

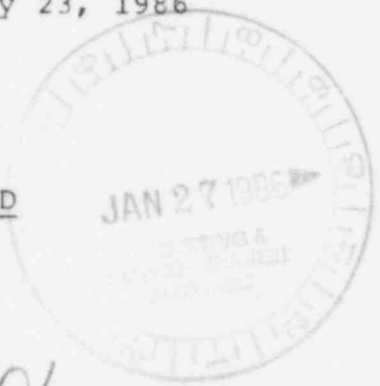
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RELATED CORRESPONDENCE

January 23, 1986

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))

Docket No. 50-456
50-457

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**** ~~CONTAINS/CONFIDENTIAL/INFORMATION~~ **** */

REPONSE TO APPLICANT COMMONWEALTH EDISON COMPANY'S
SECOND SET OF QUALITY ASSURANCE INTERROGATORIES
AND REQUESTS TO PRODUCE DOCUMENTS
DIRECTED TO INTERVENORS BRIDGET LITTLE FOREM, ET AL.
AND MOTION FOR PROTECTIVE ORDER

Intervenors Bridget Little Forem, et al., by their under-
signed counsel hereby respond to Applicant Commonwealth Edison
Company's Second Set of Quality Assurance Interrogatories and
Requests to Produce Documents, which were served January 9, 1986.
Pursuant to 10 CFR Section 2.740(c), Intervenors move for the
entry of a protective order as to each interrogatory and request
for production of documents, or portion thereof, to which they
herein object. As the Board has previously directed and as the
parties have previously undertaken, Intervenors will endeavor to

*/ Disclosure of confidential information is strictly limited as
provided in the December 6, 1985, Protective Order entered by
the Atomic Safety and Licensing Board in this proceeding.
Confidential information contained in this document is set
off by brackets [].

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negotiate and resolve discovery disputes including our objections prior to seeking a ruling from the Board on the Motion For Protective Order.

By way of introduction Intervenor note that thirteen of the fourteen interrogatories posed in this "second set" are identical to those interrogatories served August 16, 1985, and identified as "Applicant Commonwealth Edison Company's First Set of Quality Assurance Interrogatories and Requests To Produce Documents Directed to Intervenor Bridget Little Porem, Et Al." As Applicant no doubt expects, Intervenor's responses here are, thus, virtually the same as those provided in our August 16, 1985, Response and Motion for Protective Order regarding Applicant's first set of interrogatories.

As we understand from Applicant's counsel the principal purpose of the second set of interrogatories is to seek updated information with respect to the identities of persons raising Quality Control inspector harassment and intimidation claims.

Intervenor had objected to disclosing names or other identifying information regarding certain Comstock QC inspectors who sought confidential treatment of such information in this proceeding. Response, August 16, 1985, pp. 6, 11-21. The Licensing Board subsequently entered a Protective Order December 6, 1985, providing for the limited disclosure of such confidential information. Intervenor here disclose confidential information sought by Applicant's interrogatories as provided for in the Board's Protective Order.

Applicant seeks the production of documents from Intervenor

for inspection and copying. Documents identified in the answers to the following interrogatories, except those which are privileged, will be made available for inspection and copying at counsel's office in Chicago, Illinois, at a time to be agreed upon. In the course of preparing for the litigation of this contention, advising and communicating with intervenors and others, documents are prepared by counsel or at counsel's direction which are privileged and not subject to discovery pursuant to 10 CFR Section 2.740(b)(1). Such documents as trial preparation materials are subject to a work product privilege and an attorney-client privilege protects from disclosure the mental impressions and opinions of counsel. 10 CFR §2.740(b)(2). Such documents as handwritten notes, memoranda and other documents prepared by Intervenor's counsel or at counsel's direction are privileged and protected from disclosure. Intervenor's object to the production of such documents and ask the Board to enter an order protecting such materials from disclosure.

Q1: Describe every oral communication which you have had which refers or relates to each subpart of the contention by:

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

You may exclude all such communications in which counsel for Staff and/or Applicant participated.

A1: This interrogatory impermissibly seeks the description of "every" oral communication "which refers to relates to" the subparts of the contention participated in by Intervenor's "attorneys, including all employees of BPI." Intervenor's object to the description of communications which are exempt from discovery as attorney-client and attorney work product privileged information. Oral communication by and among Intervenor's counsel, counsel's employees, agents and advisors, Intervenor's, and persons seeking legal advice are protected from discovery. 10 CFR §2.740(b)(1) and (b)(2); Rule 26(b)(4), Federal Rules of Civil Procedure. To the extent Applicant seeks communications by "Stanley Campbell and Diane Chavez" as included in the definition of the terms, "you and your," Intervenor's object on relevance grounds since neither Mr. Campbell nor Ms. Chavez are parties to this proceeding and no communication between them and counsel is relevant to the Quality Assurance issues. Aside from oral communication in which counsel (or counsel's employees and agents) were participants, no other communication is believed to have occurred as sought by this interrogatory.

Counsel for Intervenor's have had oral communications with a number of prospective expert consultants and advisors, none of whom are presently expected to be called as witnesses at trial. Intervenor's object to disclosing the identities of these persons or the content of the communication(s) with them. 10 CFR §2.740(b)(2); Rule 26(b)(4), Federal Rules of Civil Procedure.

Intervenor's counsel have had oral communications with a

number of present and former Braidwood site employees. In light of the serious claims involving harassment and intimidation of such site employees, Intervenors are concerned that simply disclosing the existence of such communications with counsel for Intervenors may subject such persons to reprisal or fear of reprisal which, at the least, may have a chilling effect on their willingness to cooperate with Intervenors and participate in this proceeding. The names of confidential prospective witnesses are disclosed below pursuant to the terms of the Board's December 6 Protective Order. Such confidential information is set out in brackets and is to be disclosed only as provided in the Protective Order. Intervenors object to describing such oral communications with counsel since such communications are not discoverable. Applicant can interview such persons itself to obtain the same information.

The following oral communications are identified in which counsel for Intervenors participated:

- | | |
|---|-------------------|
| 1. July 9-14, August 31, October 18, November 3, 1985 | John D. Seeders |
| 2. July 9-10, October 18, 1985 | Worley O. Puckett |
| 3. July 9, 1985 | Lee Hornberger |
| 4. July 15, 1985 | Frank Martorana |
| 5. July 24, 30, 1985 | L.G. McGregor |
| 6. July 14, 29, 1985 | Dan Holley |
| 7. July 29, 1985 | Richard Snyder |
| 8. July 30, 1985 | Tim Stewart |
| 9. July 31, 1985 | Herschel Stout |

10. August 1, 1985
11. August 1, October 18, 1985
12. July 31, 1985
13. August 1, November 18, 198
January 5, 1986
14. July 31, 1985
15. August 2, 1985
16. July 30, November 18, 1985
17. August 2, 1985
18. August 1, 1985
19. August 1, 1985
20. July 31, 1985

R.D. Hunter

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

On May 17 and 24, 1985, counsel had oral communications with an unknown person who had knowledge of facts relevant to the amended QA contention. Intervenor's object to describing such communication since a description may serve to identify this person who clearly desired and sought anonymity. The nature of the communication persuades Intervenor's that the person has a legitimate interest in remaining anonymous.

Q2: Identify the documents in your possession prior to the admission of the contention which refer or relate to each subpart of the contention and identify each person supplying you with each document.

A2: The pleadings and exhibits previously served upon Applicant and filed in this proceeding refer or relate to the contention. The documents identified as exhibits to these pleadings were supplied by the NRC Staff in the case of inspection

reports, by the Court Reporter in the case of the Keppler-Warnick Deposition and the Keppler Byron testimony, the Chicago Tribune in the case of the article quoting Mr. Keppler, and by Applicant in the case of the several Commonwealth Edison documents. Other documents consist of attorney work product and attorney-client privileged materials the identification and production of which is objected to. In addition, counsel for Intervenor received documents believed to be from the anonymous individual referred to in Interrogatory 1, above. Intervenor declines to describe or produce such documents since they would likely provide identifying information which would compromise this individual's anonymity.

Q3: Identify each individual and organization with "quality assurance expertise" whom you have consulted concerning Braidwood and identify each document which refers to or relates to such consultation.

A3: Intervenor objects to disclosing the identities of or substantive communication from the persons with QA expertise referred to, where none of these persons are, at present, expected to be called as witnesses at trial. 10 CFR §2.740(b)(2); Rule 26(b)(4), Federal Rules of Civil Procedure.

Q4: Define the word "breakdown" as it is used in the contention.

A4: Intervenor employs the word "breakdown" as a term of art with the same meaning as is attached to the word by the NRC as, for example, in 10 CFR Section 50.55(e) and in the Atomic

Safety and Licensing Appeal Board decision in the Callaway case, ALAB 740, 18 NRC 343 (1983).

Q5: For each subpart of the contention describe the corrective action which has been or is being implemented to correct the deficiency described therein.

A5: Intervenors answered this question with respect to corrective action regarding each deficiency cited in each subpart of the contention in our August 1, 1985, Response to the NRC Staff's July 12, 1985 Interrogatories. We reiterate such answers at this time. Such answers were provided in response to Interrogatories 3, 4, 8, 9, 12, 13, 16, 17, 22, 23, 26, 27, 30, 31, 34, 35, 38, 39, 42, 43, 46, 47, 50, 51.

Further descriptions of asserted corrective actions are contained in Applicant's August 27, 1985, Sixth Partial Response to Intervenors' first set of interrogatories, answers to specific interrogatories 58 and 59; and in Applicant's November 15, 1985 First Partial; November 22, 1985 Second Partial; December 6, 1985 Third Partial; and December 12, 1985 Fourth Partial Responses to Intervenors' second set of interrogatories. A final report on Applicant's Material Traceability Verification Program was transmitted November 15, 1985. A first report on Applicant's Braidwood Construction Assessment Program was transmitted November 18, 1985. A final report on the Corroded Pipe Problem was transmitted January 10, 1986. A written program description and partial results of the Safety-Related Mechanical Equipment Retrofit Program were transmitted January 13, 1986.

Q6: For each corrective action identified in answer to Interrogatory 5, state whether you believe the corrective action has been or will be, if implemented in accordance with its description, effective in rectifying the specified quality assurance deficiency. If your answer is negative, describe fully the particulars in which the corrective action is asserted to be ineffective, the basis for each such assertion and identify all documents which refer or relate to your answer.

A6: Intervenor's answered this question with respect to corrective action regarding each deficiency cited in each subpart of the contention in our August 1, 1985, Response to the NRC Staff's July 12, 1985 Interrogatories. We reiterate such answers at this time. Such answers were provided in response to Interrogatories 3, 4, 8, 9, 12, 13, 16, 17, 22, 23, 26, 27, 30, 31, 34, 35, 38, 39, 42, 43, 46, 47, 50, 51.

Intervenor's are unable at this time to form an opinion on the effectiveness of these asserted corrective actions prior to their completion, their review by the NRC and the completion of discovery regarding such actions.

Q7: State whether you will contend at the hearing that the specific factual occurrences set forth in the contention exhibit an asserted pattern of quality assurance deficiencies on any common basis other than the specified criterion of 10 CFP Part 50, App. E set forth in the contention. If so, describe each such common basis for an asserted pattern of quality assurance deficiencies and identify any documents which refer or

relate to such common basis.

A7: This interrogatory appears to seek the disclosure of the legal opinions or theories of Intervenor's counsel and, as such, it is objectionable as addressed to privileged attorney work product. It also prematurely would require Intervenor to take a position on such legal theories before we have had an adequate opportunity in discovery to ascertain evidence of common bases and patterns. Even at this stage, however, evidence of such patterns and common bases have been identified, for example, by NRC Regional Administrator James G. Keppler who observed that such serious deficiencies were a product of Applicant's management being "spread thin at the top." February 1, 1984, Chicago Tribune, "Will County A-Plant Faulted - 'Worse' Than Byron."

Further, in his May 7, 1984, letter to Applicant Mr. Keppler stated 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."

Q8: Define the words harassment, intimidation, retaliation and discrimination as used in the Joint Stipulation on Quality Control ("QC") Inspector Harassment Contention ("Joint Stipulation").

A8: The terms harassment, intimidation, retaliation and discrimination as used in the contention, collectively represent policies, practices, acts or omissions by Commonwealth Edison or its contractors intended to or having the effect of

impeding, interfering with, or improperly influencing the performance of quality assurance duties by Braidwood site employees. Such conduct includes discrimination as defined and prohibited under the Employee Protection provisions of the Energy Reorganization Act, 42 USC Section 5851 and 10 CFR Section 50.7, and pressure to sacrifice quality and safety interests out of cost and schedule considerations.

Q9: Describe each instance of (A) harassment and (B) intimidation either (1) carried out or (2) participated in by Irv DeWald, Larry Seese, Bob Seltman and R.M. Sakalac and for each such instance:

- a. identify the QC inspector or other Comstock employee allegedly harassed or intimidated;
- b. identify the Comstock supervisor involved;
- c. describe the quality or safety concern expressed by the QC inspector or other Comstock employee;
- d. state whether the quality or safety concern was resolved and if so, describe its resolution;
- e. state the date of each such instance; and
- f. identify documents which refer or relate to each such instance.

A9: 1. a. John D. Seeders
b. Sakalac, Seltman, Seese, DeWald
c. complained about harassment in connection

with his QC duties as described in his August 17, 1984 letter and his November 4 and 5, 1985 deposition

- d. not resolved
 - e. in August 1984, subsequently involuntarily transferred out of QC
 - f. August 17, 1984 letter
- 2.
- a. Worley O. Puckett
 - b. Marino, DeWald
 - c. improper construction procedures, improper qualification of welders, material traceability deficiencies; recommended complete stop work order for all welding activity, as further described in his December 6, 1985 deposition
 - d. not resolved
 - e. May-August 1984
 - f. see, documents attached to July 12, 1985, Motion To Admit Claims of Intimidation and Harassment of Comstock Quality Control (QC) Inspectors and identified in his December 6, 1985 deposition
- 3.
- a. Rick Snyder
 - b. Sakalac
 - c. refused to close out inspection document with open engineering change notice
 - d. March 28, 1985

- e. not resolved
- f. April 5, 1985 NRC Memo
- 4. a. [REDACTED]]
 - b. John Walters, Ken Worthington
 - c. told he'd be discriminated against if he did not produce more inspections; work with blinders on
 - d. unknown
 - e. unresolved
 - f. April 5, 1985 NRC Memo
- 5. a. R.D. Hunter
 - b. more than one supervisor
 - c. more than a little bit of intimidation
 - d. unknown
 - e. not resolved
 - f. April 5, 1985 NRC Memo
- 6. a. [REDACTED]
 - b. Sakalac, other Comstock management
 - c. told to finish an inspection even though drafting errors noted
 - d. not resolved
 - e. November 5, 1984
 - f. April 5, 1985 NRC Memo
- 7. a. [REDACTED]
 - b. John Walters, Daryl Landers
 - c. observed base metal reduction; Walters told him not to worry; Landers said to

keep production up

- d. unknown
 - e. unknown
 - f. April 5, 1985 NRC Memo
- 8.
- a. Herschel Stout
 - b. unknown
 - c. production overrides quality
 - d. not resolved
 - e. unknown
 - f. April 5, 1985 NRC Memo
- 9.
- a. [REDACTED]
 - b. unknown
 - c. quantity first, not quality
 - d. not resolved
 - e. unknown
 - f. April 5, 1985 NRC Memo
- 10.
- a. [REDACTED]
 - b. Sakalac, DeWald
 - c. Sakalac berates inspectors; DeWald has discriminated against many inspectors; attitude is "how can I hang you"
 - d. not resolved
 - e. unknown
 - f. April 5, 1985 NRC Memo
- 11.
- a. [REDACTED]
 - b. Sakalac
 - c. Sakalac lied to get him fired; Sakalac

used forms contrary to procedure;
constantly being watched; involuntarily
transferred after visiting NRC office

- d. not resolved
 - e. unknown
 - f. April 5, 1985 NRC Memo
12. a. [REDACTED]
[REDACTED]
- b. unknown
 - c. hangers not inspected, just as-built; no
inspection report on nonconformances writ-
ten; walkdowns done, drawings made to show
as-built configuration
 - d. not resolved
 - e. unknown
 - f. April 5, 1985 NRC Memo
13. a. [REDACTED]
[REDACTED]
- b. unknown
 - c. more money for more certifications; can't
remain proficient in all areas; quality
goes down
 - d. not resolved
 - e. unknown
 - f. April 5, 1985 NRC Memo
14. a. Dan Holley
- b. unknown

- c. Sam Russman both QC inspector and auditor
 - conflict of interest
 - d. unknown
 - e. unknown
 - f. April 5, 1985 NRC Memo
15. a. Inspector "X" (believed to be [REDACTED])
[REDACTED]
- b. Sakalac
 - c. told X to close out ICR's without going through engineering; Sakalac threatened him; "I can put you in the vault;"
Inspector X says that everyone knows about Sakalac, but nothing is ever done.
Tells me what to do though not certified; isn't qualified; just done to get the paper work complete
 - d. not resolved
 - e. unknown
 - f. March 29, 1985 NRC Memo
16. a. "another individual"
- b. Sakalac
 - c. knows of at least 5 guys Sakalac has jumped on; nothing gets done; telling inspectors what to do when he's not certified in area; railroaded John out; new leads in who can't answer questions in their areas but will sign off NCR's or

ICR's without appropriate disposition;
told to keep numbers of NCR's and ICR's
down; interested in numbers and not
quality; wrote up guy who didn't have
enough numbers; Quality First program
sucks, hasn't done a damn bit of good;
threw me out of inspecting cable pans -
too many NCR's; engineers signed off - no
problem. Out of 100 hangers last week all
but one or two no good. Supervisor wanted
me to close out several ICR's - not
certified in my area. Sakalac pressured
me to close them out; going to weed
out inspectors based on production, not
quality.

- d. not resolved
 - e. unknown
 - f. March 29, 1985 NRC Memo
17. a. "individual"
- b. Sakalac
 - c. new people just closing out documents
without inspections; afraid of Sakalac; no
training; complained to CEC Co about "use as
is" disposition of NCR's to avoid re-work;
one person completed 93 hangers with 1,114
welds in one day; improper QA auditing
 - d. not resolved

- e. unknown
- f. March 29, 1985 NRC Memo
- 18. a. Inspector A
- b. unknown
- c. new hires will complete paperwork; "get the job done"
- d. not resolved
- e. unknown
- f. March 29, 1985 NRC Memo
- 19. a. Inspector B
- b. unknown
- c. in 15 years of inspecting, first nuclear job where quantity first, not quality
- d. not resolved
- e. unknown
- f. March 29, 1985 NRC Memo
- 20. a. Inspector C
- b. Sakalac
- c. gave up lead position because of intimidation; Sakalac uses extreme profanity; attitude is how can I hang you not help you
- d. not resolved
- e. unknown
- f. March 29, 1985 NRC Memo
- 21. a. Inspector D
- b. Sakalac

- c. no overtime unless production increased;
Sakalac threatened inspector to sign off
ICR
 - d. not resolved
 - e. unknown
 - f. March 29, 1985 NRC Memo
- 22.
- a. Inspector E
 - b. unknown
 - c. intimidation far worse than one supervisor
or lead
 - d. not resolved
 - e. unknown
 - f. March 29, 1985 NRC Memo
- 23.
- a. Inspector F
 - b. Sakalac
 - c. many run-ins with Sakalac; demanded he
write up electrician or lose qualification
 - d. not resolved
 - e. unknown
 - f. March 29, 1985 NRC Memo
- 24.
- a. Inspector G
 - b. unknown
 - c. being watched; they are keeping book so
they can fire me
 - d. not resolved
 - e. unknown
 - f. March 29, 1985 NRC Memo

25. a. all inspectors present
- b. unknown
- c. quantity first, quality work or inspections were secondary
- d. not resolved
- e. unknown
- f. March 29, 1985 NRC Memo

Q10: Describe each effect of Mr. Sakalac's alleged harassment which remains uncorrected, identify each person on whom each such effect has operated and identify all documents which refer or relate to each effect.

A10: The effect of the widespread harassment misconduct by Mr. Sakalac is to undermine the integrity of all of the inspection work performed by those who worked under his supervision or subject to his influence. All inspection documents executed by such persons are suspect.

Q11: Identify each of the "more than 25" Comstock QC inspectors referred to at page 4 of the Joint Stipulation dated July 12, 1985.

A11: The identities of the more than 25 Comstock QC inspectors who complained to the NRC since at least August 1984, are not specifically known to intervenors. We are informed of such a fact but not of the names of each of the inspectors. According to the NRC, 24 inspectors complained of harassment on March 29, 1985. See, April 5, 1985, NRC Memo at page 2.

Q12: Identify each of the Comstock QC inspectors

referred to at pages 13-21 of "Response to Applicant Commonwealth Edison Company's First Set of Quality Assurance Interrogatories and Requests to Produce Documents Directed to Intervenors Bridget Little Rorem, et al. and Motion for Protective Order: dated August 16, 1985.

A12: The following Comstock QC inspectors referred to in our August 16 Response, pp. 13-21, are identified:

- 4a. Inspector "I": [REDACTED]
[REDACTED]
- 6a. Inspector "II": [REDACTED]
- 7a. Inspector "III": [REDACTED]
- 9a. Inspector "IV": [REDACTED]
- 10a. Inspector "V": [REDACTED]
- 11a. Inspector "VI": [REDACTED]
- 12a. Inspector "VII": [REDACTED]
[REDACTED]
- 13a. Inspector "VIII": [REDACTED]
[REDACTED]
- 15a. Inspector "XI": "Inspector X" believed to be
[REDACTED]

Q13: Identify each and every person who you intend to call as a witness at the hearing in this matter on the contention, and with respect to each such person:

- a. Describe the witness' education and professional background;
- b. State the substance of the facts and opinions to

which the witness is expected to testify;

- c. Give a summary of the ground for each opinion; and
- d. Identify all documents which form the basis for each opinion.

A13: Intervenors have not at present identified any persons intended to be called as witnesses in the proceeding except as previously noted in our July 12, 1985, Motion To Admit Claims of Intimidation and Harassment of Comstock Quality Control (QC) Inspectors. However, pursuant to 10 CFR §2.740(e) Intervenors intend to seasonably supplement this response as required.

Q14: 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.

A14: These interrogatories are being answered by the undersigned counsel for Intervenors. No consultants or other advisors are relied upon for such answers.

DATED: January 23, 1986

Respectfully submitted,



Robert Guild
One of the Attorneys for
Intervenor Rorem, et al.

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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 Response to Applicant Commonwealth Edison Company's Second Set of Quality Assurance Interrogatories and Requests to Produce Documents Directed to Intervenors Bridget Little Porem, et al. and Motion For Protective Order 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 23th day of January, 1986.



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