

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

DOCKETED  
USNRC

'84 MAY 11 A10:50

In the Matter of:

COMMONWEALTH EDISON COMPANY )

(Byron Nuclear Station, )  
Units 1 and 2) )

Docket Nos. 50-454  
50-455

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
ENCL.

INTERVENORS' FIRST SET OF INTERROGATORIES  
TO EDISON

The definitions set forth in the accompanying Intervenor's First Request to Edison for the Production of Documents are incorporated herein by reference.

1. Please describe all meetings between Edison and/or its contractors and the NRC concerning the resolution or potential resolution of noncompliance 82-05-19 (including but not limited to the reinspection program), including in your answer:

- a. date and time;
- b. place;
- c. each person in attendance and his or her employer and position;
- d. topics discussed; and
- e. agreements reached, if any.

2. Please list each person to whom any drafts of reports and letters concerning the reinspection program were circulated and include in your answer the identification of the draft circulated (see Intervenor's First Request for Production of Documents No. 6).

3. For each Edison employee who participated in the development, implementation, and/or evaluation of the reinspection program, please state:

- a. name;
- b. employer and position;
- c. qualifications; and
- d. role in the process or program.

4. For each contractor employee, and each Edison consultant, who participated in the development, implementation, and/or evaluation of the reinspection program, please state:

- a. name;
- b. employer and position;
- c. qualifications; and
- d. role in the process or program.

5. Please state the present whereabouts, employer, job title, and description of job responsibilities of each witness who testified on Edison's behalf during the quality assurance phase of the Byron operating license hearings. If any of the requested information has changed since the date of the witness' testimony, please state each reason for the change.

6. In the February 13, 1984 Affidavit of Louis Owen Del-George, it is stated that a report of Edison's consultant John L. Hansel would be provided within 30 days. Please state:

- a. Whether it is still contemplated that Mr. Hansel will provide a report.

- b. The date by which it is projected the report will be available.
- c. If it is no longer planned to have Mr. Hansel do a report, each reason why.
- d. Each reason why the report was not completed within the 30 days projected in Mr. DelGeorge's affidavit.
- e. For each meeting between Mr. Hansel and Edison, and/or its contractors or other consultants,
  - (i) state the date, time and place of each meeting; and
  - (ii) list each person in attendance and their employment.

7. Please list all experts contacted by Edison concerning the possibility of providing expert opinion, consultation or reports on the reinspection program. For each person so listed, please provide:

- a. The name, address, employment and qualification of such person.
- b. Whether Edison retained him or her and
  - (i) if so, for what; and
  - (ii) if not, why not.

8. Please state whether Edison has received any drafts or final reports of any consultant in connection with the reinspection program and, if so:

- a. Identify the person(s) who wrote the draft or report.
- b. State his or her employer and position.
- c. Each person to whom the draft(s) and/or final report(s)

were circulated.

- d. Whether Edison plans to utilize such report(s) in the reopened hearing.

9. Please state each aspect, element or detail of the reinspection program that, in Edison's view, was left open by the NRC staff for subsequent acceptance or rejection. As to each aspect, element, or detail, please state:

- a. a description;
- b. each alternative resolution;
- c. whether it was ultimately resolved and, if so, how;
- d. Edison's position on how it should be or should have been resolved;
- e. who made the ultimate determination as to the resolution; and
- f. provide the names, positions, and employers of each person consulted in preparing this interrogatory response.

10. Please state, separately, for each type of equipment supplied by Systems Control Corporation ("SCC"):

- a. a description of the equipment;
- b. its intended function;
- c. the number of pieces of that type of equipment supplied at Byron;
- d. the number and description of deficiencies found in the equipment;

- e. how each deficiency was resolved; and
- f. the date(s) each piece was shipped from the SCC plant.

11. With respect to Hatfield Electric Corporation, please state:

- a. a description of each type of inspection performed by any Hatfield inspector;
- b. whether the inspection is classified as "nonrecreatable" or "non-accessible" for purposes of the reinspection program and the reason for the classification therefore;
- c. for each type of inspection, whether that type was included in the reinspection program, and if so,
  - (i) the total number of inspections performed;
  - (ii) the total number of reinspections performed;
  - (iii) the number of inspectors inspecting this attribute; and
  - (iv) of the number stated in (iii) above, the number of inspectors whose inspections of that attribute were reinspected and, for each inspector, the number of reinspections.
- d. If you answer to (c) is no, state why not.

12. With respect to Hunter Corporation, please state:

- a. a description of each type of inspection performed by any Hunter inspector;
- b. whether the inspection is classified as "nonrecreatable" or "non-accessible" for purposes of the

reinspection program and each reason for the classification;

- c. for each type of inspection, whether that type of inspection was included in the reinspection program and, if so,
- (i) the total number of inspections performed;
  - (ii) the total number of reinspections performed;
  - (iii) the number of inspectors inspecting this attribute; and
  - (iv) of the number stated in (iii) above, the number of inspectors whose inspections of that attribute were reinspected and, for each inspector, the number of inspections.
- d. If your answer to (c) is no, state why not.

13. Please identify and describe all instrument panels in the containment buildings utilizing expansion anchor bolts at Byron I and II, and state the size of the bolts.

14. Please state all justifications for the use of the size(s) indicated in response to Interrogatory 13.

Interrogatories 15 through 17 relate to the foundation, biological shield wall, and connections between them at Byron I and II.

15. Please specify the seismic criteria that relate to the original design(s), and all changes, if any, to that criteria over time.

16. Please describe all modifications that have been made or will be made and state the date(s) that the modifications were

designed and the date(s) they were or will be made.

17. Please state whether any cost studies, including studies showing costs or estimates of implemented and potential modifications have been done by or on behalf of Edison.

Interrogatories 18 and 19 relate to the hangers for the HVAC system and the seismic re-evaluation effort at Byron.

18. Please state whether any hangers were or will be modified as a result of the re-evaluation effort. If so, for each hanger that was or will be modified:

- a. identify the hanger;
- b. state who determined that the modification was or is necessary;
- c. state the date on which Edison or its agent determined that modification was or is necessary;
- d. describe the modification in detail;
- e. state the date on which the modification was or will be implemented;
- f. state the reasons for the modification; and
- g. state the cost of the modification.

19. Please state with respect to the seismic modification effort:

- a. whether any rework or reinforcement modification has been or is being performed or is planned relating in any way to seismic integrity or qualification;
- b. if your answer to (a) is yes, identify each component or structure on which such rework, modification or



reinforcement has been or is being performed or planned;

- c. describe the rework, modification or reinforcement;
- d. state the date(s) on which design of the component or structure was done;
- e. state the date construction of the component or structure was begun, and the date it was completed;
- f. list all reasons (e.g., design error, regulatory changes) for each item of rework, modification or reinforcement;
- g. state the date on which Edison discovered or was informed of each reason listed in item (f) and state who provided the information.

Interrogatories 20 through 23 relate to allegations in the Complaint filed in Wabash Valley Power Association, Inc. v. Public Service Company of Indiana Inc., Civil Action No. 84-2520.

20. Please state whether Edison has ever been informed by anyone that structural steel beams at Byron were overstressed. If your answer is yes, please:

- a. state the date Edison received the information;
- b. state the form in which Edison received the information and the person(s) who provided the information;
- c. state whether the NRC was notified of the information and if so, on what date and in what manner; and
- d. state all estimates of the costs related to inspection, repair, replacement, or modification of the beams, or the equipment or structures supported by the beams;



state whether the estimates include removal and reinstallation of previously installed equipment; and if not, why not.

21. Please state whether Edison has ever been informed by anyone that structural steel connections at Byron were overstressed. If your answer is yes, please:

- a. state the date Edison received the information;
- b. state the form in which Edison received the information and the person(s) who provided the information;
- c. state whether the NRC was notified of the information and if so, on what date and in what manner; and
- d. list all estimates of the costs related to inspection, repair, replacement or modification of the connections, or the equipment or structures supported by the connections; state whether the estimates include removal and reinstallation of previously installed equipment; and if not, why not.

22. Please state whether Edison has ever been informed by anyone that structural steel beams at Byron would have to be repaired. If your answer is yes, please:

- a. state the date Edison received the information;
- b. state the form in which Edison received the information and the person(s) who provided the information;
- c. state whether the NRC was notified of the information and if so, on what date and in what manner; and
- d. list all estimates of the costs related to inspection, repair, replacement or modification of the beams, or

the equipment or structures supported by the beams; state whether the estimates include removal and reinstallation of previously installed equipment; and if not, why not.

23. Please state whether Edison has ever been informed by anyone that structural steel connections at Byron would have to be repaired. If your answer is yes, please:

- a. state the date Edison received the information;
- b. state the form in which Edison received the information and the person(s) who provided the information;
- c. state whether the NRC was notified of the information and if so, on what date and in what manner; and
- d. produce all estimates of the costs related to inspection, repair, replacement or modification of the connections, or the equipment or structures supported by the connections; state whether the estimates include removal and reinstallation of previously installed equipment; and if not, why not.

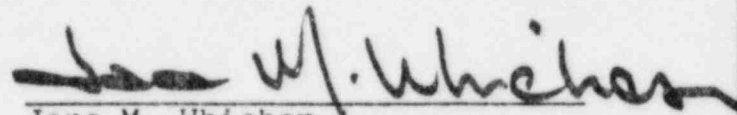
24. Please list each witness to be presented on Edison's behalf at the reopened hearings, and give a summary of that witness' testimony.

25. Please state whether there have been, at any time, any steel beams at Byron that have cracked or been suspected of cracking. If your answer is yes, please describe the circumstances in detail including identification of any NCRs issued, engineering reports or analyses made, and state whether

the NRC was notified and if so, in what manner.

26. Please state the date on which it was determined to move the fuel load date for Byron I to September 15, 1984, and each reason therefore.

DATED: May 9, 1984

A handwritten signature in dark ink, appearing to read "Jane M. Whicher", is written over a horizontal line.

Jane M. Whicher  
Attorney for Intervenors on  
issues and matters per-  
taining to quality assurance  
109 N. Dearborn, Suite 1300  
Chicago, IL 60602  
(312) 641-5570