

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of:

COMMONWEALTH EDISON COMPANY)

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

Docket Nos. 50-454
50-455

INTERVENORS' FIRST REQUEST TO EDISON
FOR PRODUCTION OF DOCUMENTS

As used herein, the term "document" means all writings and recordings of any kind, including but not limited to notes, memoranda, summaries, drafts and computer stored and/or generated data in the possession, custody or control of Edison or its contractors. The term "meetings" includes telephone conversations. The term "contractor" includes all contractors at Byron including the architect-engineers and the independent testing laboratories. The term "consultant" includes any expert or person with expertise consulted by Edison and/or its contractors in connection with the Byron plant.

Please produce the following documents:

1. ANSI N 45.2.6 - 1973 and all interpretations thereof adopted or used by Edison or its contractors.
2. ANSI N 45.2.6 - 1978 and all interpretations thereof adopted or used by Edison or its contractors.
3. All correspondence from Edison and/or its contractors to the NRC, and from the NRC to Edison and/or its contractors,

pertaining in any way to the 82-05-19 noncompliance and possible means of resolving that noncompliance (including but not limited to the reinspection program).

4. All notes, memoranda, recordings or memorializations of any kind concerning meetings concerning resolution of the 82-05-19 noncompliance:

- (a) of Commonwealth Edison employees;
- (b) of contractors' employees (whether or not Edison officials or employees were included); and
- (c) employees of Edison and/or its contractors and any consultant retained by Edison or with whom discussions were had concerning possible retention.

5. All documents concerning meetings, between Edison and/or Edison contractor employees and/or consultants, with officials or employees of the Nuclear Regulatory Commission concerning resolution of the 82-05-19 noncompliance.

6. All drafts of reports and letters pertaining to the reinspection program, together with a list of persons to whom the drafts were circulated, and copies of drafts (or any other type of writing) reflecting comments of persons to whom drafts were circulated. To the extent drafts were circulated to and commented upon by attorneys with Isham, Lincoln & Beale and you object on the grounds of any privilege, please indicate the attorney to whom circulated, and the date of the draft.

7. All "reinspection interpretations" as requested in the

letter from Jane M. Whicher to Michael Miller dated March 26, 1984.

8. All nonconformance reports (NCRs) concerning equipment supplied to Edison by Systems Control Corporation, as described in Mr. Miller's March 16 letter to the Atomic Safety and Licensing Appeal Board, and all documentation concerning the disposition of each, including but not limited to the February 17, 1984 written evaluation by Sargent & Lundy, all as requested in the March 16, 1984 letter from Ms. Whicher to Mr. Miller.

9. The "quality assurance submittals" requested in the April 30 letter from Ms. Whicher to Mr. Miller.

10. In the February 13, 1984 Affidavit of Louis Owen Del-George, it is stated that Edison has hired John L. Hansel "as an independent third-party expert to review the Byron Reinspection Program as well as the Contractor Practises (sic) for qualification and certification of QA/QC personnel at Byron". Please produce:

- (a) the contract between Edison and Mr. Hansel and all drafts of that contract;
- (b) all notes, memoranda or summaries of meetings between Mr. Hansel and Edison, and/or its contractors;
- (c) all correspondence between Mr. Hansel and Edison, and/or its contractors;
- (d) all drafts of Mr. Hansel's report together with a list of persons to whom the drafts were circulated, and copies of drafts (or any other type of writing) reflect-

ing their comments. To the extent drafts were circulated to and commented upon by attorneys with Isham, Lincoln & Beale and you object on the grounds of any privilege, please indicate the attorney to whom circulated, and the date of the draft.

- (e) For each meeting between Mr. Hansel and Edison, its contractors and/or its architect-engineers listed in your response to Interrogatory 6(e), please produce all notes, memoranda and other records of the meeting.

11. For each person listed in your response to Interrogatory 7(a), please provide:

- (a) All letters between him or her and Edison.
- (b) All notes, memoranda or other recordings of conversations between him or her and Edison.
- (c) All drafts of contracts with and reports by the expert.
- (d) All final contracts and reports by the expert.

12. Provide all engineering evaluations pertaining to the reinspection program.

13. For each meeting between Edison and the NRC listed in your answer to Interrogatory 1, please provide all notes and summaries pertaining to the conference.

14. Please produce all documents relied or reviewed in answering Interrogatory 9.

15. Please produce all audits and surveillances of the reinspection program.

16. Please produce all audits and surveillances of Systems Control Corporation, whether by Commonwealth Edison, by Pittsburgh Testing Laboratories, or any other entity.

17. Please produce all documents pertaining to Edison's Construction Assessment Program.

18. Please produce all documents (such as reports, summaries, or memoranda) pertaining to the Integrated Design Inspection (IDI) program at Byron, including but not limited to:

- (a) all meetings between Edison and its contractors concerning the results of the NRC inspections of Sargent and Lundy;
- (b) all enforcement meetings or conferences with the NRC;
- (c) all meetings with any consultant (including but not limited to Bechtel);
- (d) all meetings with potential consultants;
- (e) the contract between Bechtel and Edison;
- (f) all drafts of Bechtel's reports of its work, together with copies of comments by any persons to whom such drafts were circulated.
- (g) all correspondence between Bechtel and Edison.

19. With reference to Interrogatories 13 and 14, please produce all analyses of the bolt size(s) utilized.

20. Please produce all cost estimates and comparisons that relate to changing the size of the bolts during or after the design phase.

Requests 21 through 27 relate to the foundation, biological shield wall, and connections between them at Byron I and II.

21. Please produce all documents relating to the original design(s) of the foundation, biological shield wall, and connections between them.

22. Please produce all reports and analyses used to justify the integrity of the biological shield wall, foundation and connections.

23. Please produce all documents showing planned, proposed or potential modifications to the original design(s), no matter when generated, whether or not such modifications have been made.

24. Please produce all reports, studies and analyses of the original design(s) and the design(s) as modified (if applicable).

25. Please produce all documents that relate to the possible implementation of, or decision not to implement, any modifications.

26. Please produce all modification cost studies, including studies showing costs or estimates of implemented and potential modifications.

27. Please produce all documents showing, analyzing or discussing in a manner design errors or defects or potential errors or defects.

Requests 28 through 32 relate to the hangers for the HVAC system and the seismic re-evaluation effort at Byron.

28. Please produce all documents concerning potential or actual design defects or design or planning errors that relate to the hangers or the HVAC systems.

29. Please produce all documents relating to any seismic re-evaluations of the hangers for the HVAC system.

30. Please produce all documents relating to changes in the hangers or systems, whether planned, potential, or implemented.

31. Please produce all documents relating to analyses of the seismic integrity of the hangers or systems.

32. Please produce all documents relating to actual or estimated costs of design changes, corrections of defects or errors, and the re-evaluation effort.

Questions 33 through 36 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,

33. With respect to overstressing of structural steel beams at Byron:

- (a) produce all documents related to Edison's receipt of such information;
- (b) produce all estimates of the costs related to inspection, repair, replacement, or modification of the beams, and the equipment or structures supported by the beams; including whether the estimates include removal and reinstallation of previously installed equipment; and

- (c) produce all NCRs and other reports associated therewith.

34. With respect to overstressing structural steel connections at Byron:

- (a) produce all documents related to Edison's receipt of such information;
- (b) produce all estimates of the costs related to inspection, repair, replacement or modification of the connections, and the equipment or structures supported by the connections; including whether the estimates include removal and reinstallation of previously installed equipment; and
- (c) produce all NCRs and all other reports associated therewith.

35. With respect to actual or potential repair of structural steel beams at Byron would have to be repaired, please:

- (a) produce all documents related to Edison's receipt of such information;
- (b) produce all estimates of the costs related to inspection, repair, replacement or modification of the beams, and the equipment or structures supported by the beams; including whether the estimates include removal and reinstallation of previously installed equipment; and
- (c) produce all NCRs and other reports associated therewith.

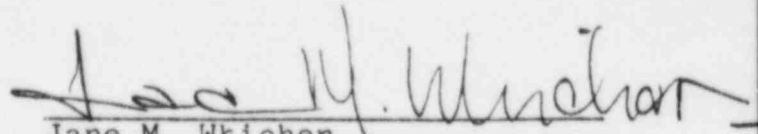
36. With respect to actual or potential repair of structural steel connections at Byron:

- (a) produce all documents related to Edison's receipt of such information;
- (b) produce all estimates of the costs related to inspection, repair, replacement or modification of the connections, and the equipment or structures supported by the connections; including whether the estimates include removal and reinstallation of previously installed equipment,
- (c) Produce all NCRs and other reports associated therewith.

37. Please produce all documents referred to in responding to Interrogatory 9, 11, 17, 18(g), and 25.

38. Please produce all documents referenced in responding to Interrogatories 2, 8, 20, 21, 22 and 23.

DATED: May 9, 1984


Jane M. Whicher
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NUCLEAR REGULATORY COMMISSION

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DOCKETED
USNRC

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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

CERTIFICATE OF SERVICE

I hereby certify this 9th day of May, 1984, that copies of "INTERVENORS' FIRST SET OF INTERROGATORIES TO EDISON" and "INTERVENORS' FIRST REQUEST TO EDISON FOR PRODUCTION OF DOCUMENTS" in the above captioned proceeding was served on the following by deposit in the United States mail, first class, or, as indicated by an asterisk, by Federal Express, or, by double asterisks, hand-delivered.

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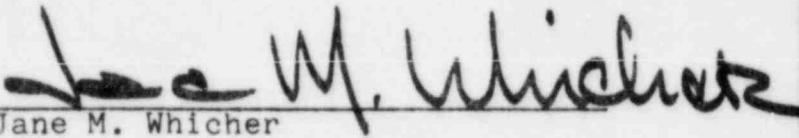
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DATED: May 9, 1984


Jane M. Whicher