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April 3, 1984  
'84 APR -6 P3:38

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Glenn O. Bright  
Dr. James H. Carpenter  
James L. Kelley, Chairman

In the Matter of

CAROLINA POWER AND LIGHT CO. et al.  
(Shearon Harris Nuclear Power Plant,  
Units 1 and 2)

Docket 50-400 OL

ASLBP No. 82-468-01  
OL

Wells Eddleman's Interrogatories Based on Welder Info  
recently received (not based on talks w/welders)

Attorney Baxter for Applicants has a typo (or mistake) in  
a recent letter re the date of this. The 3d was approved. In a  
separate Motion, I argue for extension of time re information I may  
receive from the welders Applicants have finally identified after  
nearly a year's discovery dispute.

41-X-1(a) For each Welder in Appendix B, please state  
(i) the type of welding experience(s), e.g. shop welder, pipe welder,  
construction welder, each has had, for how many years (ii) each  
employer with whom that welder had experience (iii) whether Daniel,  
CP&L or anyone else checked with .. (aa) any (bb) each (cc) a  
previous employer re that welder's experience, specifying who  
contacted which previous employer, naming each previous employer and  
which person, entity or organization was involved in making the  
contact re experience. (iv) the welding techniques (oxyacetylene,  
stick or arc, MIG, TIG, etc) each such welder had experience in  
(v) all welding positions each such welder qualified in w/each  
previous employer (if known) (vi) any problems the welder had

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with any previous employer or on any previous job, which you are aware of, including discipline or discharge for bad or defective welding or for any other cause (specify ) (e.g. drug use, absenteeism, alcoholism, theft, conflict w/supervisor or other employee(s), etc)

(vii) all job training or other welding training received while with previous employer(s) (viii) all performance evaluations, transcripts or reports from welder training, etc for present and past employment, identifying all documents in your or Daniel's possession containing such information (ix) all disciplinary action taken against each such employee at Harris (x) reason for each (aa) discharge- give date (bb) layoff (give date) (cc) other termination of work, e.g. voluntary quitting of job -- give reason and date. Please state all reason(s) you know and identify all documents concerning each discharge, layoff, or other separation from work at Harris, for each such person.

(xi) identification of all documents concerning the employee's work record at Harris including discipline, job performance evaluations, any grievances filed by or against the welder, and any evaluation of performance in welding pipe hangers. (xii) which of these welders received retraining in pipe hanger welding or in welding or in blueprint reading (specify which) while at Harris, giving in detail the description, curriculum or outline of the training received, and stating any evaluation of that welder's performance in that training, and identifying all documents concerning retraining or training in the above-listed matters for each such welder (xiii) all training such welder had previously received in blueprint reading prior to work at Harris, and all documents' identification for documents concerning such training (xiv) all training in blueprint reading received after beginning work at Harris, including the date(s), curriculum and reason(s) for this training and all documents related to it or to the welder's participation in it, particularly any evaluations of said welder's performance in such training. (xv) any records on defective pipe hanger

welds made by each such welder ~~from~~ and the identification of any documents known to you which link each such welder with defective pipe hangers (xvi) identification of all documents concerning each such welder's assignment (aa) to (bb) away from, pipe hanger welding at Harris (xvii) any notes or documents whatsoever concerning this welder's pipe hanger welding performance, which you possess, please identify all such documents not already identified in response to the above (xviii) <sup>identification of, and identification of all documents re</sup> any reports of defective pipe hangers made by such welder at any time (xix) any documents re instruction in or familiarization with QA/QC procedure which were given to such welder or ~~used~~ in instructing or informing such welder; identify all such documents for each such welder (xx) any documents re any statements made or information given by (aa) CP&L (bb) Daniel (cc) anyone else known to you, to this welder, re (dd) defective pipe hanger welding at Harris (ee) blueprint reading problems in pipe hanger welding at Harris (ff) reporting, or not reporting, violations of NRC regulations re welding or pipe hangers (gg) reporting, or not reporting, violations of QA or QC or other applicable procedures re Harris pipe hangers or any such hanger(s) (hh) reporting, or not reporting, defective welds on Harris pipe hangers or any such hanger (jj) procedure for repairing defective pipe hangers or defective welds thereon (kk) procedure to follow when blueprint symbols for a pipe hanger are not clear to the welder (ll) procedure for welding pipe hangers at Harris (mm) speed or piecework requirements for welding pipe hangers at Harris (nn) pay rates or incentives re welding pipe hangers at Harris (oo) other information, procedures or plans, formal or informal, identifying each ~~x~~ such, which relate to pipe hangers at Harris or inspection thereof.

41-X-1(b) For each welder in Appendix A, please provide or provide copies of as ~~much~~ of the above-requested information or documents showing it, as is readily available. Please identify all

documents contain'ng such information.

(c) Please specifically identify all reasons for each (i) termination (ii) discharge (iii) layoff (iv) other leaving of a pipe hanger welding job at Harris, for each welder listed in Appendix A.

(d) Please specify all ~~a~~communications CP&L or Daniel has made with any welder identified in Appendix A, concerning (i) contention 41 (ii) the Harris OL proceeding (iii) the release of her/his name to Wells Eddleman (iv) rights or responsibilities to report defects to NRC (v) communication by the welder with Wells Eddleman and/or anyone ~~x~~ working for or with him (vi) communication with nuclear intervenors or anti-nuclear activists (vii) revealing or not revealing information concerning pipe hanger welds and/or defects therein at Harris. Please identify all documents which concern any of the above matters or which contain information re any communication inquired about above.

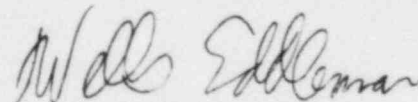
(e) ~~x~~ For each welder listed in Appendix A, please ~~m~~ state that welder's last known home telephone number.

(f) Please specify the instruction(s), if any, re (i) pipe hanger welding procedures (ii) blueprint reading for pipe hanger work (iii) blueprint reading generally (iv) defective welds (v) reporting of defects at Harris to QA/QC (vi) reporting of defects at Harris to <sup>in</sup> NRC (vii) communicating re defects at Harris ~~ix~~ pipe hangers to anyone other than CP&L, Daniel or NRC personnel (viii) not telling info about problems at Harris, esp. re pipe hangers, which (aa) any (bb) all (cc) any specific known welder or welders listed in Appendix A has received since beginning work at Harris, at any time, to your knowledge. Please identify the source of each such instruction(s) and identify all documents concerning each, including all notices put on display at Harris, and all internal ~~a~~communications or documents for communication to welders and/or other employees, re each such matter.

- (g) Please state which, if any, welders listed in Appendix A have been disciplined for (i) drug or alcohol problems (ii) making defective pipe hangers (iii) making ~~x~~defective pipe hanger welds at Harris. Please also identify all welders counseled or helped in any way re any of (i) thru (iii) above, specifying which and when. Please identify all ~~x~~ documents concerning each incident or instance of (aa) discipline (bb) counseling (cc) help, and/or the nature of such discipline, counseling or help, for each welder.
- (h) Please state which of these welders identified in Appendix A (i) is now welding (ii) is now available to weld, pipe hangers at Harris.
- (j) Please identify all new hires in Craft 66 pipefitters etc to date, (under the provisions of the Board's oral protective order of March 8 '84 I will hold these names in the same confidence, i.e. as subject to that order) who are not listed in Appendix A. Please state which of them have welded pipe hangers or are to weld on them. Please answer all of the above interrogatories where possible, for each<sup>s</sup> ~~x~~ such welder.
- (k) Please state what, if any, QA or QC experience (specify what experience, when, with what organization(s)), any welder identified in Appendix A or in response to the above, has had, to your knowledge, and identify all documents you possess concerning such experience or the training in QA or QC such welder has received.

#### PRODUCTION OF DOCUMENTS

Please make all documents identified in response to the above available to Wells Eddleman for inspection and/or copying at a mutually agreeable time ~~x~~ and place. Please identify those you believe may contain confidential information under the Board's protective order of March 8, 1984.

  
Wells Eddleman



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

In the matter of CAROLINA POWER & LIGHT CO. Et al. )  
Shearon Harris Nuclear Power Plant, Units 1 and 2 )

Docket 50-400  
O.L.

CERTIFICATE OF SERVICE

I hereby certify that copies of WKE 41 welder info interrogatories;  
W.E. Motion for Extension of Time;  
WeF. Partial Response and Contentions re Emergency Plan (Offsite)

HAVE been served this 3 day of April 1984, by deposit in  
the US Mail, first-class postage prepaid, upon all parties whose  
names are listed below, except those whose names are marked with  
an asterisk, for whom service was accomplished by \_\_\_\_\_

Judges James Kelley, Glenn Bright and James Carpenter (1 copy each)  
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US Nuclear Regulatory Commission  
Washington DC 20555

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Shaw, Pittman, Potts & Trowbridge  
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Ruthanne G. Miller  
ASLB Panel  
USNRC Washington DC 20555

Office of the Executive Legal Director  
Attn Dockets 50-400/401 O.L.  
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Docketing and Service Section (3x)  
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Certified by

W. D. Edleman