

September 4, 1985

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION '85 SEP -6 110:29

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
TEXAS UTILITIES GENERATING	)	Docket Nos. 50-445-2
COMPANY, et al.	)	and 50-446-2
	)	
(Comanche Peak Steam Electric	)	
Station, Units 1 and 2)	)	

CASE'S REQUEST FOR DOCUMENT PRODUCTION

Pursuant to 10 CFR 2.741, CASE requests that Applicant produce the following documents for inspection and copying in the manner set forth below:

1). Each document should include all pertinent information known to Applicant, their officers, directors, or employees, their agents, advisors, or counsel. This request is to include all CPRT/SRT documents.

The term "employees" is to be construed in the broad sense of the word, including specifically (but not limited to): Texas Utilities,, et. al. Brown & Root, Gibbs & Hill, Ebasco, Cygna, O.B. Cannon, Cresap, McCormick and Paget, any consultants or subcontractors, and anyone else performing work or services on behalf of the Applicants or their agents or subcontractors and anyone else performing work or services on behalf of the Applicants or their agents or subcontractors. The term employee

refers to all employees performing work for the Applicant, whether or not the Applicant intends to rely upon the information in meeting its regulatory requirements.

2). The terms "documents" and "documentation" shall be construed in the broad sense of the words and shall include any and all writings, graphs, charts, photographs, reports studies, audits, microfiche, slides, internal memoranda, informal notes, handwritten notes, tape recordings, procedues, specifications, calculations, analyses and any other data compilations, from which information can be obtained, including printouts 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.

The term "documents" or "documentation" shall also include any and all minutes of meetings, meeting summaries, meeting agendas, briefing papers or any other similar documentation, any and all other related or similar documents, and all other pertinent information.

3). For each item supplied in response to a request for documents, indentify the specific question number to which it is in response.

4). References to corporations herein also refer to individuals. References to corporations by name include all

parents or subsidiaries of the Applicant, as well as all the minority owners of Comanche Peak.

REQUEST

1. Management and job responsibility changes.

a. All internal documents relating to the structure of key management changes at Comanche Peak beginning January 1, 1979 until present including minutes of all meetings, minutes of briefings of the Board of Directors, the CEO, and other owners of Comanche Peak.

b. All internal documents reflecting the actual changes in management at Comanche Peak, the basis for those changes, and the justification of those changes given to the individuals involved including minutes of all meetings, minutes of briefings of the Board of Directors, the CEO, other owners of Comanche Peak; all the written explanations provided to the individuals removed, transferred, demoted, reassigned, or in any other way affected by management changes.

c. All notes of conversations or summaries or descriptions of conversations since January 1, 1979 between NRC officials recommending or suggesting any management changes, or any dissatisfaction with specific individuals performance or the attitude of management in general.

d. A complete, up-to-date list, including an organizational chart for all contract and sub-contract personnel now doing work on design and/or construction of the Comanche Peak Nuclear Plant.

This should be comprehensive to first line supervisors in both construction and quality assurance/quality control, whether or not the work will be relied upon to meet regulatory requirements.

e. A complete, up-to-date list of the present job of any person who was a witness for Brown & Root or Texas Utilities Company in NRC operating license hearings or Department of Labor wrongful termination proceedings if, at the time they testified, were deposed, or provided affidavits, they worked for any of the Applicants (i.e. owners or contractors) or with subcontractors or consultants at the plant.

f. All documentation, including contracts between Texas Utilities and any other company, setting forth the agreements which govern or control the assignment parameters of all individuals identified in items a through f.

g. The job evaluations, performance ratings, letters of recommendation or, if appropriate, letters of resignation, and any other documents relevant to all personnel changes identified in Items a and c. Where no such document exists but the substance of an evaluation, or the basis for a resignation or termination (transfer, etc.) was provided in the context of a meeting, provide all minutes or notes of those meetings.

h. In addition to Items a-g for any other Applicant witness who has given testimony, depositions, or affidavits, in the proceedings identified in section e above, identify any job or responsibility change and provide all documents relevant to the reason for and nature of the change.

i. For each personnel change identified in any of the above responses provide the new job description, or memorandum of instructions, detailing the scope of responsibility and authority to each individual. Also included in this item is any memorandum, notes, etc. generated by the incoming official setting forth his/her understanding of the job and any instructions, comments, overviews, etc. generated by the new manager to his/her subordinates.

j. Any other document which bears on the overall personnel and management changes from January 1, 1979 to present.

2. Contracting documents.

All contracting documents between any of the Comanche Peak Owners, themselves and other auditing, consulting, construction, or any other type of company related to construction of Comanche Peak.

3. Speeches to workforce regarding organization and management

a. Provide copies or notes of all speeches given by Texas Utilities or Brown and Root management personnel to the Comanche Peak workforce (or any group thereof), since January 1, 1979, including quality assurance/quality control, regarding organizational or management changes at Comanche Peak, including but not limited to Mr. Spence's March/April 1985 speeches to the QC inspectors about the problems and status of the plant.

b. For each communication provide the written record of that communication, any transcripts or notices of speeches or meetings, and all written records of the results of those communications.

4. Documents provided to workforce.

a. All documents and/or other information provided to employees at any time regarding plant safety (not worker safety), federal regulations, and procedures for reporting plant safety violations or deficiencies.

5. Documents regarding status and licensing of plant.

a. All documents provided to the owners or stockholders of the owners which detail the status of the plant, problems at the plant, the status of licensing, and the changes being made to address those problems.

b. All documents provided at meetings and documents of meetings between owners, stockholders, investors, investments advisors, bankers or similar persons who have money invested in CPSES or are being encourage to invest in CPSES which provide explanations about the status of licensing, problems at the plant, status of the plant, or management changes.

c. All documents regarding scheduling and projections for construction including completion dates for Comanche Peak Units 1 and 2 or portions thereof provided to or developed for the NRC Caseload Forecast Panel, the Board of Directors of each of the Comanche Peak Owners, the Security Exchange Commission, Stockholders Meetings, outside consultants, or Public Utilities Commission of the State of Texas.

d. All documents relating to the cost of correcting deficiencies in safety, construction, or design at Comanche Peak as well as costs of CYGNA audits (all phases), the Lobbin Report, the MAC Reports, the EBASCO audit, the INPO Audit, Southern

Engineering Audits, Analyses, Evaluations or Reports, and damage studies, Stone and Webster redesign and analysis work, and any other audits, analysis, reports, evaluations of safety, construction, or design at Comanche Peak.

6. SAFETEAM documents.

a. All documents which relate to the basis for the removal or elimination of the ombudsman position, and any documents which recommend, justify, announce and or explain the replacement of the ombudsman program with the SAFETEAM.

b. The contracts and agreements about the scope of work between the SAFETEAM and Texas Utilities Company and/or Brown and Root, Inc.

c. All written information regarding how the SAFETEAM implements its program; methodology, instructions, training materials, forms used in interviews, interview checklists, etc.

d. All material developed by the SAFETEAM about allegations of harrassment, intimidation, threats or influence from any workers including allegations classified as regarding undesirable work conditions, safety problems and employee pay issues.

7. Status of licensing and scheduling documents.

a. All documents provided to, including all written records of personal or telephonic communication or meetings with, the Department of Energy Task Force on Nuclear Energy relevant to Comanche Peak including the status of licensing, the hearings, and the status of the construction of Comanche Peak.



b. All documents provided to, including all written records of personnel or telephonic communication or meetings with, any person working at or for the White House, including the cabinet level committee on energy issues, relevant to Comanche Peak including the status of licensing, the hearings, and the status of the construction of Comanche Peak.

c. All documents provided to, including all written records of personal or telephonic communication or meetings with, the Department of the Treasury's Task Force on Nuclear Energy relevant to Comanche Peak including the status of licensing, the hearings, and the status of the construction of Comanche Park.

d. All documents provided to, including all written records of personal or telephonic communication or meetings with, Senator Thomas Bevill, Congressman Morris Udall, Congressman James Bryant, Congressman James Wright, and any other members of Congress or the Texas state legislature or their staff, about the status of licensing, the hearings, and the status of the construction of Comanche Peak.

e. All documents provided to, including all written records of personal or telephonic communication or meetings with, Victor Stello and/or Harold Denton about the status of licensing, the hearings, and the status of the construction of Comanche Peak.

f. All documents provided to, including all written records of personal or telephonic communication or meetings with William Dircks about the status of licensing, the hearings, and the status of the construction of Comanche Peak.



g. All documents provided to, including all written records of personal or telephonic communications or meetings with, any of the NRC Commissioners or any member of their staff about the status of licensing, the hearings, proposed site visitations, and the status of the construction of Comanche Peak.

8. TRT evaluations.

a. All documentation prepared by, or for, or under the control of the CPRT or CPSES that relates to review of the TRT findings, beginning with any such documents generated in response to the September, 1984 letter from the TRT to TUEC on electrical problems, and including the October, 1984, November, 1984 and January 11, 1985 letters, and the subsequently issued SSER Nos. 7, 8, 9, 10 and 11 this includes all documents prepared for or as a result of any meetings with any representatives of the TRT).

b. All CPRT documents which address the validity, significance, and generic impact of all the TRT findings.

9. CYGNA documents re: QA/QC program.

All documents (including CPRT) which evaluate, report, assess, analyze or detail the CYGNA Corporation's Phase IV findings with regard to QA/QC issues (i.e., CYGNA's finding that the cause of the design review problem was with the reviewers, not the procedures, but couldn't explain why the reviewers, weren't doing their job), or CYGNA's inability to determine why the design document control system broke down.

10. Contractor information.

a. All documentation, including contracts between Comanche Peak Owners or other subcontractors (such as EBASCO) which defines the scope of the assignments of contract personnel who have been retained by the owner or any one of them to provide assistance of any sort in resolving QA/QC or hardware concerns identified by the NRC--i.e., all contractors hired after March 19, 1984 up to and including the present.

b. The contract and all other documents related to the scope of responsibility of Daniels International at Comanche Peak.

c. The contract and all other documents related to the scope of responsibility of Stone and Webster at Comanche Peak.

d. The contract and all other documents related to the scope of responsibility of TERA Corporation at Comanche Peak.

e. The contract and all other documents related to the scope of responsibility of Evaluation Research Corporation at Comanche Peak.

f. The contract and all other documents related to the scope of responsibility of Monty Wise, Inc. at Comanche Peak.

g. The contract and all other documents related to the scope of responsibility of any other independent contractor and/or consultant at Comanche Peak.

h. All documentation that explains the relationship between all of the subcontractors identified in response to any question above and Comanche Peak Owners.

11. Scheduling forecasts.

All documents which contain scheduling forecasts for implementation of any reinspection or corrective action program which were provided to outside consultants, the Securities Exchange Commission, the Department of Energy, and bond broker or other investors, potential investors or investment advisers the Board of Directors, other owners of Comanche Peak, any other government agency, or any state or local officials or employees.

12. MAC Report

a. Copies of all contracts between MAC and Applicant or any of its subcontractors, beginning in 1976.

b. Copies of all documents reports, audits, analysis, letters, correspondence, etc. provided by MAC to Applicant or any of its contractors beginning in 1976.

These include copies of the MAC audits of Brown and Root QA Program referred to in BN 85-076, Aug 16, 1976.

c. The notes, records, logs, memorandums of Mr. Andrew S. Jones, senior auditor of TUSI.

d. Produce and identify all other "outside perspectives", which TUGCO or any of its managers received on Comanche Peak, regardless of whether or not TUGCO intended to rely upon the review to meet NRC regulatory requirements.

13. T-Shirt Incident/Electrical QA/QC

Produce all documents developed since 1 July 1984 regarding the T-Shirt incident, or the Post Construction Verification Task Force, including any further investigations into destructive

examinations, or an explanation for the lack thereof. Include any review of the implications of the T-shirt incident on the workforce.

14. Liner Plate/QA/QC

a. Produce the results and all bases of the TUEC investigation/inspection into the liner plate documentation breakdown announced in December 1984 during the testimony of C. Thomas Brandt.

b. Produce all documents developed since 1 July 1984 regarding the liner plate QA/QC breakdown.

15. Paint Coatings/QA/QC

a. Produce all documents related to the analysis of the paint coatings/QA/QC program, and the failure of the paint coatings QA/QC program to detect programmatic deficiencies.

b. Produce all documents related to the analysis of the QA/QC management, including but not limited to the handling of the concerns of Messrs. Bill Dunham, Bob Hamilton, and Cory Allen.

16. Harassment and Intimidation

a. Produce all documents which detail the disposition of the allegations of harassment and intimidation of both craft and QC personnel.

b. Update all past discovery requests (re: harassment and intimidation) to include the same information for craft personnel (including but not limited to documentation personnel).

c. Produce all documentation which analyzes the harassment and intimidation concerns of any worker for management (CPRT or CPSES).

Pursuant to 10 C.F.R. 2.741(d) answers to this document request must be provided within 30 days of the date of receipt of this pleading.

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