

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
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OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

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)

Docket Nos. 50-445
and 50-446

CASE'S NINETEENTH 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 Nineteenth 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.

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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

Pursuant to the Board's 1/31/84 Memorandum and Order (Continuing Obligation to Update Interrogatories), as amended verbally (to delete the requirement that all parties file a statement by 2/29/84 that they have updated their answers to interrogatories (and requests to produce) so that they are current.

Since we have heard nothing further from our verbal request of 3/2/84, we are including a summary of it herewith also.

The following items were requested to be updated by phone from Juanita Ellis to Bill Horin 3/2/84; with the understanding that more requests would follow:

CASE's 4/5/82 9th Set of Interrogatories to Applicants and Requests to Produce:

16. Supply for inspection and copying the originals of each and every Non-Conformance Report (NCR) log. (Please update, including items which were open at the time they were introduced into evidence but have since been closed. Also, we will accept authenticated copies of the logs, rather than requesting to see the originals; please be certain, however, that the most recent logs, which we assume will be handwritten, are legible. Also, please be sure to include all NCR logs, including TUGCO and Brown & Root.) (See also CASE's 7/7/80 First Set to Applicants, 2.)
18. Supply for inspection and copying the originals of each and every Corrective Action Request (CAR) log. (See note in 16 above.)(See also First Set, 4.)
164. Supply for inspection and copying the originals of the following Non-conformance Reports (NCR's): (we will accept authenticated legible copies) (See also question 108.(f) of CASE's 11th Set to Applicants.)
(167) M-857

CASE's 5/7/82 11th Set to Applicants:

3. Provide for inspection and copying all documents regarding trending of (a) NCR's - Brown & Root; (b) NCR's - TUGCO; (c) DDR's; and (d) CAR's. (See original question for further details.)
25. Has there been any other trending done other than for the specific items we have already requested? (We believe this answer needs to be updated; IR's is one which immediately comes to mind.)
26. If answer to 25 is yes, please supply the following:
 - (a) A brief explanation of what such trending consists of.
 - (b) Supply for copying and inspection all documents regarding such trending. (See original question for further details.)

CASE's 8/9/82 13th Set to Applicants:

1. Provide for inspection and copying copies of the following NCR's (Non-conformance Reports), including all revisions and the originals:
 - (e) All NCR's written by Darlene Stiner.

Please supplement and update your responses to the following interrogatories and requests for documents:

CASE's 7/7/80 First Set of Interrogatories to Applicant:¹

8. How many internal audits have the Applicants performed on Brown & Root?
14. If the answer to item 12 is yes, supply copies of all publications or information by all such departments regarding the quality control, quality assurance, safety, workmanship, and method by which the plant is being built.
18. Supply copies of any and all progress reports to the public regarding CPSES, including information provided at the CPSES information center.
19. Supply copies of all quality control manuals, folders, pamphlets, and any other printed information regarding quality control, including procedures for quality control, not only current but the originals and all revisions.
20. Are there any audio tapes or video tapes of any of the information referred to in item 19?
21. If the answer to item 20 is yes, where are such tapes kept so that we can review them?
22. Supply copies of all quality control specifications manuals, folders, pamphlets, and any other printed information regarding quality control specification, not only current but the originals and all revisions.
23. Supply copies of all manuals, folders, pamphlets, and any other printed information regarding quality assurance, quality assurance specifications, and quality assurance procedures, not only current but the originals and all revisions. If this information has been supplied in response to item 19, so state.
24. Are there any audio tapes or video tapes of any of the information referred to in items 22 and 23?
25. If the answer to item 24 is yes, where are such tapes kept so that we can review them?
3. Supply copies of each and every Field Request for Engineering Action (FRE) log (requests made by someone in the field to the Engineering section to take some specific action, make some change, or requesting clarification or that Engineering make some judgement - please advise the proper name for such requests).

¹ See also CASE's 8/4/80 Response to and Motion Regarding Applicants' Answers to CASE's First Set of Interrogatories and Requests for Clarification.

CASE's Second Set of Interrogatories To Applicants and Requests to Produce
12/1/80:

7. Is it correct that the only audits which have been performed by insurers (industrial risk, builder's risk, etc.) on work done at the Comanche Peak plant are as follows; and are the referenced items all the items regarding such audits?

6-pages, 5/25/79, Brown & Root to National Board of Boiler & Pressure Vessel Inspectors

1-page, 6/25/79, Brown & Root to National Board of Boiler & Pressure Vessel Inspectors

6-pages, 6/8/79, from National Board of Boiler & Pressure Vessel Inspectors

8-pages, 4/17/79, from National Board of Boiler & Pressure Vessel Inspectors

8. If the answer to Question 7 is no, list the other audits which have been done (we are not asking for copies to be provided for inspection and copying in this question; we want to know which other audits have been performed).
9. If the answer to Question 7 is no, provide for inspection and copying all other such audits.
11. Is it correct that the only outside or sub-contractor evaluations, studies or audits which have been conducted at CPSES (by sub-contractors or agents of sub-contractors or by consulting firms or others, etc.) was the Muenow Report regarding problems with the concrete "honeycombing" (approximately 200 pages or so) under a cover letter dated 5/5/80?
12. If the answer to Question 11 is no, list the other evaluations, studies or audits which have been done (we are not asking for copies to be provided for inspection and copying in this question; we want to know which other audits have been performed).
13. If the answer to Question 11 is no, provide for inspection and copying all other such audits.

CASE's Sixth Set of Interrogatories to Applicants and Requests to Produce, 1/4/82 (erroneously initially dated 12/4/82 on first page):

2. Quoted 10 CFR Part 50, Appendix B, Section XVIII. AUDITS.

In this regard, please supply the following information (if different):

- (a) Describe briefly your "comprehensive system of planned and periodic audits."
- (b) Where is such description contained in your FSAR?
- (c) Supply for inspection and copying copies of "the written procedures or check lists" used for such audits.
- (d) Advise the procedure and method for documentation and review by management of audit results.
- (e) Advise the procedure and method for "followup action, including reaudit of deficient areas."
- (f) Supply for inspection and copying the written procedures for documentation and review by management of audit results.
- (g) Supply for inspection and copying the written procedures for "followup action, including reaudit of deficient areas."
- (h) Has the NRC conducted any audits to detect trends that may be detrimental to safe station operation?
- (i) If the answer to (h) above is yes, supply for copying and inspection all such audits.
- (j) Has the TUGCO Quality Assurance Division conducted any audits to detect trends that may be detrimental to safe station operation?
- (k) If the answer to (j) above is yes, supply for copying and inspection all such audits.

CASE's Sixth Set (continued):

2. (continued):

- (l) Have Station Quality Assurance personnel conducted any audits to detect trends that may be detrimental to safe station operation?
- (m) If the answer to (l) above is yes, supply for copying and inspection all such audits.

- 4. How many internal audits have Applicants now performed on Brown & Root?
- 5. How many of the internal audits of Brown & Root done by Applicants (references in question 4 above) were performed on Brown & Root in Houston and how many were performed on Brown & Root at Comanche Peak?
- 6. Please supply for copying and inspection all such audits referenced in Questions 4 and 5 above.
- 7. Quoted 10 CFR Part 50, Appendix B, Section XVII, QUALITY ASSURANCE RECORDS. In this regard, please supply the following information (if different):
 - (a) Please briefly describe Applicants' requirements concerning record retention, including duration, location, and assigned responsibility.
 - (b) Where is the information referenced in (a) above contained in Applicants' FSAR?

CASE's 2/10/82 Seventh Set of Interrogatories To Applicants and Requests To Produce:

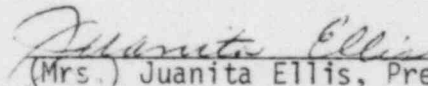
8. The following questions deal with TUGCO Corporate Quality Procedures/Instructions Manual (Rev. 0, 11/6/81), CQI-CS4.3 Vendor QA Program Evaluation System.
 - (a) Have any audits been performed or scheduled as the result of two consecutive release inspections resulting in unacceptable Vendor Evaluations indicating an adverse trend?
 - (b) If the answer to (a) above is yes, list the audits by number.
 - (c) When were the procedures set forth in this manual first completed in written form?
 - (d) If such procedures were completed in written form prior to 11/6/81, provide for inspection and copying all previous such procedures.
10. Have any audits been performed by or for any of the minor (other than Texas Utilities companies) owners of CPSES?
11. If so, provide for inspection and copying all such audits.
15. It has been reported in the newspapers that about 500 engineers are working in an area about the size of a basketball court to solve the pipe hanger/pipe support problem at CPSES.

How many engineeress are actually working on the problem or have been working on the problem?

How many other (than engineers) employees are working on the problem or have been working on the problem?
16. What is the current status of the pipe hanger/pipe support problem at CPSES? Please give specific details.

CASE is still working through and reviewing our previous interrogatories and requests to produce, and anticipate that there will be additional items which we will want to have updated. We will advise you of these in the next few days, hopefully before the March 19-23 hearings, so that you can have someone working on them.

Respectfully submitted,


(Mrs.) Juanita Ellis, President
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214/946-9446

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 Nineteenth Set of Interrogatories and Requests to Produce to

Applicants

have been sent to the names listed below this 14th day of March, 1984,
by: Express Mail where indicated by * and First Class Mail elsewhere.

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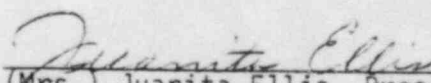
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