

8/7/85

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.(Comanche Peak Steam Electric
Station, Units 1 and 2)Docket Nos. 50-445^{OL}
and 50-446DOCKETED
USNRC(Application for an
Operating License)⁸⁵ AUG 12 AIO:12OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCHCASE'S REQUEST FOR SUPPLEMENTATION
OF APPLICANTS' ANSWERS TO PREVIOUS
CASE'S DISCOVERY REQUESTS TO APPLICANTS

In the Licensing Board's 7/22/85 Memorandum and Order (Motions Related to the MAC Report), the Board struck CASE's Interrogatory 5, in its entirety, but stated:

"However, the parties are encouraged to discuss whether CASE has legitimate needs for some class of information that CASE can define in a more precise manner. If CASE has such needs and cannot obtain agreement to those needs, it may file more precise interrogatories on this subject within fifteen days from the date of issuance of this order."

In reviewing our past discovery requests, we believe that some of the information sought may be discoverable under previous discovery requests; we are including those which we believe might come under this category in the following listing, regarding which we ask that Applicants supplement their responses to the previous discovery requests as set forth herein. (It should be noted that not all of our requests for supplementation necessarily fit into this category; we are requesting supplementation of other items in addition to those.)

Please supplement your answer to 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, and should include a sworn statement of the truthfulness of the answer, signed by the specific individual who answered and has personal knowledge of the matter under discussion.

2. Each interrogatory or document response should include all pertinent information known to: Applicants, their officers, directors, or employees, their agents, advisors, or counsel.

The term "Applicants" (as it always should have been) is to be construed as both major and minor owners of Comanche Peak.

The term "employees" is to be construed in the broad sense of the word, including specifically (but not limited to): Brown and Root, Gibbs & Hill, Ebasco, Cygna, O. B. Cannon, Stone & Webster, CPRT, any consultants, sub-contractors, and anyone else performing work or services on behalf of the Applicants or their agents or sub-contractors.

3. The terms "documents" and "documentation" shall be construed in the broad sense of the words and shall include any and all writings, drawings, graphs, charts, photographs, reports, studies, audits, slides, internal memoranda, informal notes, handwritten notes, tape recordings, procedures, specifications, calculations, analyses, and any other data compilations from which information can be obtained. Include print-outs of any and all such information which is contained on computer discs or in computerized files or similar files.

The term "documents" shall also include any and all contracts, letters of understanding, letters of intent, purchase orders, statement of protocol, statement of scope, any and all other related or similar documents, and all other pertinent information.

4. Each document provided should include a sworn statement of its authenticity, signed by the specific individual who answered and has personal knowledge of the document.
5. Answer each interrogatory in the order in which it is asked, numbered to correspond to the number of the interrogatory. Do not combine answers.
6. Identify the person providing each answer, response, or document.
7. 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.
8. 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).

Please supplement Applicants' responses to the following previously filed

CASE'S INTERROGATORIES TO APPLICANTS AND REQUESTS TO PRODUCE

CASE's 7/7/80 First Set of Interrogatories to Applicant, page 2 (as clarified in CASE's 8/4/80 Response to and Motion Regarding Applicants' Answers to CASE's First Set of Interrogatories and Requests for Clarification, pages 3 through 7):

Questions 3, 8, 9, 10, and 11

CASE's Second Set of Interrogatories to Applicants and Requests to Produce:

Questions 7, 8, 9, 11, 12, 13; and 22(j) regarding documents relied on by Applicants' witnesses in the 2/84, 3/84, and 4/84 welding hearings

CASE's 1/4/82 Sixth Set of Interrogatories to Applicants and Requests to Produce (erroneously marked 12/4/82 in the top right-hand corner of the first page and on the attached Certificate of Service, but correctly indicated as being served 1/4/82), pages 3 and 4 (see also Applicants' 1/25/82 Answers to CASE's Sixth Set of Interrogatories (erroneously marked 1/25/81 in top right-hand corner of first page but correctly shown on service list), page 3, and Applicants' 2/8/82 Response to CASE's Sixth Set of Requests for Production of Documents and Clarification of Responses to Certain Interrogatories, page 2).

Questions 2 (all sub-parts), 4, 5, 6, 7(a), 7(b)

CASE's 2/10/82 Seventh Set of Interrogatories to Applicants and Requests to Produce, page 7:

Questions 10 and 11

Please note that Questions 10 and 11 stated:

"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."

Your responses to Questions 10 and 11 should specifically include (but not be limited to) any and all audits which have been performed by or for the minor owners by Southern Engineering Company of Atlanta, Georgia; these audits should specifically include (but not be limited to) any and all Project Monitoring and Evaluation Reports.

Further, if the title for this type of audit report by or for the minor owners is changed (i.e., not specifically called an audit but containing generally the same kind of information), your answers should be supplemented and the documents requested provided (regardless of what name they are called by).

See also CASE's 3/1/82 Eighth Set of Interrogatories to Applicants and Requests to Produce, questions 23, 24, 25.

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

Questions 5, 10, 11, 12, 18(a), 18(b), 18(c), 19(a), 19(b), 19(c), 19(d), 19(e), 19(f), 19(g), 19(h), 19(i), 19(j), 19(k), 19(l), 20, 21, 22, 23, 24, and 25

Please note that Applicants stated in their 4/1/82 Applicants' (1) Responses to Requests to Produce, (2) Supplementation of Answers to CASE's Eighth Set of Interrogatories and Requests to Produce, and (3) Motion for Protective Order (page 5, regarding questions 19(b) and 19(d)):

"In addition, to assist CASE in understanding our response, Applicants will provide for inspection and copying a sampling of various management reports. Also, Applicants invite CASE to meet with Comanche Peak project management to discuss how the project is managed and to respond to any questions CASE might have. Applicants believe that this would provide an opportunity for CASE better to understand management activities as they relate to Contention 5."

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

Questions 10, 11, 12, 13, 14, 16, 18, 49, 50, 51, 52, 53, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 80, 81, 92, 93, 94, 95, 96, 97, 98, 99, 100, 113, 114, 115, 119, 127, 128, 137, 138, 139, 158, 159 (do not have to provide originals), 162 (there appears to have been a change in the way NCR Logs have been kept recently when compared to previous years; please explain the difference)

CASE's 4/20/82 Tenth Set of Interrogatories to Applicants and Requests to Produce:

Question 3 (do not have to provide originals): Provide all NCR's listed in the NRC Staff's SSER's as having been reviewed by the TRT.

Question 5 (do not have to provide originals).

Question 7 (do not have to provide originals). Please note that some of the following should also have been provided under the Board's ruling during the 3/23/84 hearings, Tr. 11964/21-11965/13. All should be provided in response to CASE's 2/25/85 Fourth Set of Interrogatories to Applicants and Requests to Produce Re: Credibility, Question 10, pages 23 and 24.

Provide the following documents:

- S1. (a) Any and all documents (in the broad sense of the word, as defined herein) regarding the investigation performed regarding any and all bundles of weld rods which were found (including the bundles of uncontrolled weld rods referred to in Darlene Stiner's testimony) (Applicants' Exhibit 177, page 30, A33, and Baker testimony, Tr. 10132/14-10134/10 and 11913/21-11914/17).
- (b) Any and all "instructions [which] were issued to reinforce the need to assure close control of weld rods at Comanche Peak" (Applicants' Exhibit 177, page 30, A33).
- (c) Any and all deficiency paper or three-part memos regarding QC inspectors bringing in loose weld rods (Brandt testimony, Tr. 11427/8-12).
- S2. The nonconformance procedure which was in effect at the time of the 3/21/84 hearings, as well as the original and all other subsequent revisions, which a QC inspector would have used to write an NCR if he/she found uncontrolled weld rods (Tr. 11270/7-11).
- S3. (a) Access to (with the option of being provided with copies of) each and every welding engineering department audit report (prepared every two weeks), procedure, inspection report, check list, shortage log, and note of conversations between rod shack personnel and Mr. Baker's supervisors, from 1978 through 3/23/84 (Tr. 11770/1-11773/7 et seq., 11778/16-22).

- (b) Access to (with the option of being provided with copies of) each and every QC audit report, procedure, inspection report, check list, shortage log, three-part requisition, and note of conversations between rod shack personnel and Mr. Baker's supervisors, prior to August 1978 (Tr. 11778/23-11781/5).
 - (c) Any and all shortage logs and shortage reports (Baker testimony, Tr. 11891/10-11893/21).
 - (d) Any and all field deficiency reports (FDR's) on weld rod control problems (Applicants' Exhibit 177, Page 33, A37, and Brandt testimony, Tr. 11272/22-11273/24).
 - (e) Any and all NCR's on weld rod control violations (Applicants' Exhibit 177, Page 33, A37).
 - (f) Any and all documentation that a welder was terminated or subjected to other disciplinary action for violation of weld rod procedures (Baker testimony, Tr. 10131/11-10132/1).
- S4. The rod accountability log and WFML (Baker testimony, Tr. 11906/18-11907/25).
 - S5. The document regarding the reinstruction of personnel in weld rod procedures (Baker testimony, Tr. 11912/1-11913/20).
 - S6. Any and all documents (in the broad sense of the word, as defined herein) regarding the testing of the electrode, including the testing performed on the seven-month-old rod, the materials engineering lab procedures which were followed (Baker testimony, Tr. 11896/11-14, 11898/5-11899/17).
 - S7. Any and all audits done (by the technicians' supervisor) of the way the technicians compile the monitoring reports, and any and all OA audits of the inspectors' reports (Tr. 11876/18-11878/24).
 - S8. All Welding Engineering Department inspection reports of the rod distribution stations for compliance with procedures (Applicants' Exhibit 177, page 23, A29).
 - S9. Any and all documentation of the orientation of welders regarding weld rod control (Applicants' Exhibit 177, pages 27 and 28, A32).

S10. Complete documentation package on hanger SI-0135032.S35R, the weld rod accountability log for the time in question, the records that reflect that the welder checked out 50 rods, the amount he returned, his checking out additional rods for another job, amount returned, etc. (i.e., all documentation to support Applicants testimony at Applicants' Exhibit 177, pages 29 and 30, A33).

S11. (a) All documents (in the broad sense of the word, as defined herein) relied on in any way for the testimony of Mr. Brandt (at Tr. 11389/11-11390/22) regarding the investigation made of the five areas of the plant which Applicants investigated and/or which "determined that Henry or Darlene Stiner did not weld on" any of the "integral attachments on the feedwater and the main steam lines requiring Charpy impact testing."

(b) All documents (in the broad sense of the word, as defined herein) relied on in any way for the testimony of Mr. Baker (at Tr. 10013/10-10014/2, 10101-10104 and 11764/12-11765/17) regarding his testimony that Mr. and Mrs. Stiner did not weld on Charpy impact materials.

(c) What is the criteria utilized by Applicants to determine which component supports and/or lines of pipe require Charpy impact testing? Supply any and all documentation (in the broad sense of the word, as defined herein) (see (a) and (b) above).

(d) The printout of all the structural attachments to the main steam system and portions of the feedwater system, and all documentation reviewed to verify the welders that made the welds on those systems (to determine that Henry Stiner did not weld on any Charpy impact tested material) (Baker testimony, Tr. 9995/16-9997/11).

S12. All 15 welding engineering inspection reports on Henry Stiner and all 28 welding engineering inspection reports on Darlene Stiner (Applicants' Exhibit 177, bound in following Tr. 9976, pages 12 and 13, A13).

S13. Any and all deficiency paper, including but not limited to NCR's, parameter monitor's checklists, etc., for violations of procedures found during the surveillance of a welder by the welding technicians (Baker testimony, Tr. 10072/12-10085/2).

- S14. The DCA or CMC which gave generic instructions on how to repair the columns that had misdrilled holes (Brandt testimony, Tr. 11401/7-11); The blanket design change authorization for the welding of misdrilled holes (Baker testimony, Tr. 10039/7-17). If there is more than one, provide each and every one; also provide the original and all revisions of each. (Perhaps one may be DCA 5347; see Brandt testimony, Tr. 11407/8-9.)
- S15. (a) That portion of MS100 which requires engineering approval for any base metal repairs (Brandt testimony, Tr. 11402/1-3); provide original and all revisions.
- (b) The procedure which has provisions for making base metal repairs and a sample of a repair process sheet referred to in Mr. Baker's testimony (Tr. 11765/25-11766/14).
- (c) The procedure in effect as of 3/23/84 on non-ASME repairs of misdrilled holes, the original and all revisions (Baker testimony, Tr. 11784/23-11785/12).
- S16. (a) Any and all repair process sheets on misdrilled holes in base plates (Brandt testimony, Tr. 11402/1-11), both on pipe supports and cable tray supports.
- (b) Any and all repair process sheets, inspection reports, construction travelers, QC inspection reports, and NDER's on misdrilled holes in base plates and in I-beams, both on pipe supports and cable tray supports (Baker testimony, Tr. 10037/23-10039/1 and 11766/18-11767/4).
- (c) If not provided in response to the preceding, any and all documents (in the broad sense of the word, as defined herein) in connection with any and all instances of unauthorized welds on misdrilled holes and the repair of misdrilled holes by Mr. Coleman (Tr. 11783/20-11784/15, 11786/20-11787/22).
- S17. Procedure MES106B and the procedure that replaced MES106B, and WS029 (or whatever the correct procedure numbers are), and any and all such procedures for welding of misdrilled holes on ASME pipe supports (Brandt testimony, Tr. 11457/14-11458/12). Provide the original and all revisions of each.

- S18. Any and all documents (in the broad sense of the word, as defined herein) regarding the investigation into Mrs. Stiner's testimony that she had welded misdrilled holes on the fab table in the turbine building at the direction of her foreman, James Stembridge (Tr. 11781/8-11783/19).
- S19. Any and all documents (in the broad sense of the word, as defined herein) regarding the test performed on the plug weld, including the lab report and the test report itself (Applicants' Exhibit 177, pages 43 and 44, A50, and Baker testimony, Tr. 11904/1-11906/18, 11910/5-11911/9).
- S20. Any and all documentation, including test results, test reports, etc., regarding the testing where a thermocouple was inserted into the weld joint to observe a heat curve of a heat input and a cooling rate (Baker testimony, Tr. 10009/10-15).
- S21. Any and all documents (in the broad sense of the word, as defined herein) regarding the investigation performed regarding Mrs. Stiner's testimony that Mr. Braumueller excessively weave-welded on Hanger TWX 039714A35R (TWX 039714A 354) including (but not limited to) the complete documentation package, drawings, WFML's, plates for the inspections, all handwritten notes, NCR's, etc. (Tr. 11787/23-11797/19 and Baker testimony, Tr. 10043/25-10045/2).
- S22. Any and all NCR's on weave welding (Baker testimony, Tr. 10132/10-13).
- S23. Any and all documents (in the broad sense of the word, as defined herein, including but not limited to handwritten notes, etc.) of Mr. Baker's interviews of welders Messrs. Rivera, Fullwood and Garcia (Baker testimony, Tr. 9972/4-16 and 10062/5-10063/4).
- S24. All documents (in the broad sense of the word, as defined herein, including handwritten notes, etc.) regarding Mr. Baker's interviews of "numerous welders, welding technicians, fitters, welding foremen, and construction supervision" regarding downhill welding (Applicants' Exhibit 177, pages 16 and 17, A23).
- S25. Any and all documentation (including, but not limited to, handwritten notes, etc.) regarding Mr. Baker's interviews with several welders (regarding exceeding four core wire diameters, etc.) (Baker testimony, Tr. 10056/1-19).

- S26. Any and all NCR's on weave welding (originals and all revisions) (Baker testimony, Tr. 10057/16-10059/21).
- S27. Henry Stiner's personnel records (Tr. 11879/23-11883/16). (Note: All of Henry Stiner's personnel records should be provided in response to CASE's 2/25/85 Fourth Set of Interrogatories to Applicants and Requests to Produce Re: Credibility, Question 14, pages 30 and 31, as well.)
- S28. All foremen's time sheets for the period of time during which Henry Stiner was at the plant and all applicable personnel records of Henry Stiner's foremen (Baker testimony, Tr. 11964/5-11965/13).
- S29. Procedure WES-29 for welding of cable tray supports and miscellaneous steel (Baker testimony, Tr. 11968/17-11969/5).
- S30. Procedure CPM 6.9 (Baker testimony, Tr. 11969/15-20, 11986/1-11988/23).
- S31. NCR M82-0034, original and all revisions (Applicants' Exhibit 177, page 28, A33).
- S32. Any and all documentation that the welder was terminated immediately (Applicants' Exhibit 177, page 29, A33).
- S33. Any and all documents (in the broad sense of the word, as defined herein) regarding the design change (in approximately February 1980) that redesigned all of the small bore hangers that had been installed prior to that time period, including the I&E Bulletin pertaining to rigid plate assumptions, the new engineering drawings for this type of hangers which indicate that there are presently none of these type hangers for any safety-related systems (Tr. 11785/20-11786/5).
- S34. Any and all documentation regarding testing and test results on tests performed by Welding Engineering early in 1980 (which were initiated for another purpose) which "proved that when welding within the parameters of Welding Procedure 11032, that the interpass temperatures will not be exceeded" (Baker testimony, Tr. 10008/23-10009/1).
- S35. Any and all documentation regarding testing and test results on the effect of excessive interpass temperatures on welding for low carbon steel (Baker testimony, Tr. 10015/1-10019/4).

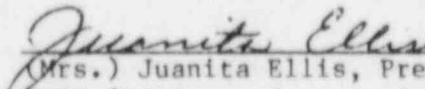
- S36. Any and all documentation regarding testing and test results regarding welding Henry Stiner testified regarding where the excessive heat input and excessive weave welding turned the material blue (Baker testimony, Tr. 10019/11-10024/1, 10024/12-10025/22).
- S37. Any and all documentation (including, but not limited to, daily temperature recordings, Henry Stiner's personnel records (including interim welding authorization) for the days he worked at Comanche Peak during his first period of employment) (Baker testimony, Tr. 10034/15-10035/12, 10138/13-10139/21, and 11760/16-11764/10).
- S38. Any and all documentation (including, but not limited to: the computer printout; all hard copy documentation; any handwritten notes, etc., regarding investigation into which stainless steel welds he had made and the visual examination performed on those attachment welds) for the welder referenced in Mr. Stiner's testimony (Roy Combs) (Baker testimony, Tr. 10036/1-18).

CASE's 5/7/82 11th Set of Interrogatories to Applicants and Requests to Produce:

Questions 3, 25, 26(a), 26(b).

If Applicants believe that there should be a charge for these documents, please call and discuss it with the undersigned in advance of supplying copies.

Respectfully submitted,



(Mrs.) Juanita Ellis, President
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RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED
USNRC

In the Matter of

TEXAS UTILITIES ELECTRIC
COMPANY, et al.
(Comanche Peak Steam Electric
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Docket Nos. 50-445-1⁸⁵ AUG 12 AIO:12
and 50-446-1

OFFICE OF SECRETARY
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BRANCH

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of
CASE's Request for Supplementation of Applicants' Answers to Previous
CASE's Discovery Requests to Applicants

have been sent to the names listed below this early P.M. 8th day of 1st August, 1985,
by: First Class Mail

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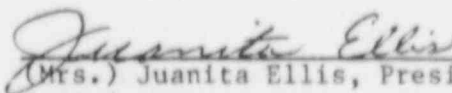
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