

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

DOCKETED 3/15/84  
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Docket Nos. 50-445  
and 50-446

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)

CASE'S TWENTIETH 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 Twentieth 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.

840320011B 840315  
PDR ADOCK 05000445  
PDR  
C

DS03

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

This is a continuation of our requests to update interrogatories and requests to produce to Applicants (see CASE's 3/14/84 Nineteenth Set of Interrogatories and Requests to Produce to Applicants).

Please supplement and update your responses to the following interrogatories and requests for documents; if there has been no change since your previous responses, please state "no change."

CASE's 3/1/82 Eighth Set of Interrogatories to Applicants and Requests to Produce:

5. With further reference to the audits discussed in 4 above (in the TCP series), the last audit report in the TCP series was TCP-29, which referred to deficiencies under date of December 17, 1981, and responses dated February 1 and 2, 1982.

Please provide for inspection and copying all audit reports since December 17, 1981. If responses have not yet been provided, supply the portion of the reports which detail the deficiencies now and the responses as they become available. (As with all discovery requests, these are to be continuing in nature and should be supplemented by Applicants in the future as new reports are prepared.)

9. We were supplied with one audit report identified as TBS-1, which was the only such report with the TBS prefix. The dates on it were March 26, 1980 for the deficiency report and June 4, 1980 for the response. Please explain (in a similar manner to that indicated in 6 above; i.e. Does this mean that Applicants (and/or Brown and Root) no longer do business with this company and haven't since March 1980? Or haven't Applicants performed any audits on this company since that time? Please Explain.)
11. How many audits have been performed by Hartford Steam Boiler regarding Comanche Peak?

CASE's 3/1/82 Eight Set (continued):

12. Please provide for inspection and copying all audits referenced in 11 above.
13. Please supply or provide for inspection and copying a list of all Brown and Root Quality Assurance/Quality Control personnel, including Quality Control Inspectors. Provide names, date hired, date terminated, reason for termination, area of responsibility, what level (level 1, 2 or 3). (NOTE: Applicants objected that this was too burdensome a request at the time it was made, and it was never fully answered at that time. However, because of the issue of intimidation, harassment, and threatening of Quality Control inspectors and other employees at Comanche Peak, which will be litigated in these proceedings, we now ask that you supply the requested information, at least to the following extent: For all Brown and Root QA/QC Inspectors. Also, include in your answer the upper management personnel -- say, the top twelve individuals -- and the names of supervisors and foremen of the various departments. If a flow chart is available, provide this also. Also provide the total number of Brown & Root QA/QC personnel currently employed at Comanche Peak.)
16. Please supplement your answers to the following questions, originally asked in CASE's 12/1/80 Second Set of Interrogatories to Applicants and Requests to Produce:
  - "21. Do you intend to call any witness in the upcoming hearing with regard to Contention 5?
  - "22. If the answer to Question 21 above is yes, supply the following information regarding each such witness:

CASE's 3/1/82 Eighth Set (continued):

16. (continued):

- "a. Name, address, and telephone number of the witness.
- "b. Company affiliation and title.
- "c. A summary of the witness's professional and educational background.
- "d. Any other information bearing on the witness's specific qualifications to testify with respect to Contention 5.
- "e. The nature of the witness's testimony and a brief summary of such testimony.
- "f. List or identify any and all documents which that witness intends to rely on in giving their testimony.
- "g. State whether or not such witness has conducted any research or made any studies on which such witness will rely.
- "h. If the answer to g. above is yes, state briefly the scope and nature of such research or study.
- "i. Provide copies of the witness's testimony.
- "j. Provide for inspection and copying any documents on which the witness relied in such testimony."

18. We understand from your previous answers to interrogatories that TUGCO maintains ultimate control over Quality Assurance/Quality Control at Comanche Peak and has since October 17, 1974, concurrent with the issuance of the Limited Work Authorization.

However, the FSAR indicates that Brown & Root, Inc. (B&R) as constructor and construction manager, is implementing the overall Quality Assurance system. In this regard, please supply the following information:

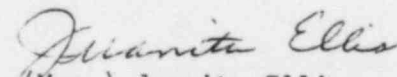
CASE's 3/1/82 Eighth Set (continued):

18. (continued):

- (a) Has TUGCO and/or TUSI taken over more direct control of QA/QC from Brown and Root that was initially the case at the beginning of the CPSES project?
- (b) If the answer to (a) above is yes, explain briefly the history of such change(s), the reason for such change(s), and any other pertinent details regarding such change(s).
- (c) Provide for inspection and copying any and all documents, including internal memos, handwritten notes, and all other documents (as defined on page 2 of this pleading) between Applicants and Brown and Root regarding Brown and Root's performance at CPSES.

This is not all of the requests for supplementation which we will be sending. We anticipate that we will be sending additional requests following the next hearing (or perhaps before the next hearing if we can find time to complete our review of our previous requests and Applicants' responses).

Respectfully submitted,

  
(Mrs.) Juanita Ellis

President

CASE (Citizens Association for Sound Energy)



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 3/15/84 Twentieth Set of Interrogatories and Requests to Produce to

Applicants

have been sent to the names listed below this 15th day of March, 1984,  
by: Express Mail where indicated by \* and First Class Mail elsewhere.

\* Administrative Judge Peter B. Bloch  
U. S. Nuclear Regulatory Commission  
4350 East/West Highway, 4th Floor  
Bethesda, Maryland 20814

Atomic Safety and Licensing Board  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

\* Dr. Kenneth A. McCollom, Dean  
Division of Engineering,  
Architecture and Technology  
Oklahoma State University  
Stillwater, Oklahoma 74074

Alan S. Rosenthal, Esq., Chairman  
Atomic Safety and Licensing Appeal  
Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

\* Dr. Walter H. Jordan  
881 W. Outer Drive  
Oak Ridge, Tennessee 37830

Dr. W. Reed Johnson, Member  
Atomic Safety and Licensing Appeal  
Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

\* Nicholas S. Reynolds, Esq.  
Bishop, Liberman, Cook, Purcell  
& Reynolds  
1200 - 17th St., N. W.  
Washington, D. C. 20036

Thomas S. Moore, Esq., Member  
Atomic Safety and Licensing Appeal  
Board  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

\* Geary S. Mizuno, Esq.  
Office of Executive Legal Director  
U. S. Nuclear Regulatory Commission  
Maryland National Bank Building  
7735 Old Georgetown Road - Room 10105  
Bethesda, Maryland 20814

Atomic Safety and Licensing Appeal  
Panel  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Docketing and Service Section  
(3 copies)  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

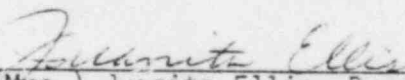
Renea Hicks, Esq.  
Assistant Attorney General  
Environmental Protection Division  
Supreme Court Building  
Austin, Texas 78711

John Collins  
Regional Administrator, Region IV  
U. S. Nuclear Regulatory Commission  
611 Ryan Plaza Dr., Suite 1000  
Arlington, Texas 76011

Dr. David H. Boltz  
2012 S. Polk  
Dallas, Texas 75224

Lanny A. Sinkin  
114 W. 7th, Suite 220  
Austin, Texas 78701

R. J. Gary, Executive Vice President  
Texas Utilities Generating Co.  
2001 Bryan Tower  
Dallas, Texas 75201

  
\_\_\_\_\_  
(Mrs.) Juanita Ellis, President  
CASE (Citizens Association for Sound Energy)  
1426 S. Polk  
Dallas, Texas 75224  
214/946-9446