

RELATED CORRESPONDENCE

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
THE CLEVELAND ELECTRIC)	Docket Nos. 50-440
ILLUMINATING COMPANY, <u>ET AL.</u>)	50-441
)	
(Perry Nuclear Power Plant,)	
Units 1 and 2))	

APPLICANTS' INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO INTERVENOR OHIO
CITIZENS FOR RESPONSIBLE ENERGY (FIFTH SET)

These Interrogatories and the Request for Production of Documents are filed by Applicants pursuant to the Licensing Board's Special Prehearing Conference Memorandum and Order, LBP-81-24, 14 N.R.C. 175 (1981), the discovery schedule established by the Licensing Board's Memorandum and Order (New Contention on Diesel Generators), dated December 23, 1983, and the Nuclear Regulatory Commission's Rules of Practice. The Interrogatories and Document Request are directed toward Intervenor Ohio Citizens for Responsible Energy ("OCRE") and pertain to Issue No. 16, concerning the reliability of the standby diesel generators manufactured for the Perry Nuclear Power Plant ("PNPP") by Transamerica Delaval, Inc. ("Delaval" or "TDI").

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The Interrogatories submitted herein are filed pursuant to 10 C.F.R. § 2.740b, which requires that the Interrogatories be answered separately and fully in writing under oath or affirmation within 14 days after service. The Interrogatories are intended to be continuing in nature; and the answers must be immediately supplemented or amended, as appropriate, should OCRE obtain any new or different information responsive to the Interrogatories.

The Request for Production of Documents is filed pursuant to 10 C.F.R. § 2.741, which requires that OCRE produce and either furnish copies of or permit Applicants to inspect and copy any documents responsive to the request which are in the possession, custody or control of OCRE. The Request for Production of Documents also is continuing in nature and OCRE must produce immediately any additional documents it obtains which are responsive to the Request.

For purposes of these Interrogatories, the term "document(s)" means all writings and records of every type in the possession, control or custody of OCRE, including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings, and all other writings or recordings of any kind. "Document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody or control of OCRE.

For purposes of these Interrogatories, a document shall be deemed to be within OCRE's "control" if OCRE has ownership, possession or custody of the document or copy thereof, or has the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

When identification of a document is requested, briefly describe the document, i.e., letter, memorandum, book, pamphlet, etc., and state the following information as applicable to the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

The purposes of these Interrogatories and the Request for Production of Documents are to clarify the scope of Issue No. 16 and to ascertain the factual bases which support each element of the Issue so that Applicants adequately can prepare their response to the Issue.

INTERROGATORIES

1. State the name, present or last known address, present or last known employer, and educational and professional qualifications of each person known to you to have first-hand knowledge of the facts alleged in Issue No. 16.

2. (a) State the name, title, employer and educational and professional qualifications of each person you intend to call as a witness on Issue No. 16.

(b) State the subject matter on which each such person is expected to testify.

(c) State the substance of the facts and opinions to which each such person is expected to testify.

(d) State a summary of the grounds for such opinions, and identify all documents upon which such person relies to substantiate such opinions.

3. Identify all documents in your possession, custody or control, including all relevant page citations, pertaining to the subject matter of Issue No. 16.

4. Identify all documents which you intend to offer as exhibits during this proceeding to support Issue No. 16 or which you intend to use during your cross-examination of witnesses presented by Applicants and/or the NRC Staff ("Staff") on Issue No. 16.

5. State each and every reason why you believe that the PNPP standby diesel generators "are not highly reliable." Ohio Citizens for Responsible Energy Motion To Resubmit Contention #2, dated September 6, 1983 ("Motion To Resubmit"), at 1. Describe in detail the bases for your answer.

6. Describe in detail the "pattern of deficiencies and substandard quality" which you believe "threatens the reliability of on-site electric power at PNPP." Id. at 3.

7. (a) Identify all the "known problems with Transamerica Delaval diesel generators," OCRE Response to Applicants' Answer to NRC Staff Supplemental Response Re Proposed

Diesel Generator Reliability Contention, dated December 22, 1983, at 2, which you believe affect adversely the reliability of the PNPP standby diesel generators. As to each such problem, state: the type of application of the diesel generator, e.g., nuclear or marine; the name of the plant, ship or other facility using the diesel generator; the rated capacity of the diesel generator; the type of diesel engine, e.g., straight-8 or V-16, and all other relevant design information; the number of hours of operation when the problem occurred; whether the problem occurred during type qualification testing, preservice testing, inservice testing, or actual operation; the cause(s) of the problem; and all other facts, details and circumstances concerning the problem. Identify all relevant documentation of the problem. Provide a detailed explanation of why you believe the particular problem applies to the PNPP standby diesel generators.

(b) As to each problem identified in response to (a) above, state whether you believe the problem has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each problem identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

8. (a) Identify all facts, findings, assertions and conclusions stated in IE Information Notice 83-58, dated August 30, 1983, which you believe demonstrate the unreliability of the PNPP standby diesel generators. As to each such item, provide a detailed explanation of why you believe the particular item applies to the PNPP standby diesel generators.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

9. (a) Identify all facts, findings, assertions and conclusions stated in IE Information Notice 83-51, dated August 5, 1983, which you believe demonstrate the unreliability of the PNPP standby diesel generators. As to each such item, provide a detailed explanation of why you believe the particular item applies to the PNPP standby diesel generators.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

10. (a) Identify all facts, findings, assertions and conclusions stated in the Newsday article entitled Maker of Shoreham Generators Has Record of Problems in U.S., dated August 16, 1983, attached to OCRE's Motion To Resubmit, which you believe demonstrate the unreliability of the PNPP standby diesel generators. As to each such item, provide a detailed explanation of why you believe the particular item applies to the PNPP standby diesel generators.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

11. (a) Identify all facts, findings, assertions and conclusions stated in the Newsday article entitled Cracks Now Confirmed in All 3 Shoreham Diesel Generators, dated August 24,

1983, attached to OCRE's Motion To Resubmit, which you believe demonstrate the unreliability of the PNPP standby diesel generators. As to each such item, provide a detailed explanation of why you believe the particular item applies to the PNPP standby diesel generators.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

12. (a) Identify all facts, findings, assertions and conclusions stated in the Newsday article entitled NRC Has Cited Builder of Equipment 59 Times, dated August 24, 1983, attached to OCRE's Motion To Resubmit, which you believe demonstrate the unreliability of the PNPP standby diesel generators. As to each such item, provide a detailed explanation of why you believe the particular item applies to the PNPP standby diesel generators.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved for the PNPP standby diesel generators. If

your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

13. (a) Identify all facts, findings, assertions and conclusions stated in the Newsday article entitled Shoreham Diesels' Troubled History (undated), attached to OCRE Response to Staff and Applicant Answers to OCRE's Motion To Resubmit its Contention #2, dated October 14, 1983 ("OCRE Response"), which you believe demonstrate the unreliability of the PNPP standby diesel generators. As to each such item, provide a detailed explanation of why you believe the particular item applies to the PNPP standby diesel generators.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

14. (a) Identify all facts, findings, assertions and conclusions stated in NRC Board Notifications relating to Delaval diesel generators, including all enclosures and attachments to the Board Notifications, which you believe demonstrate the unreliability of the PNPP standby diesel generators. As to each such item, provide a detailed explanation of why you believe the particular item applies to the PNPP standby diesel generators. For each item, identify the relevant Board Notification and provide appropriate citations.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

15. (a) Identify all facts, findings, assertions and conclusions stated in NRC Inspection Reports, including but not limited to notices of violation and notices of nonconformance, which you believe demonstrate the unreliability of the PNPP standby diesel generators. As to each such item, provide a detailed explanation of why you believe the particular item applies to the PNPP standby diesel generators. For each item,

identify the relevant Inspection Report and provide appropriate citations.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

16. (a) Identify all deficiencies which you believe affect adversely the reliability of the PNPP standby diesel generator crankshafts. As to each such deficiency, identify all relevant documentation of the deficiency and provide a detailed explanation of why you believe the deficiency applies to the PNPP standby diesel generators.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe

Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

17. (a) State whether you agree that the maximum torsional stress on the PNPP standby diesel generator crankshafts is only 60 percent of the design stress, and that the margin of safety at PNPP is therefore sufficiently great that there is reasonable assurance that the crankshafts will not crack from torsional stress throughout the life of the plant. If your answer is other than affirmative, describe in detail the bases for your answer.

(b) Describe in detail the bases for your assertion that, with respect to diesel generator crankshafts, "lower torsional stresses may not be a factor favoring safety." OCRE Response at 2 n. 4.

(c) State what you believe to be the range of torsional stresses for the PNPP standby diesel generators which would produce crankshaft cracking growth rates low enough not to be detected prior to completion of preservice testing but high enough to cause crankshaft failure before the end of the 40 year life of the plant. Describe in detail the bases for your answer.

18. (a) Identify all deficiencies which you believe affect adversely the reliability of the PNPP standby diesel generator connecting rod bearings. As to each such deficiency, identify all relevant documentation of the deficiency and provide a detailed explanation of why you believe the deficiency applies to the PNPP standby diesel generators.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

19. (a) State whether you believe that the design of the PNPP standby diesel generator crankshafts is likely to lead to cracking of connecting rod bearings. If your answer is other than negative, describe in detail the bases for your answer.

(b) State whether you believe that the PNPP standby diesel generators have unsupported, overhung connecting rod bearing ends. If your answer is other than negative, describe in detail the bases for your answer.

(c) State whether you believe that the PNPP standby diesel generators have excessive crankpin journal yawing. If your answer is other than negative, describe in detail the bases for your answer.

(d) State whether you believe that the PNPP standby diesel generator connecting rod bearings have excessive voids or pores. If your answer is other than negative, describe in detail the bases for your answer.

(e) If your answer to either (a), (b), (c) or (d) above is other than negative, state what corrective action(s) you believe Applicants must take to resolve each deficiency and describe in detail the bases for your answer.

20. (a) Identify all deficiencies which you believe affect adversely the reliability of the PNPP standby diesel generator pistons. As to each such deficiency, identify all relevant documentation of the deficiency and provide a detailed explanation of why you believe the deficiency applies to the PNPP standby diesel generators.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

21. (a) State whether you believe that the PNPP standby diesel generators are susceptible to piston crown-skirt separation. If your answer is other than negative, describe in detail the bases for your answer.

(b) If your answer to (a) above is other than negative, state why you believe that the PNPP piston design, which

provides that the piston crowns are bolted to the skirts through a "full stack" of Belleville washers, will not prevent separation. Describe in detail the bases for your answer.

(c) If your answer to (a) above is other than negative, state what corrective action(s) you believe Applicants must take to resolve the problem and describe in detail the bases for your answer.

22. (a) State whether you believe that the PNPP standby diesel generator pistons have stress risers. If your answer is other than negative, describe in detail the bases for your answer.

(b) If your answer to (a) above is other than negative, state why you believe that (1) heat treatment of the PNPP pistons, (2) deburring of the PNPP pistons prior to heat treatment, and (3) air cooling (as opposed to fan cooling) of the PNPP pistons after heat treatment were not sufficient to prevent stress risers. Describe in detail the bases for your answer.

(c) If your answer to (a) above is other than negative, state what corrective action(s) you believe Applicants must take to resolve the problem and describe in detail the bases for your answer.

23. (a) State whether you believe that the PNPP standby diesel generators are susceptible to cylinder head cracking. If your answer is other than negative, describe in detail the bases for your answer.

(b) If your answer to (a) above is other than negative, state whether you believe that cylinder head cracking is likely to result in cylinder head or engine failure. If your answer is other than negative, describe in detail the bases for your answer.

(c) If your answer to (a) above is other than negative, state what corrective action(s) you believe Applicants must take to resolve the problem and describe in detail the bases for your answer.

24. (a) Identify all deficiencies which you believe affect adversely the reliability of the PNPP standby diesel generator cylinder liners. As to each such deficiency, identify all relevant documentation of the deficiency and provide a detailed explanation of why you believe the deficiency applies to the PNPP standby diesel generator.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

25. (a) Identify all deficiencies which you believe affect adversely the reliability of the PNPP standby diesel generator cylinder blocks. As to each such deficiency, identify all relevant documentation of the deficiency and provide a detailed explanation of why you believe the deficiency applies to the PNPP standby diesel generators.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved for the PNPP standby diesel generators. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

26. (a) Identify all NRC regulations, regulatory guides and industry standards relating to the reliability of the PNPP standby diesel generators with which you believe Applicants fail or will fail to comply. As to each such regulation, regulatory guide or industry standard, describe in detail the bases for your answer, including the reasons for identifying the regulation, regulatory guide or industry standard.

(b) As to each regulation, regulatory guide or industry standard identified in response to (a) above, identify all specific provisions with which you believe Applicants fail

or will fail to comply. As to each such provision, describe in detail the bases for your answer, including the reasons for identifying the provision.

(c) As to each provision identified in response to (b) above, state what action(s) you believe Applicants must take to comply with the provision. Describe in detail the bases for your answer.

27. (a) State each and every reason why you believe that Regulatory Guide 1.9, "Selection, Design, and Qualification of Diesel Generator Units Used as Standby (Onsite) Electric Power Systems at Nuclear Power Plants," Rev. 2 (December 1979) ("Reg. Guide 1.9, Rev. 2"), applies to the PNPP standby diesel generators "[a]lthough Revision 2 of Regulatory Guide 1.9 is applicable to applications docketed after December 1979." OCRE Brief on Regulations and Guidance Applicable to Issue #16, dated January 16, 1984, at 6.

(b) Identify all specific provisions of Reg. Guide 1.9, Rev. 2 not contained in IEEE Standard 387-1977, "IEEE Standard Criteria for Diesel-Generator Units Applied as Standby Power Supplies for Nuclear Power Generating Stations" ("IEEE Standard 387-1977"), with which you believe Applicants fail to comply.

(c) As to each provision identified in response to (b) above, state whether you believe the provision is necessary to assure the reliability of the PNPP standby diesel

generators. If your answer is other than negative, describe in detail the bases for your answer.

(d) As to each provision identified in response to (b) above which you believe necessary to assure the reliability of the PNPP standby diesel generators, state what action(s) you believe Applicants must take to comply with Reg. Guide 1.9, Rev. 2. Describe in detail the bases for your answer.

28. (a) Identify all deficiencies which you believe exist in the specification for the PNPP standby diesel generators, including all revisions and attachments to the specification, and which you believe affect adversely the reliability of the standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

29. (a) Identify all deficiencies which you believe exist in the design of the PNPP standby diesel generators and which you believe affect adversely the reliability of the

standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

30. (a) Identify all deficiencies which you believe to exist in Delaval's Instruction Manual for the PNPP standby diesel generators and which you believe affect adversely the reliability of the standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

31. (a) Identify all hardware deficiencies, potential deficiencies and nonconformances for the PNPP standby diesel generators, including but not limited to those documented in Applicants' Deviation Analysis Reports and Nonconformance Reports, which you believe affect adversely the reliability of the standby diesel generators. As to each such item, describe in detail the bases for your answer, including the reasons for identifying the item.

(b) As to each item identified in response to (a) above, state whether you believe the item has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each item identified in response to (b) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the item and describe in detail the bases for your answer.

(d) Describe in detail the bases for your assertion that the documented hardware deficiencies for the PNPP standby diesel generators are "harbingers of trouble to come." Motion To Resubmit at 4 n. 1.

32. State whether you believe that the proposed corrective actions documented in Applicants' final report to the NRC Staff relating to installation of fuel oil line clamps, dated January 30, 1984, are adequate. If your answer is other than affirmative, state the additional corrective action(s) you

believe Applicants must take and describe in detail the bases for your answer.

33. (a) Identify all deficiencies which you believe existed with respect to the storage of the PNPP standby diesel generators prior to installation and which you believe affect adversely the reliability of the standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

34. (a) Identify all deficiencies which you believe exist with respect to the installation of the PNPP standby diesel generators and which you believe affect adversely the reliability of the standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

35. (a) Identify all deficiencies which you believe exist with respect to the type qualification program for the PNPP standby diesel generators and which you believe affect adversely the reliability of the standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

36. (a) Identify all deficiencies which you believe exist with respect to the factory testing of the PNPP standby diesel generators and which you believe affect adversely the reliability of the standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

37. (a) Identify all deficiencies which you believe exist with respect to the preoperational testing program for the PNPP standby diesel generators and which you believe affect adversely the reliability of the standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state whether you believe the deficiency has been or will be adequately resolved. If your answer is other than affirmative, describe in detail the bases for your answer.

(c) As to each deficiency identified in response to (a) above which you believe has not been or will not be adequately resolved, state what corrective action(s) you believe Applicants must take to resolve the deficiency and describe in detail the bases for your answer.

38. (a) Identify all deficiencies which you believe to exist with respect to the TDI Diesel Generator Owners Group

Design Review/Quality Revalidation Program ("DR/QR Program") and which you believe affect adversely the reliability of the PNPP standby diesel generators. As to each such deficiency, describe in detail the bases for your answer, including the reasons for identifying the deficiency.

(b) As to each deficiency identified in response to (a) above, state what action(s) you believe Applicants must take to assure the reliability of the PNPP standby diesel generators. Describe in detail the bases for your answer.

39. State the name, title or position, address, employer, and educational and professional qualifications of each person who provided information used in preparing responses to any of the foregoing Interrogatories.

40. For each person identified in response to Interrogatory #39, supra, state the number(s) of the Interrogatories for which information was supplied.

41. State the name, title or position, address, employer and educational and professional qualifications of each person who searched for documents in order to respond to any of the foregoing requests for identification of documents.

42. For each person identified in response to Interrogatory #41, supra, state the number(s) of the Interrogatories for which the search was conducted and the location where the search was conducted.

43. Identify any written or recorded statement of any individual pertaining to the subject matter of Issue No. 16 not

previously identified in response to the foregoing Interrogatories.

REQUEST FOR PRODUCTION OF DOCUMENTS

Applicants request that OCRE respond in writing to the following request for production of documents, and produce the original or best copy of each of the documents requested below at the Perry Nuclear Power Plant at the office of Mr. Bradley S. Ferrell of The Cleveland Electric Illuminating Company, or at a place mutually convenient to the parties.

The term "document(s)" means all writings and records of every type in the possession, control or custody of OCRE including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recordings, and all other writings or recordings of any kind. "Document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody or control of OCRE.

A document shall be deemed to be within the "control" of OCRE if it has ownership, possession or custody of the document or copy thereof, or has the right to secure the document or copy thereof from any person or public or private entity having physical possession thereof.

Applicants request that OCRE produce each and every document identified or described in the answers to Interrogatories #1 through #43, supra.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: Michael A. Swiger
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MICHAEL A. SWIGER

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Dated: March 9, 1984

March 9, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
THE CLEVELAND ELECTRIC)	Docket Nos. 50-440
ILLUMINATING COMPANY, <u>ET AL.</u>)	50-441
)	
(Perry Nuclear Power Plant,)	
Units 1 and 2))	

CERTIFICATE OF SERVICE

This is to certify that copies of the foregoing
"Applicants' Interrogatories and Request for Production
of Documents to Intervenor Ohio Citizens for Responsible
Energy (Fifth Set)" were served by deposit in the United
States Mail, express mail, postage prepaid, this 9th day
of March, 1984, to all those on the attached Service List.

Michael A. Swiger
Michael A. Swiger

DATED: March 9, 1984

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)

THE CLEVELAND ELECTRIC)
ILLUMINATING COMPANY)

Docket Nos. 50-440
50-441

(Perry Nuclear Power Plant,)
Units 1 and 2))

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