

UNITED STATES  
NUCLEAR REGULATORY COMMISSION

In the matter of  
C.P.Co. Midland Plant  
Units 1 & 2

Deskset Nos. 50-329  
50-330  
CM & GL

BEFORE THE ATOMIC SAFETY & LICENSING BOARD

3/27/81 INTERVENOR DISCOVERY REQUEST OF C.P.CO.

( Instructions and definitions as in 12/4/80 request )

DOCUMENT REQUESTS:

1. A 12/28/78 letter (tab.24 Vol.III 50-54f) was sent to consultants Peck and Hendren asking for their comments, and requesting that the "marked up copies" be sent back to Mr. Ferris. Please provide these "marked up copies" regarding backfill specifications.
2. Provide a copy of C.P.Co. April 17, 1980 Answer to Notice of Hearing.
3. Provide any written statements of consultants Peck or Hendren regarding the settlement problems at the Administration Building.
4. Provide any written statements of consultants Peck or Hendren regarding the removal and replacement of fill soils beneath the D.G.B., beyond those provided in the 50-54f or 50-55e responses.
5. Provide the Monthly Project Q.A. Activity Reports to Key Project Personnel for the months of July 1977 through November 1977, and for July 1978 through January 1978, in which any mention is made of Administration Building soil settlement or 1978 soil settlement matters.

INTERROGATORIES:

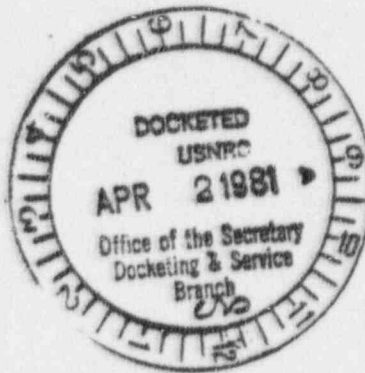
1. On what basis was the decision made to change the original mat foundation design for the D.G.B. to a shallow spread footing? Who made this decision when was it made, and when was the NRC informed?

8104080 403

2. Identify foundation design changes to any other Category I structures founded on plant area fill. On what basis were such decisions made? Who made these decisions, when were they made, and when was the ERC informed?
3. Were any corrective actions recommended as a result of the Administration Building settlement problems? If so please describe.
4. Have any stress analyses or observation programs<sup>22201</sup> instituted since 1977 for the Administration Building? If so please describe, and give results of such programs.
5. Were any settlement measurements taken on foundation soils of D.G.B. comparing soil levels just after placement to soil levels just prior to beginning construction? If so, please provide results.
6. Were any laboratory tests done to justify bearing capacities at the D.G.B.? If so, briefly identify them and the rationale behind the decision to take them.
7. Why was the cooling pond drained in the fall of 1979? How much was it drained? What information was gathered from this activity?
8. Whose handwritten notations and questions appear on the rough draft of Report on failure of grade beam O.4 line - Administration Building (file 73440 or 3990)?
9. Who were the key people that were involved in the Administration Building settlement assessment and decisions, that were also involved in decisions to begin and continue construction of D.G.B. shortly thereafter?
10. The March 8, 1978 I.O.M. from Afifi to Castlebury (copies to 1320, 3410) notes a conflict or confusion regarding borings. Please explain this exchange and provide the three referenced I.O.M.s.

Respectfully Submitted,

*Barbara Stamiris*



March 27, 1981

Dear Judge Beachhefer and Consumers Power Attorneys,

I will preface my discovery request with this informal letter of explanation in the hopes of expediting further objections or motions to compel, which I anticipate over the timing of this request.

Due to severe family health problems, I was unable to work on my intervention studies during the month of February. In March, I resumed my studies (with the March 2 arrival of C.P.Co. response to my 1/26/81 submittal).

Since then, in studying the documents provided and reviewing other seal settlement documents in preparing my answer to C.P.Co interrogatories I have come up with these discovery requests. I have tried to limit these requests to very specific items or documents (as discussed in previous compromise conversations with James Brunner).

Due to these extenuating circumstances and due to the timing of Consumer's responses to my requests this 3/27/81 Discovery Request falls within the scope of the ruling made at the last prehearing conference (p.4 of 2/27/81 Memorandum) to "file such requests as soon as possible."

I have not yet received Consumer's response to my 1/14/81 requests, but will hereby offer to submit any further and final discovery requests within three weeks of receiving their response if related questions are necessary.

Sincerely,

*Barbara Sternin*