

CHAIRMAN  
Alph H. Gelder



*Request revised  
by Telephone call  
between Moskowitz  
and Russell 2/4/80  
WR Russell*

COMMISSIONERS  
Diantha A. Carrigan  
Lincoln Smith

STATE OF MAINE  
PUBLIC UTILITIES COMMISSION  
242 State Street  
State House Station 18  
Augusta, Maine 04333

January 28, 1980

William Russell  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Russell:

Your deposition as corrected, was filed with the Public Utilities Commission on January 23, 1980. Cross-examination is still scheduled for February 11, 1980.

A request for information relating to your testimony has been received from the intervenors, the Maine Committee for Utility Rate Reform. A copy is enclosed.

To expedite the process, please send responses to the Committee's request directly to Mr. Harvey Salgo with a copy to me.

Thank you for your cooperation. Please let me know if you have any questions.

Sincerely,

David H. Moskowitz  
Staff Attorney

DHM/nl  
Enclosure

Adamo, Lee & Salgo, 120 BOSTON STREET, BOSTON, MA 02116 (617) 426-0007

ROSE MARIE ADAMO, Attorney  
VICTORIA A. LEE, Attorney  
HARVEY SALGO, Attorney & Economic Consultant

January 24, 1980

Mr. Joseph G. Donahue  
Hearing Examiner  
Public Utilities Commission  
State of Maine  
242 State House Station 18  
Augusta, Maine 04333

Dear Mr. Donahue,

Please find enclosed copies of the "Information Requests  
of the Maine Committee Directed to Mr. William Russell."  
Copies of the enclosed have been sent to or hand delivered  
to the other parties in this proceeding.

Sincerely,

*Harvey Salgo*  
Harvey Salgo

HS/lb

Enc.

Information Requests of the Maine Committee  
Directed to Mr. William Russell

For purposes of the enclosed requests please note that:

(a) The word "document" as used refers to reports, letters, transcripts memoranda, written comments, telegrams, recorded, transcribed or summarized telephone or "face-to-face" conversations, or other written work, including charts, graphs, and tables.

(b) NRC refers to the Nuclear Regulatory Commission or any of its component divisions or parts, such as Nuclear Reactor Regulation (NRR), for example.

(c) If a proprietary or confidentiality claim is asserted for any of the requested documents or information the attorneys in the Maine Committee are willing to sign an appropriate agreement respecting that (those) claim (s). We will reserve the right, however, to challenge any such claim before the appropriate administrative or judicial bodies.

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The information requests:

1. Please provide a copy of Licensee Event Report (LER) 78-53 which was submitted to NRC Region I on or about October 27, 1978; also provide any subsequent LER--or continuation, update, addition to, or supplement to LER 78-53--concerning the problems or questions with piping stress analysis. With respect to this request, please note the following:

(a) the problems or questions referred to are those found in or about October 1978 at Beaver Valley Power Station Unit 1, and which were the subject of subsequent licensee and NRC concern and review;

(b) this request is for LER's from the licensees of Beaver Valley, Maine Yankee, Fitzpatrick, and Surry 1 and 2;

(c) this request is for LER's which deal with all pipe stress analysis problems or questions in these plants since October 1978 or thereabouts; the request includes, but it is not limited to, the so-called algebraic summation technique for combining intramodal responses.

delete

2. Please provide any documents submitted since October 1978 by the licensees (noted in question 1, above) to the NRC but which are not categorized as LER's, and which deal with pipe stress analysis problems and issues (as described in question 1, above).

2,

ok

3. Please provide any documents from Messrs. Nathan M. Newmark, W.J. Hall, or their associates, to the NRC since October 1978 concerning the algebraic summation technique for combining intramodal responses. Please provide also any documents from the NRC to Messrs. Newmark and Hall, or associates, as described in the preceding sentence.

delete

4. Please provide the information requested in question 3 above, but for documents between the NRC and any other outside consultant.

delete

5. Please provide any documents:

(a) from the NRC Staff to the Commission,  
(b) from any component division (such as NRR), or its director, to the Commission or others on the Staff,

(c) from the Commission to the Staff or to any component division

(d) among members of the Staff,

(e) among members of the Commission,

since October 1978 to the present concerning the algebraic summation technique of combining intramodal responses.

13, <sup>OK</sup> 6. Please provide:

- (a) a copy of Standard Review Plan Section 3.7.2,
- (b) ~~an unedited version of~~ <sup>a copy of the</sup> "Summary of Design Margins and Criteria For Maine Yankee Atomic Power Station."

4, <sup>OK</sup> 7. Please provide any documents in the NRC's possession which are exchanges between Stone and Webster and the 5 licensees noted in question, between October 1978 and the present, concerning:

(a) the algebraic summation technique of combining intramodal responses,

(b) any other pipe stress analysis issues or problems which have arisen since October 1978 including, but not limited to, the problem first "discovered" at Beaver Valley in October 1978 or thereabouts.

5, <sup>OK</sup> 8. In reference to NRC Transcript of Proceedings, "Discussion of Seismic Design Problem in Certain Plants," March 13, 1978, please provide:

(a) any document from the licensee referred to on page 13, line 15 to the NRC which describes, details the reasons for, or simply requests that "we go to NRR." See page 13, lines 13-17;

(b) the Stone and Webster responses indicated on page 15, line 25; any document from the "inspector" to the NRR on February 23 which asked the NRR "to take over the problem." See page 15, line 21 to page 16, line 1;

(c) the nature and substance of the "informal contact between I & E and NRR staff before that to transfer the responsibility...." See page 16, lines 2-4;

(d) any documents which were part of the informal contact prior to February 23 (as noted in (c));

(e) any other document describing the need, reasons, and the like for the transfer of the responsibility to NRR.

<sup>OK</sup> 9.

December 6, 1978 - discussion of LER in chronology. Provide copy of LER + backup report  
78-53/OIT-0.