject(s).

3. Identify by title, author, publisher and date of issuance or publication, all documents that you rely upon as a basis for your contentions or that you intend to use (by way of reference or evidentiary proffer) in presenting your direct case or in cross-examining other witnesses on Contention VI-1 and all documents to which you intend to

refer in conducting cross-examination of other witnesses who may testify in connection with any such contention.

4. To the extent that your answer to any interrogatory is based upon one or more documents, (a) identify each such document on which your answer is based; (b) identify the specific information in such document upon which you rely; (c) explain how the information provides a basis for your answer.

5. To the extent that your answer is based upon any study, calculation, research or analysis, (a) describe the nature of the study, calculation, research or analysis and identify any documents which discuss or describe the study, calculation, research or analysis; (b) identify the person(s) or entity(ies) who performed the study, calculation, research or analysis; (c) describe in detail the information which was the subject of the study, calculation, research or analysis; (d) describe the results of such study, calculation, research or analysis; (e) explain how such study, calculation, research or analysis provides a basis for your answer.

6. To the extent that your answer is based upon conversations, consultations or correspondence or other communications with one or more individuals or entities, please identify each such individual or entity; (b) state the educational and professional background of each such individual, including occupation and institutional affiliations; (c) describe the nature of each communication,

including time and context, and describe the information received from each such individual or entity; (e) explain how such information provides a basis for your answer.

7. To the extent that intervenor possesses information or documents expressing facts or opinions which are relevant to Contention VI-1, but which do not support intervenor's position or which have not otherwise been fully provided in the answers thereto, please provide such information and documents.

8. Specify each system, component or part of the Limerick Generating Station as to which intervenor asserts that Applicant has failed to control performance of welding and inspection in accordance with quality control and quality assurance procedures and requirements (aside from that reported in NRC Inspection Report 50-353/76-06-01). For each such instance:

- a. Identify the system, component or part which is involved in such failure as precisely as possible, e.g., by physical location, weld number, radiograph, welder, drawing.
- b. Specify the precise procedure which Applicant failed to utilize or the precise requirement Applicant failed to meet and state the basis upon which intervenor contends that the procedure or requirement is applicable to Limerick.

- c. Describe the exact defect or deficiency which resulted.
- d. State the nondestructive tests conducted on the weld in question.
- e. Identify the individual or individuals involved in the faulty welding or inspection.
- f. Identify the manner in which the defect or deficiency was discovered.
- g. Identify the individual or individuals who discovered such defect or deficiency.
- h. Identify when and under what circumstances intervenor learned of such defect or deficiency.
- i. Identify the documentation related to the defect or deficiency and its correction known to intervenor.
- j. Specify whether such defect or deficiency has been dispositioned or corrected.
- k. If the defect has not been dispositioned or corrected, whether such action is planned or scheduled.
- l. Specify the manner in which the defect or deficiency has been dispositioned or corrected.
- m. Specify the reasons why intervenor believes the correction or disposition of the deficiency or defect fails to meet all

applicable requirements of the Philadelphia Electric Company, its contractors or the Nuclear Regulatory Commission.

Respectfully submitted,

CONNER & WETTERHAHN, P.C.

A handwritten signature in dark ink, appearing to read "Mark J. Wetterhahn", written in a cursive style.

Mark J. Wetterhahn
Counsel for the Applicant

December 7, 1983

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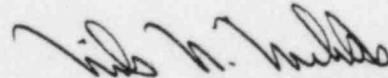
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NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance on behalf of the Applicants in the captioned matter. In accordance with §2.713, 10 C.F.R., Part 2, the following information is provided:

Name	-	Nils N. Nichols
Address	-	1747 Pennsylvania Avenue, N.W. Suite 1050 Washington, D.C. 20006
Telephone Number	-	202/833-3500
Admission	-	West Virginia Supreme Court of Appeals
Name of Party	-	Philadelphia Electric Company



Nils N. Nichols

Dated at Washington, D.C.
this 7th day of December, 1983.