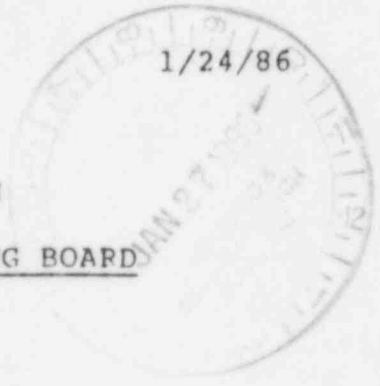


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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:
COMMONWEALTH EDISON COMPANY

(Braidwood Nuclear Power
Station, Units 1 and 2)

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Docket Nos. 50-456
50-457

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ROREM, ET AL., QUALITY ASSURANCE
INTERROGATORIES AND REQUESTS TO PRODUCE, THIRD SET

Pursuant to 10 CFR Sections 2.720(h)(2)(ii), 2.740b, 2.741 and 2.744, Bridget Little Rorem, et al., ("Intervenors") hereby serve their Quality Assurance Interrogatories and Requests to Produce, Third Set, upon the Applicant and the NRC Staff. These interrogatories involve Intervenors' amended quality assurance contention admitted June 21, 1985.

Each interrogatory should be answered fully in writing, under oath or affirmation, and include all pertinent information known to the NRC Staff and the Applicant, including their officers, directors, employees, agents, advisors or counsel. Each request to produce applies to pertinent documents which are in the possession, custody or control of the NRC Staff and the Applicant, including their officers, directors, employees, agents, advisors or counsel. In answering each interrogatory and in responding to each request, please recite the interrogatory or request preceding each answer or response. Also, please identify the person providing each answer or response.

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These interrogatories and requests shall be continuing in nature. Thus, whenever information is obtained which renders any previous response incorrect or indicates that a response was incorrect when made, a supplement should be made to the previous response to the appropriate interrogatory or request to produce. Supplements should be made to the responses as necessary with respect to identification of each person expected to be called at the hearing as an expert witness, the subject matter of his or her testimony, and the substance of that testimony. Intervenors are particularly interested in the names and areas of expertise of witnesses, if any. Such identification of witnesses is necessary if Intervenors are to be afforded adequate time to depose them.

The term "documents" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. Intervenors request that at a date or dates to be agreed upon, the NRC Staff and the Applicant make available for inspection and copying, all documents subject to the requests set forth below.

REQUESTS TO PRODUCE

Pursuant to 10 CFR Sections 2.741 and 2.744, Intervenors request that the NRC Staff and Applicant make available for inspection and copying at a time and location to be designated, but as soon as possible, any and all documents, of whatsoever description, identified in the responses to the interrogatories below, including but not limited to:

- (1) any written record of any oral communication between or among Applicant, the NRC Staff, either of their contractors, advisors, consultants, agents, attorneys and/or any other persons, including but not limited to the NRC Staff, Applicant, Intervenor, and their advisors, consultants, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letter, memorandum, notes, diagrams, reports, charts, photographs, or any other writing of whatsoever description, including but not limited to workpapers, prior drafts, and notes of meetings.

If NRC Staff and/or Applicant maintain that any documents should not be made available for inspection, they should specify the documents and explain why such are not being made available. This request extends to any such document, described above, in the possession of Applicant, NRC Staff and their advisors, consultants, agents or attorneys.

Since Applicant has asserted that time is of the essence in this proceeding, any expedited responses to these interrogatories and document requests will inure to its benefit. Similarly, the production of documents for inspection and copying in Chicago at the offices of Applicant's counsel instead of at the distant Braidwood site will facilitate Intervenor's review and save hearing preparation time.

INTERROGATORIES

Pursuant to 10 CFR Sections 2.740b, 2.720(h)(2)(ii), Intervenor requests NPC Staff and Applicant, by and through their attorneys, to answer separately and fully in writing under oath or affirmation, by persons having knowledge of the information requested, the following interrogatories:

A. General Interrogatories

The following interrogatories apply severally to each part of the quality assurance contention admitted as issues in controversy in this proceeding.

1. Please state the full name, address, occupation and employer of each person answering the interrogatories or assisting in the preparation of such answers, and designate the interrogatory or the part thereof he or she answered.

2. Please identify each and every person whom you are considering to call as a witness at the hearing in this matter on this contention, and with respect to each such person, please:

- a. State the substance of the facts and opinions to which the witness is expected to testify;
- b. Give a summary of the grounds for each opinion; and
- c. Describe the witness' educational and professional background.

3. Is your claim or defense on the contention based on one or more calculations? If so:

- a. Describe each calculation and identify any documents setting forth such calculation.
- b. Who performed each calculation?
- c. When was each calculation performed?
- d. Describe each parameter used in such calculation and each value assigned to the parameter, and describe the source of your data.
- e. What are the results of each calculation?
- f. Explain in detail how each calculation provides a basis for your claim or defense.

4. Is your claim or defense on the contention based upon conversations, consultations, correspondence or any other type of communications with one or more individuals? If so:

- a. Identify by name and address each such individual.
- b. State the educational and professional background of each individual, including occupation and institutional affiliations.
- c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
- d. Describe the information received from such individuals and explain how it provides a basis for the issue.
- e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence, or other communication with such individual.

B. Specific Interrogatories

1. In a May 7, 1984, letter to Commonwealth Edison transmitting Inspection Report 83-09, NRC Region III Administrator James G. Keppler observed that "[A] major factor contributing to the deficiencies were inadequate contractor programs and workmanship, inadequate licensee reviews of the contractor programs, and inadequate licensee quality assurance overview to ensure contractor activities met all requirements." What were the basic, or root causes, or reasons for the occurrence of the inadequacies identified in Mr. Keppler's letter, specifically the inadequate contractor programs and workmanship? The inadequate licensee reviews of the contractor programs? The inadequate licensee quality assurance overview to ensure contractor activities met all requirements?

2. Describe in detail any and all studies, inquiries, investigations or reviews undertaken to determine the validity of the observations of inadequacies made by Mr. Keppler as described in Interrogatory No. 1 above. Describe in detail any results and conclusions.

3. Describe in detail any and all studies, inquiries, investigations or reviews undertaken to determine the basic or root causes, or reasons for the occurrence of the inadequacies identified in Mr. Keppler's letter as described in Interrogatory No. 1, above.

4. In a February 2, 1983, letter to Commonwealth Edison transmitting Inspection Report 82-05, NRC Region III Administrator James G. Keppler observed that "[T]he results of the inspection indicate serious weaknesses in your management control systems as evidenced by a breakdown in your quality assurance (QA) program as it relates to the installation and installation inspection of mechanical safety-related equipment." What are the basic, or root causes, or reasons for the "serious weaknesses" and "breakdown of your quality assurance (QA) program" identified by Mr. Keppler?

5. Describe in detail any and all studies, inquiries, investigations or reviews undertaken to determine the validity of the observations of "serious weaknesses" and "breakdown" made by Mr. Keppler as described in Interrogatory No. 4, above. Describe in detail any results and conclusions.

6. Describe in detail any and all studies, inquiries, investigations or reviews undertaken to determine the basic or root causes, or reasons for the occurrence of the "serious weaknesses" and "breakdown" identified by Mr. Keppler as described in Interrogatory No. 4 above.

7. In the NRC Staff First Response to Intervenor's Second Set of Interrogatories, November 15, 1985, pp. 5-7, in answer to Interrogatory No. 1, regarding contention sub-part 1B, the

NRC Staff identifies "measures to strengthen the managerial effort of its contractors," and "extensive commitments to resolve the issues" identified in the second paragraph of sub-part 1B, on the part of applicant. Please describe in detail these "measures" and "commitments," explain why they were believed to be effective to correct the problems identified by the NRC, and identify and produce any and all documents which reflect your answers including but not limited to the documents identified by the NRC Staff in the answer described above.

8. Describe in detail any and all studies, inquiries, investigations or reviews undertaken, and any results or conclusions, to determine the validity of and the basic, or root cause, or reason for the occurrences described in Inspection Report 82-05 at pages 8 and 9, in particular the "mechanical damage" to the "steam generator support bolts," the use of "hydraulic torque wrenches, pneumatic operated impact wrenches, a six foot pipe extension handle on hand held wrenches (a so-called "cheater bar") to install the bolts, and any identification of or reporting of such occurrences by concerned workers. Please identify any and all documents related to your answers.

9. With respect to Interrogatories 58 and 59 of Intervenors' First Set and Interrogatories 1 through 7 of Intervenors' Second Set, please provide any supplementation necessary in order to make your answers current and complete. Please identify any and all documents related to such supplementation.

10. Please identify and describe in detail any and all studies, inquiries, reviews or evaluations of the effectiveness of, results and conclusions of the Braidwood Construction Assessment Program (BCAP); the "top twenty" corrective action programs at Braidwood identified in the April 8, 1985, correspondence from David H. Smith to James G. Keppler; and the "Ongoing Corrective Action Program" identified in Appendix B to the BCAP June 1984 program description transmitted by James J. O'Connor to James G. Keppler by letter of June 22, 1984. As to each please detail the purpose and objectives, organization, methodology, procedures, staffing, implementation, results and conclusions of each. Please identify any documents which reflect these answers.

11. Please identify and make available for inspection and copying any and all documents which relate to the corrective actions and programs described in response to Intervenor's Second Set of interrogatories served October 21, 1985. In its November 15, 1985, First Partial Response Applicant stated that "an index of numbered documents" related to the Material Traceability Verification and Corroded Pipe" corrective action programs would "be provided in the near future," p. 2. Intervenor's are unaware of any document identification or index for these or any other corrective action program except BCAP.

12. Describe every oral or written communication which officers and directors and managers of Commonwealth Edison Company (including but expressly not limited to Chairman James O'Connor and Quality Assurance Manager Walter Shewski) have had which refer or relate to each or any subpart of the Intervenor's quality assurance contention, the underlying NRC findings or observations, or the quality assurance program at or for the Braidwood nuclear station.

As to each oral communication state:

- a. the date;
- b. whether the communication was on the telephone or in person;
- c. the subject matter of the communication; and
- d. the identity of all persons participating therein.

As to each written communication or memorandum or document reflecting an oral communication state:

- a. the date;
- b. the author and addressee;
- c. the subject matter;
- d. the length in pages;
- e. the location and custodian.

Please make available any such written communication or memorandum of oral communication for inspection and copying.

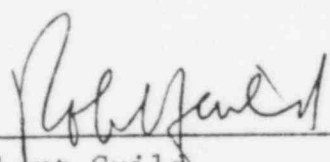
You may exclude all such communications to or from Intervenor's counsel or in which Intervenor's counsel have participated.

13. Describe in detail any and all work performed by Torrey Pines Technology, or other organization of similar name, with respect to quality assurance at Braidwood, the subjects of Intervenor's quality assurance contention, or any corrective action program including but not limited to the Safety-Related Mechanical Equipment corrective action program. As to such work please detail the purpose and objectives, organization, methodology, procedures, staffing, implementation, results and conclusions. Please identify any documents which reflect these answers and make available such documents for inspection and copying.

14. Please describe in detail the factual basis for Commonwealth Edison Company's forecasts, projections or estimates of construction schedule and completion including fuel loading and start-up testing for Braidwood Units 1 and 2, including but not limited to any such forecasts, projections or schedules provided to the Licensing Board, Appeal Board, Commission or Commission Staff. Please describe fully the methodology, assumptions and factual data relied upon in sufficient detail to permit independent verification and replication of Edison's results and conclusions. Please identify and make available for inspection and copying any and all documents which reflect these answers.

DATED: January 24, 1986

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By: Robert Guild
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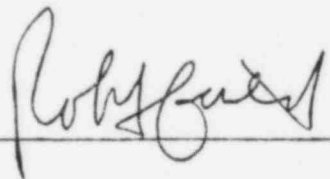
UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

In the Matter of:)	
)	
COMMONWEALTH EDISON COMPANY)	Docket No. 50-456
)	50-457
(Braidwood Nuclear Power)	
Station, Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that I have served copies of Forem, Et Al., Quality Assurance Interrogatories and Requests To Produce, Third Set, on each party to this proceeding as shown on the attached Service List, by having said copies placed in envelopes, properly addressed and postaged (first class), and deposited in the U.S. mail on this 24th day of January, 1986, except that Mr. Miller was served personally and Mr. Treby was served via Federal Express overnight delivery.



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