

RELATED CORRESPONDENCE

April 30, 1984

DOCKETED  
USNRC

UNITED STATES OF AMERICA '84 MAY -1 A11:10  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
CAROLINA POWER AND LIGHT COMPANY	)	Docket Nos. 50-400 OL
and NORTH CAROLINA EASTERN	)	50-401 OL
MUNICIPAL POWER AGENCY	)	
	)	
(Shearon Harris Nuclear Power	)	
Plant, Units 1 and 2)	)	

APPLICANTS' RESPONSE TO  
WELLS EDDLEMAN'S INTERROGATORIES  
(CONTENTION 41)

INTERROGATORY NO. 41-X-1(a). For each Welder in Appendix B, please state:

(i) the type of welding experience(s), e.g. shop welder, pipe welder, construction welder, each has had, for how many years;

ANSWER: See Exhibit A hereto.

(ii) each employer with whom that welder had experience;

ANSWER: See Exhibit B hereto.

(iii) whether Daniel, CP&L or anyone else checked with (aa) any (bb) each (cc) a previous employer re that welder's experience, specifying who contacted which previous employer, naming each previous employer and which person, entity or organization was involved in making the contact re experience;

ANSWER: See Exhibit C hereto.

(iv) the welding techniques (oxyacetylene, stick or arc, MIG, TIG, etc.) each such welder had experience in;

ANSWER: Welder No. 38: DCC - ASME P-1 Pipe Welder, GTAW,

SMAW; M & C Manufacturing Co. - GTAW, GMAW, SMAW, Plasma; Bre-  
vet - Aluminum, stainless, carbon, GTAW, GMAW, SMAW; Truxmore -  
GMAW, GTAW; Capital Ironworks - SMAW.

No information of this type is contained in personnel  
files and welding engineering files at the Harris site ("em-  
ployment records") for the remainder of the welders listed in  
Appendix B.

(v) all welding positions each such welder qualified  
in w/each previous employer (if known);

ANSWER: Applicants do not know.

(vi) any problems the welder had with any previous  
employer or on any previous job, which you are aware of,  
including discipline or discharge for bad or defective welding  
or for any other cause (specify) (e.g. drug use, absenteeism,  
alcoholism, theft, conflict w/supervisor or other employee(s),  
etc.);

ANSWER: Applicants do not know; no information of this  
type is contained in the employment records of the welders  
listed in Exhibit B.

(vii) all job training or other welding training re-  
ceived while with previous employer(s);

ANSWER: Welder No. 80: Newport News Ship Building -  
Welding School - 8/29/77 through 9/5/78. Welder No. 101: DCC  
Welding School - Jenkinsville, S.C. - 5/15/79 through 7/26/79.

No information of this type is contained in the employment  
records for the remainder of welders listed in Appendix B.

(viii) all performance evaluations, transcripts or  
reports from welder training, etc. for present and past employ-  
ment, identifying all documents in your or Daniel's possession  
containing such information;

ANSWER: As to present employment, see Applicants' answer

to Interrogatory 41-7 (11/11/83). As to past employment, no information of this type is contained in employment records of welders listed in Appendix B.

(ix) all disciplinary action taken against each such employee at Harris;

(x) reason for each (aa) discharge -- give date (bb) layoff (give date) (cc) other termination of work, e.g. voluntary quitting of job -- give reason and date. Please state all reason(s) you know and identify all documents concerning each discharge, layoff, or other separation from work at Harris, for each such person.

ANSWER: (ix), (x)(aa) and (bb): See Applicants' answers to Interrogatories 41-4(s, t) and 41-20(187) and (188).

(cc): (1) Welder No. 33: voluntary terminations on 5/18/81 and 11/10/82; (2) Welder No. 80: voluntary termination on 3/25/82; (3) Welder No. 93: voluntary termination on 4/1/80; (4) Welder No. 101: voluntary termination on 11/4/82; (5) Welder No. 110: voluntary termination on 9/24/81; (6) Welder No. 120: voluntary termination on 8/2/82; (7) Welder No. 143: voluntary termination on 11/1/83.

Applicants object to providing the reasons for voluntary terminations as irrelevant to the subject matter of the contention.

(xi) identification of all documents concerning the employee's work record at Harris including discipline, job performance evaluations, any grievances filed by or against the welder, and any evaluation of performance in welding pipe hangers;

ANSWER: Welder Evaluation Reports (which are available for certain of the welders listed in Exhibit B) contain assessments of welder performance. (Welder Evaluation Reports are

not available for other welders as they were employed on site prior to implementation of the Welder Evaluation Report forms.)

Applicants object to producing "all documents concerning the employee's work record" as irrelevant to the subject matter of the contention.

(xii) which of these welders received retraining in pipe hanger welding or in welding or in blueprint reading (specify which) while at Harris, giving in detail the description, curriculum or outline of the training received, and stating any evaluation of that welder's performance in that training, and identifying all documents concerning retraining or training in the above-listed matters for each such welder;

ANSWER: See Applicants' answers to Interrogatories 41-7 and 41-1(1) and (m), Appendix B.

(xiii) all training such welder had previously received in blueprint reading prior to work at Harris, and all documents' identification for documents concerning such training;

ANSWER: Kenneth B. Carney: 9/79 - 10/80 - Blueprint reading, Southwestern Tech; no training documents available. No blueprint reading training noted in the files of any other welders listed in Appendix B.

(xiv) all training in blueprint reading received after beginning work at Harris, including the date(s), curriculum and reason(s) for this training and all documents related to it or to the welder's participation in it, particularly any evaluations of said welder's performance in such training;

ANSWER: See answer to Interrogatory 41-X-1(a)(xii) above.

(xv) any records on defective pipe hanger welds made by each such welder and the identification of any documents known to you which link each such welder with defective pipe hangers;

ANSWER: See Applicants' answer to Interrogatory 41-1(o) (11/11/83). Documentation containing this type of information

is included on the Seismic Weld Data Report in seismic pipe hanger packages. Applicants object to producing this information as burdensome due to the volume of reports requiring review (approximately 18,000 pipe hanger packages).

(xvi) identification of all documents concerning each such welder's assignment (aa) to (bb) away from, pipe hanger welding at Harris;

ANSWER: All initial welding assignments after hire are entered on Craft Requisition forms. The type of welding assignment is determined by previous experience and success on welding procedures during initial welding tests (i.e., pipe, plate, hangers). The welder employment records do not track an individual welder's day-to-day welding assignments. Applicants object to producing the Craft Requisition forms as burdensome as these forms are not maintained on an individual welder basis.

(xvii) any notes or documents whatsoever concerning this welder's pipe hanger welding performance, which you possess, please identify all such documents not already identified in response to the above;

ANSWER: See answer to Interrogatory 41-X-1(a)(xi) above.

(xviii) identification of, and identification of all documents, re any reports of defective pipe hangers made by such welder at any time;

ANSWER: None identified in the files on welders identified in Appendix B.

(xix) any documents re instruction in or familiarization with QA/QC procedure which were given to such welder or used in instructing or informing such welder; identify all such documents for each such welder;

ANSWER: Formal instruction on-site has been identified in

Applicants' answer to Interrogatory 41-1(m) "Post Employment Welding Training." Exclusive of classroom training, QA/QC familiarization is conducted by field supervision on the job in the form of verbal instruction.

(xx) any documents re any statements made or information given by (aa) CP&L (bb) Daniel (cc) anyone else known to you, to this welder, re (dd) defective pipe hanger welding at Harris (ee) blueprint reading problems in pipe hanger welding at Harris (ff) reporting, or not reporting, violations of NRC regulations re welding or pipe hangers (gg) reporting, or not reporting, violations of QA or QC or other applicable procedures re Harris pipe hangers or any such hanger(s) (hh) reporting, or not reporting, defective welds on Harris pipe hangers or any such hanger (jj) procedure for repairing defective pipe hangers or defective welds thereon (kk) procedure to follow when blueprint symbols for a pipe hanger are not clear to the welder (ll) procedure for welding pipe hangers at Harris (mm) speed or piecework requirements for welding pipe hangers at Harris (nn) pay rates or incentives re welding pipe hangers at Harris (oo) other information, procedures or plans, formal or informal, identifying each such, which relate to pipe hangers at Harris or inspection thereof.

ANSWER:

- (aa) None noted.
- (bb) None noted.
- (cc) None noted.
- (dd) None noted.
- (ee) See 41-5(b) (11/11/83).
- (ff) See answer to Interrogatory 41-X-1(f).
- (gg) See answer to Interrogatory 41-X-1(f).
- (hh) See answer to Interrogatory 41-X-1(f).
- (jj) MP-10 "Repair of Base Materials & Weldments."
- (kk) See 41-5(b) (11/11/83).



(ll) MP-08 "General Welding Procedure for Structural Steel (seismic, non-seismic) & Hangers."

(mm) No procedure for this information.

(nn) No exceptional pay rates or incentives at SHNPP for welding pipe hangers.

(oo) WP-110 - Installation of Seismic Pipe Hangers and Supports for Seismically Analyzed Pipe; WP-139 - Pipe Hanger Work Package Preparation; FCR-AS-4294; CQC-19 Weld Control; QCI-19.3 - Seismic Pipe Hanger Inspection Documentation System; NDEP-605 - Visual Examination of Seismic I, Structural and Hanger Welds (SHNPP).

INTERROGATORY NO. 41-X-1(b). For each welder in Appendix A, please provide or provide copies of as much of the above-requested information or documents showing it, as is readily available. Please identify all documents containing such information.

ANSWER: Applicants object to this interrogatory as burdensome. Applicants have provided the requested information in response to Interrogatory No. 41-X-1(a) as to the random sample of welders on which the Licensing Board has previously required detailed information to be provided. Provision of this information would require Applicants to perform a detailed review of several record files on each of the 147 welders identified in Exhibit A to Applicants' March 14, 1983 Supplemental Responses.

INTERROGATORY NO. 41-X-1(c). Please specifically identify all reason for each

(i) termination

(ii) discharge

(iii) layoff

(iv) other leaving of a pipe hanger welding job at Harris, for each welder listed in Appendix A.

ANSWER: See objection to Interrogatory No. 41-X-1(b).

INTERROGATORY NO. 41-X-1(d). Please specify all communications CP&L or Daniel has made with any welder identified in Appendix A, concerning

(i) contention 41

(ii) the Harris OL proceeding

(iii) the release of her/his name to Wells Eddleman

(iv) rights or responsibilities to report defects to NRC

(v) communication by the welder with Wells Eddleman and/or anyone working for or with him

(vi) communication with nuclear intervenors or anti-nuclear activists

(vii) revealing or not revealing information concerning pipe hanger welds and/or defects therein at Harris. Please identify all documents which concern any of the above matters or which contain information re any communication inquired about above.

ANSWER: See Applicants' answer to Interrogatory No. 41-20 (191), dated April 17, 1984.

INTERROGATORY NO. 41-X-1(e). For each welder listed in Appendix A, please state that welder's last known home telephone number.

ANSWER: Applicants object to this interrogatory as burdensome, irrelevant and improper follow-on discovery. Mr. Eddleman could have easily included this request in his initial interrogatory requesting information on welders, but chose not to do so. Providing this information now would require Applicants to re-review the personnel file on each Craft 66



employee. See objection to Interrogatory 41-X-1(b), supra. Further, Applicants note that much of the file information in its possession would be outdated and that Mr. Eddleman has access equal to that of Applicants to current telephone directories.

INTERROGATORY NO. 41-X-1(f). Please specify the instruction(s), if any, re

- (i) pipe hanger welding procedures
- (ii) blueprint reading for pipe hanger work
- (iii) blueprint reading generally
- (iv) defective welds
- (v) reporting of defects at Harris to QA/QC
- (vi) reporting of defects at Harris to NRC
- (vii) communicating re defects at Harris in pipe hanger to anyone other than CP&L, Daniel or NRC personnel
- (viii) not telling info about problems at Harris, esp. re pipe hangers, which (aa) any (bb) all (cc) any specific known welder or welders listed in Appendix A has received since beginning work at Harris, at any time, to your knowledge. Please identify the source of each such instruction(s) and identify all documents concerning each, including all notices put on display at Harris, and all internal communications or documents for communication to welders and/or other employees, re each such matter.

ANSWER: Welders at the Harris plant receive instructions on welding in the following manner:

1. When welders are hired, they are given a review of welding procedures (MP's) and are given a written test to verify their retention of this information. Re-tests are given if needed.

2. Once a welder is qualified, his field welding is monitored by Welding Engineering personnel who provide him with additional instruction(s) as needed.

3. Additional instruction(s) [training] is given to site welders through the Bi-monthly Welder Craft Training Classes which cover welding procedures on a rotating basis (two or three procedures for each training class) as well as covering any special concerns that arise.

In regard to defective welds, reporting defective welds to QA/QC and/or the NRC, and communicating in regard to defects at Harris in pipe hangers the following outlines procedural guidelines for handling defective pipe hanger welds: Welds that are visually rejected by QA/QC inspectors (thus making them defective welds) are documented as being defective on the Seismic Weld Data Report and are then repaired as in-process and the welds are inspected by QA/QC inspectors again. Defective welds detected by nondestructive examination (not by visual inspection) are repaired by use of a Repair SWDR generated by Welding Engineering.

INTERROGATORY 41-X-1(g). Please state which, if any welders listed in Appendix A have been disciplined for

(i) drug or alcohol problems

(ii) making defective pipe hangers

(iii) making defective pipe hanger welds at Harris. Please also identify all welders counseled or helped in any way re any of (i) thru (iii) above, specifying which and when. Please identify all documents concerning each incident or instance of (aa) discipline (bb) counseling (cc) help, and/or the nature of such discipline, counseling or help, for each welder.

ANSWER: See objection to Interrogatory No. 41-X-1(b).

INTERROGATORY NO. 41-X-1(h). Please state which of these welders identified in Appendix A

(i) is now welding

(ii) is now available to weld, pipe hangers at Harris.

ANSWER: The welders identified in Exhibit A were Craft 66 (Pipe) welders who were originally qualified as structural welders. Some of these welders have since been upgraded (qualified) to weld on pipe and would be considered as being available to weld on pipe hangers at Harris though their primary function is to weld pipe joints.

(i) Exhibit D is a list of those welders originally identified on Exhibit A who are now primarily welding pipe hangers at Harris, except as noted.

(ii) Exhibit E is a list of those welders originally identified on Exhibit A who are available for welding pipe hangers at Harris although, their primary function, as noted above, is to weld pipe joints.

INTERROGATORY NO. 41-X-1(j). Please identify all new hires in Craft 66 pipefitters etc. to date, (under the provisions of the Board's oral protective order of March 8, 1984. I will hold these names in the same confidence, i.e. as subject to that order) who are not listed in Appendix A. Please state which of them have welded pipe hangers or are to weld on them. Please answer all of the above interrogatories where possible, for each such welder.

ANSWER: Applicants object to this interrogatory as irrelevant to the scope of the contention, as the contention is historical in nature, being based on the inspection and reinspection of previously welded pipe hangers.

INTERROGATORY NO. 41-X-1(i). Please state what, if any QA or QC experience (specify what experience, when, with what organization(s)), any welder identified in Appendix A or in response to the above, has had, to your knowledge, and identify all documents you possess concerning such experience or the training in QA or QC such welder has received.

ANSWER: Of the welders listed in Appendix B, there is no record of previous QA/QC experience contained in their employment files. As to the welders identified in Exhibit A, see objection to Interrogatory 41-X-1(b).

Objections submitted by,

Deborah B. Bauser

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Counsel for Applicants

DATED: April 30, 1984

APR 30, 1984

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

CAROLINA POWER AND LIGHT COMPANY  
and NORTH CAROLINA EASTERN  
MUNICIPAL POWER AGENCY

(Bhearon Harris Nuclear Power  
Plant, Units 1 and 2)

Docket NO. 50-400 01.  
50-401 01

AFFIDAVIT OF ROLAND M. PARSONS

County of Wake

State of North Carolina

Figure 1

Roland M. Parsons, being duly sworn according to law, deposes and says that he is Project General Manager - Shearon Harris Nuclear Power Plant of Carolina Power & Light Company; that the answers to interrogatories on Edelman Contention 41 contained in "Applicants' Supplemental Response to Wells Edelman's General Interrogatories and Interrogatories on Contentions 9, 11, 41, 45, 116 and 132C(11) to Applicants Carolina Power & Light Company, et al. (Eight Set)" and in "Applicants' Response to Wells Edelman's Interrogatories (Contention 41)" are true and correct to the best of his information, knowledge

and belief, and that the sources of his information are officers, employees, agents and contractors of Carolina Power & Light Company.

*Roland M. Parsons*  
Roland M. Parsons

Subscribed and sworn to before me  
this 20<sup>th</sup> day of April, 1984.

*Robert E. Howard*  
Notary Public

My commission expires:

My Commission Expires 4/1/86

