

DOCKETED  
July 12, 1985 SNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

'85 JUL 16 P3 22

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

In the Matter of )  
COMMONWEALTH EDISON COMPANY )  
(Braidwood Nuclear Power Station, )  
Units 1 and 2) )

Docket Nos. 50-456  
50-457

/oc

NRC STAFF INTERROGATORIES TO INTERVENOR BRIDGET LITTLE  
POREM, ET AL. CONCERNING ITS QUALITY ASSURANCE CONTENTION

In accordance with 10 C.F.R. Sections 2.740, 2.740b and 2.741, the NRC Staff hereby serves Bridget Little Rorem, et al. (Rorem, et al.), as an intervenor in the above-captioned proceeding, with the following interrogatories and request for production of documents. These interrogatories and document requests relate to Rorem et al.'s amended contention, as admitted in the Licensing Board's Memorandum and Order (Admitting Rorem, et al. Amended Quality Assurance Contention) dated June 21, 1985.

Each interrogatory shall be answered separately and fully in writing under oath or affirmation, and shall include all pertinent information available to Rorem, et al., its members or counsel, based upon the personal knowledge of the person answering. Answers to these interrogatories are required to be served upon all parties to the proceeding within 14 days after service of the interrogatories. By each request for production of documents, the NRC Staff seeks to inspect and copy documents which are in the possession, custody or control of Rorem, et al., its members or counsel.

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For purposes of responding to these interrogatories: (1) the word "document(s)" means all writings and records of every type in the possession, control or custody of Intervenor Bridget Little Rorem, et al. or any individual acting on its behalf, including, but not limited to, memoranda, correspondence, reports, surveys, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, speeches, articles, transcripts, voice recording and all other writings or recordings of any kind; "document(s)" shall also mean copies of documents even though the originals thereof are not in the possession, custody, or control of Intervenor or any individual acting on its behalf if they have ownership, possession or custody of the document or copy thereof, or have the right to secure the document or copy thereof, from any person or public or private entity having physical possession thereof; (2) the word "Applicant" means Commonwealth Edison Company, its contractors and subcontractors, vendors, architect-engineer, consultants, agents and employees; (3) give the name, address, occupation and employer of the person or persons (a) answering each interrogatory, or (b) who have served, presently serve, or it is anticipated will serve as consultants or advisors to Rorem, et al. on the subject matter of the interrogatory; (4) identify each person whom you expect to call as a witness to testify at the hearing as to the issue addressed in the pertinent interrogatory. As to each such person, please state (a) the subject matter of his or her testimony and (b) the substance of the testimony and (c) the witness' professional or other qualifications to testify on the subject matter on which witness expects to testify; (5) is the answer based on conversations, consultations, correspondence or any other type of communications with one or

more individuals? If so, (a) identify each such individual by name and address, (b) state the educational and professional background of each individual, (c) describe the information received from such individual and its relation to your direct answer (d) identify each writing or record related to each conversation, consultation, correspondence or other communication with such individual.

In addition, Rorem, et al. is requested, pursuant to 10 C.F.R. § 2.740(e), to supplement its responses as necessary with respect to the identity of each person to be called as an expert witness at the hearing in this proceeding, the subject matter on which he or she is expected to testify, and the substance of such testimony. Similarly, Rorem, et al. is requested to amend its responses if Rorem, et al. subsequently learns that any response made to the interrogatories herein was incorrect when made, or that the response though correct when made is no longer correct.

# 1. INTERROGATORY

## Interrogatory 1

Are there instances other than those cited in subparts A.-F. of paragraph 1 which support your allegation that Applicant's QA program violates Criterion I of 10 C.F.R Part 50, Appendix B by failing to oversee the performance of their site contractors?

## Interrogatory 2

If the answer to Interrogatory 1 above is yes:

a. Describe each such instance in detail, including the time period during which it occurred.

b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 3

Are you aware of corrective actions which have been taken to remedy the situation set forth in paragraph 1.

Interrogatory 4

If the answer to Interrogatory 3 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 1. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 3.

Interrogatory 5

Explain the meaning of the term "widespread deficiencies" as used in paragraph 1 on page 19.

Interrogatory 6

Are the instances described in subparts A.-C. of paragraph 3 the sole instances upon which you rely as your basis for the contention that Applicant's QA program is not adequately documented by written policies, procedures and instructions and does not effectively control activities affecting quality?

Interrogatory 7

If the answer to Interrogatory 6 above is no:

- a. Describe in detail each additional instance on which you rely as a basis for paragraph 3.
- b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 8

Are you aware of corrective actions which Applicant has taken to correct the deficiencies cited in paragraph 3.

Interrogatory 9

If the answer to Interrogatory 8 above is yes:

- a. Describe such corrective actions with particularity.

b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 3. State with particularity your basis for your position.

c. Identify all documents relied upon in answering Interrogatory 8.

Interrogatory 10

Are the instances cited in subparts A. and B. of paragraph 4 the only instances which form the basis for the contention that training and indoctrination of those performing activities affecting quality was inadequate?

Interrogatory 11

If the answer to Interrogatory 10 above is no:

a. Describe in detail the other instances upon which you rely as the basis for this contention, including the date of their occurrence.

b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 12

Are you aware of corrective actions which Applicant has taken to remedy the situations in subparts A. and B. of paragraph 4.

Interrogatory 13

If the answer to Interrogatory 12 above is yes:

a. Describe such corrective actions with particularity.

b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 4. State with particularity your basis for your position.

c. Identify all documents relied upon in answering Interrogatory 12.

Interrogatory 14

Are the instances alleged in subparts A.-C. of paragraph 5 of your contention concerning quality assurance the only instances upon which you rely as the basis for your contention that there is inadequate program to assure that applicable regulatory requirements and design basis are

correctly translated into specifications, drawings, procedures, and instructions?

Interrogatory 15

If your answer to Interrogatory 14 above is no:

a. Describe in detail all other instances upon which you rely as the basis for subparagraph 5 of your contention.

b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 16

Are you aware of any corrective actions being taken by Applicant to correct the situations described in subparts A.-C. of paragraph 5 of your contention?

Interrogatory 17

If the answer to Interrogatory 16 above is yes:

a. Describe what you understand to be the corrective actions being taken by Applicant.

b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 5. State with particularity your basis for your position.

c. Identify all documents relied upon in answering Interrogatories 15 and 16.

Interrogatory 18

Are the instances specified in subparts A.-I. of paragraph 6 of your quality assurance contention the only instances on which you rely as the basis for your contention that there is inadequate prescription of activities affecting quality by documented procedures, instructions and drawings?

Interrogatory 19

If the answer to Interrogatory 18 above is no:

a. Describe in detail the other instances upon which you rely as the basis for paragraph 6 of your contention.

b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.



Interrogatory 20

Is the instance set forth in subpart A. of paragraph 7 of your contention the sole instance of inadequate document control which provides the basis for your contention that Applicant has failed to establish a program of adequate document control?

Interrogatory 21

If the answer to Interrogatory 20 above is no:

- a. Describe in detail the other instances you allege form the basis of paragraph 7 of your contention, including the date of occurrence of each instance.
- b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 22

Are you aware of any corrective actions taken by Applicant to provide adequate document control?

Interrogatory 23

If the answer to Interrogatory 22 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 7. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 22.

Interrogatory 24

Are the instances specified in subparts A.-F. of paragraph 8 of your contention the sole basis for your contention that Applicant's program for material and parts control is inadequate?

Interrogatory 25

If the answer to Interrogatory 24 above is no:

- a. Describe each instance in detail, including the time period during which it occurred.

b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 26

Are you aware of any corrective actions which have been taken by Applicant to improve materials and parts control at the Braidwood site?

Interrogatory 27

If the answer to Interrogatory 26 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 8. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 26.

Interrogatory 28

Are the instances set forth in subparts A.-E. of paragraph 9 of your contention the sole basis for your contention that Applicant's program does not provide adequate control of special process and adequate assurance that these special processes are accomplished in accordance with applicable codes and standards?

Interrogatory 29

If the answer to Interrogatory 28 above is no:

- a. Describe in detail each other instance of inadequate control or oversight of special processes which forms the basis for your contention in paragraph 9.
- b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 30

Are you aware of any corrective actions taken by Applicant to improve control of special processes and to ensure compliance with applicable codes and standards?



Interrogatory 31

If the answer to Interrogatory 30 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 9. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 30.

Interrogatory 32

Are the instances set forth in subparts A.-F. of paragraph 10 of your contention the sole basis for your contention that Applicant's inspection program is inadequate?

Interrogatory 33

If your answer to Interrogatory 32 above is no:

- a. Describe in detail each other instance of an inadequate inspection on which you rely for your contention.
- b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 34

Are you aware of any corrective actions proposed by Applicant to improve its inspection program?

Interrogatory 35

If the answer to Interrogatory 34 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 10. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 34.

Interrogatory 36

Are the instances set forth in subparts A.-D. of paragraph 11 of your contention the sole basis for your contention that the Applicant's program for the maintenance of records is inadequate?

Interrogatory 37

If your answer to Interrogatory 36 above is no:

- a. Describe in detail the other instances of inadequate maintenance of records which form the basis for paragraph 11 of your contention.
- b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 38

Are you aware of any corrective actions taken by Applicant to improve the maintenance of QA records?

Interrogatory 39

If the answer to Interrogatory 38 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 11. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 38.

Interrogatory 40

Are the instances set forth in subparts A.-J. of paragraph 12 of your contention the sole basis for your contention that Applicant has provided an inadequate program for the identification and correction of conditions adverse to quality.

Interrogatory 41

If the answer to Interrogatory 40 above is yes:

- a. Describe in detail such other instances the date of occurrence of each such instance.
- b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 42

Are you aware of any corrective actions which have been taken by Applicant to improve the identification and correction of conditions adverse to quality?

Interrogatory 43

If the answer to Interrogatory 42 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 12. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 42.

Interrogatory 44

Are there any instances other than those set forth in subparts A. and B. of paragraph 13 of your contention which form the basis of your contention that maintenance of sufficient records concerning activities affecting quality is inadequate?

Interrogatory 45

If the answer to Interrogatory 44 above is yes:

- a. Describe in detail each such instance and the date of occurrence of each incident.
- b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 46

Are you aware of any corrective actions taken by Applicant to improve the maintenance of records relating to activities affecting quality?

Interrogatory 47

If the answer to Interrogatory 46 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 13. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 46.

Interrogatory 48

Are the instances set forth in subparts A. and B. of paragraph 14 the sole basis of your contention that Applicant failed to institute a systematic program of audits of quality related activities?

Interrogatory 49

If your answer to Interrogatory 48 above is yes:

- a. Please describe in detail each instance.
- b. Identify all documents which relate to such instances by title, author, if any, date of issuance and, if other than NRC documents, provide a summary of their contents.

Interrogatory 50

Are you aware of any corrective actions taken by Applicant to improve its program of audits of quality related activities?

Interrogatory 51


If the answer to Interrogatory 50 above is yes:

- a. Describe such corrective actions with particularity.
- b. State your position as to whether such corrective actions would or would not be adequate to remedy the situation described in paragraph 14. State with particularity your basis for your position.
- c. Identify all documents relied upon in answering Interrogatory 50.

II. REQUEST FOR PRODUCTION OF DOCUMENTS

The NRC Staff requests that Rorem, et al., pursuant to 10 C.F.R. § 2.741, provide copies of, or make available for Staff inspection and copying, any documents designated by Rorem, et al. in response to the above interrogatories.

Respectfully submitted,

  
Janice E. Moore  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 12th day of July, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
COMMONWEALTH EDISON COMPANY	)	Docket Nos. 50-456
(Braidwood Nuclear Power Station,	)	50-457
Units 1 and 2)	)	

NOTICE OF APPEARANCE

Notice is hereby given that the undersigned attorney herewith enters an appearance in the above-captioned matter. In accordance with 10 C.F.R. § 2.713(b) the following information is provided:

Name	-	Janice E. Moore
Address	-	U.S. Nuclear Regulatory Commission Office of the Executive Legal Director Washington, DC 20555
Telephone Number	-	Area Code (301) 492-7313
Admission	-	Court of Appeals for the District of Columbia; United States District Court for the District of Columbia
Name of Party	-	NRC Staff U.S. Nuclear Regulatory Commission Washington, DC 20555

J. E. Moore  
Janice E. Moore  
Counsel for NRC Staff

Dated at Bethesda, Maryland  
this 12th day of July, 1985

\*85 JUL 16 P3:22

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

OFFICE OF SECRETARY  
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BRANCH

COMMONWEALTH EDISON COMPANY

Docket Nos. 50-456  
50-457

CERTIFICATE OF SERVICE

Lawrence Brenner, Esq., Chairman\*  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Commonwealth Edison Company  
ATTN: Cordell Reed  
Assistant Vice President  
P.O. Box 767  
Chicago, IL 60690

Dr. A. Dixon Callihan  
Administrative Judge  
102 Oak Lane  
Oak Ridge, TN 37830

Thomas J. Gordon, Esq.  
Waller, Evans & Gordon  
2503 S. Neil  
Champaign, IL 61820

Dr. Richard F. Cole  
Administrative Judge  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Region III  
U.S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
799 Roosevelt Road  
Glen Ellyn, IL 60137

Rebecca J. Lauer, Esq.  
Isham, Lincoln & Beale  
Three First National Plaza  
Suite 5200  
Chicago, IL 60602

Joseph Gallo, Esq.  
Isham, Lincoln & Beale  
Suite 840  
1120 Connecticut Avenue, N.W.  
Washington, DC 20036



Ms. Bridget Little Rorem  
117 North Linden Street  
Essex, IL 60935

Douglass W. Cassel, Jr., Esq.  
Timothy Wright, Esq.  
109 North Dearborn Street  
Suite 1300  
Chicago, IL 60602

Erie Jones, Director  
Illinois Emergency Services  
and Disaster Agency  
110 East Adams  
Springfield, IL 62705

Lorraine Creek  
Route 1, Box 182  
Manteno, IL 60950

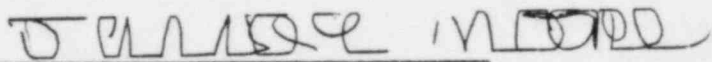
Robert Guild, Esq.\*\*  
c/o Cassel  
3242 N. Racine  
Chicago, IL 60657

C. Allen Bock, Esq.  
P.O. Box 342  
Urbana, IL 61801

Atomic Safety and Licensing Board  
Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Atomic Safety and Licensing Appeal  
Board Panel\*  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Docketing and Service Section\*  
Office of the Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

  
Janice E. Moore  
Counsel for NRC Staff