

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

3/12/84

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD ^{84 MAR 16} 110:35

In the Matter of

APPLICATION OF TEXAS UTILITIES
GENERATING COMPANY, ET AL. FOR
AN OPERATING LICENSE FOR
COMANCHE PEAK STEAM ELECTRIC
STATION UNITS #1 AND #2
(CPSES)

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

Docket Nos. 50-445
and 50-446

CASE'S SEVENTEENTH SET OF INTERROGATORIES
AND REQUESTS TO PRODUCE TO APPLICANTS

Pursuant to 10 CFR 2.740b and 2.741, CASE (Citizens Association for Sound Energy), Intervenor herein, hereby files this, its Seventeenth Set of Interrogatories and Requests to Produce to Applicants.

Please answer the following interrogatories and requests for documents in the manner set forth herewith:

1. Each interrogatory should be answered fully in writing, under oath or affirmation.
2. Each interrogatory or document response should include all pertinent information known to Applicants, their officers, directors, or employees, their agents, advisors, or counsel. Employees is to be construed in the broad sense of the word, including specifically Brown and Root, Gibbs & Hill, Ebasco, any consultants, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.
3. Each document provided should include a sworn statement of its authenticity.

4. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.
5. Identify the person providing each answer, response, or document.
6. These interrogatories and requests for documents shall be continuing in nature, pursuant to 10 CFR 2.740(e) and the past directives of the Licensing Board. Because of the time restrictions under which we are presently working, we request that supplementation be made on an expedited basis.
7. For each item supplied in response to a request for documents, identify it by the specific question number to which it is in response. If the item is excerpted from a document, identify it also by the name of the document. Please also provide the copies in the correct order (rather than in reverse order).
8. The term "documents" shall be construed in the broad sense of the word and shall include any writings, drawings, graphs, charts, photographs, reports, studies, slides, internal memoranda, handwritten notes, tape recording, calculations, and any other data compilations from which information can be obtained.

CASE'S INTERROGATORIES AND REQUESTS TO PRODUCE TO APPLICANTS

All of the interrogatories in this pleading pertain to the "T-Shirt" Incident (see articles attached to CASE's 3/12/84 Motion for Discovery Regarding "T-Shirt" Incident, to which this pleading is attached).

1. How many quality control inspectors wore the T-shirts?
2. What specifically was printed on the T-shirts?
3. Is there any validity to the alleged statement that craft workers had threatened to beat up the QC inspectors and rip the shirts off their backs?
4. If the answer to 3. is yes, provide a brief explanation of the reasons you believe this to be true.
5. If the answer to 3. is yes, provide for inspection and copying all documents (as defined on page 2, item 8, of this pleading) to support this conclusion.
6. Explain the rationale for the actions by management, supervisors, etc., regarding this incident.
7. Supply a brief chronology of events regarding the T-Shirt Incident (i.e., who first noticed the T-shirts and decided something should be done about them, at what time did that occur; who ordered that the QC inspectors who wore the shirts be confined in the room; who ordered that the QC inspectors be guarded during their confinement; who specifically, by name, went through the desks, lockers, and personal belongings of the QC inspectors while they were confined; etc.). Include in your answer the specific names and titles of the individuals who initiated the various actions involved, who carried out the actions involved, and the approximate time of day when each event occurred (on both Thursday and Friday, 3/8/84 and 3/9/84, and on any other days where any action was taken regarding this incident.
8. Supply for inspection and copying all tape recordings, handwritten notes, or other documents (as defined on page 2, item 8) relating to any discussions, counseling, etc. between Applicants, their employees or others identified on page 1, item 2 of this pleading, including the ombudsman.

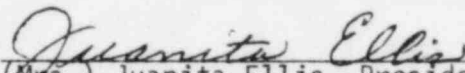
9. Supply for inspection and copying everything (documents, etc.) which was confiscated from the desks, lockers, etc. of the QC inspectors. (Since this was reported to be a cardboard box filled 2½ feet high with documents and personal items, we will want to have this provided in one stack so that we can get an idea of the actual size of the stack.)
10. It is our understanding that some personal items were returned to the inspectors. Provide a list of the specific items which have already been returned and to whom they were returned.
11. Provide the names of all QC inspectors who wore the T-shirts. (If the inspectors themselves do not want their names provided to the public, please provide some sort of documentation to this effect from the inspectors to the Board and we will be willing to discuss a protective order in this regard.)
12. Provide the names of all other QC inspectors in the particular group to which the QC inspectors who wore the T-shirts belonged. (See comment regarding protective order in 11. preceding.)
13. Did management or others go through the desks, lockers, and personal belongings of QC inspectors other than those who wore the T-shirts?
14. If the answer to 13. is yes, provide the names of those inspectors. (See comment regarding protective order in 11. preceding.)
15. If the answer to 13. is yes, was there any effort made to keep the items confiscated from the inspectors who wore the T-shirts separated from the items confiscated from the inspectors who did not wear the T-shirts?
16. If the answer to 15. is yes, how were they separated?
17. If the answer to 15. is yes, when you provide for inspection and copying those documents, include a note or other identification on those items.

18. Provide a statement as to whether or not any changes were made on any (as defined on page 2, item 8) of the documents/in any way prior to the time the Board ordered that they be retained in their current form. Include in your statement what specific changes were made and the reason for such change, as well as the name of the individual(s) who made such changes.
19. Include a statement which confirms that all documents, tape recordings, etc. requested have actually been provided to CASE (to be supplied when we look at the documents, etc.).
20. What specific actions were taken (if not already discussed in previous answers) by management, etc., towards the employees who wore the T-shirts or who were in the group with the employees who wore the T-shirts? (Please indicate if already included in previous answers.)
21. Have any of the QC inspectors involved (who wore the T-shirts or who are in the group with them) quit?
22. If the answer to 21. is yes, provide the names and addresses of such inspectors.
23. Was the NRC contacted prior to management's taking any action regarding this matter?
24. If the answer to 23 is yes, provide the name and title of the individual who contacted the NRC, as well as the name and title of the individual with the NRC who was contacted.
25. If the answer to 23. is yes, at what time of day was the NRC contacted?
26. If the answer to 23. is no, at what time of day and during what phase of events was the NRC contacted.
27. If the answer to 23. is no, provide the name and title of the individual who contacted the NRC, as well as the name and title of the individual with the NRC who was contacted.

28. What rationale was given by the QC inspectors for wearing the T-shirts?
29. During any of the interviews, discussions, etc., following the wearing of the T-shirts, did any of the QC inspectors express concern in any manner regarding changing of quality control procedures?
30. If the answer to 29. is yes, supply complete details regarding such discussions, etc., and their concerns.
31. If the answer to 29. is yes, supply the name(s) and addresses of such QC inspectors.
32. If the answer to 29. is yes, supply for inspection and copying all such procedures, including ~~the~~ original and all revisions.
33. If the answer to 29. is yes, explain the rationale for changing the procedure(s).
34. What was the response of the NRC representative identified in 24. or 27. to management's actions? Please give specific details.
35. What did the individual who contacted the NRC (identified in 24. or 27.) tell the NRC representative? Please give specific details.
36. Provide a summary of any and all telephone calls between the QC inspectors who wore the T-shirts (and the QC inspectors who were in the same group with them), and any of Applicants' employees (as defined under item 2 on page 1). Give full and specific details (such as who, what, when, where, etc.).
37. Have the QC inspectors who wore the T-shirts and the other QC inspectors who were in the same group with them been split up in any way?
38. If the answer to 37. is yes, provide specific details, including names, etc.

39. Have any of the QC inspectors who wore the T-shirts or the other QC inspectors who were in the same group with them been reassigned, or have their duties been changed in any way since the T-shirt incident on Thursday, 3/8/84?
40. If the answer to 39. is yes, supply complete details, including names, etc.

Respectfully submitted,



(Mrs.) Juanita Ellis, President
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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES GENERATING
COMPANY, et al.

(Comanche Peak Steam Electric Station
Station, Units 1 and 2)

Docket Nos. 50-445 and
50-446

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of

CASE'S SEVENTEENTH SET OF INTERROGATORIES AND REQUESTS TO PRODUCE TO

APPLICANTS

have been sent to the names listed below this 12th day of March, 1984,
by: Express Mail where indicated by * and First Class Mail elsewhere.

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Docketing and Service Section
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Washington, D. C. 20555

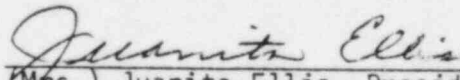
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