



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

PDR-016
LPDR

OCT 16 1985

Docket No. 50-445/50-446

Ms. Billie Pirner Garde
Citizens Clinic Director
Government Accountability Project
1555 Connecticut Avenue, Suite 202
Washington, DC 20036

IN RESPONSE REFER
TO FOIA-85-59

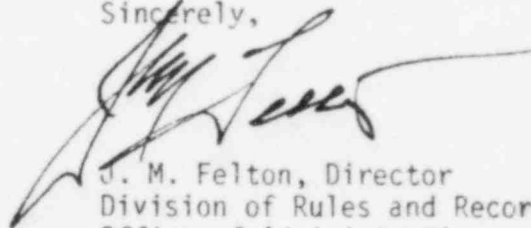
Dear Ms. Garde:

This is in further response to your letter dated January 21, 1985, in which you requested, pursuant to the Freedom of Information Act (FOIA), records related to the NRC Comanche Peak Task Force (now referred to as the Comanche Peak Project) established in March, 1984.

We are now placing the remaining three of the seven boxes of records in the coatings category into the Public Document Room (PDR) in file FOIA-85-59 under your name. In particular, with the exception of those records indicated by asterisks on the enclosed Appendix A, which are undergoing further staff review, we are placing documents numbered 14 through 89 in the PDR. This appendix is a continuation of the Appendix A made available to you in our previous letter of October 4. A separate set of the records identified on Appendix A is also being made available for public inspection and copying at the Local Public Document Room located at the University of Texas Library, 701 South Cooper Street, Arlington, Texas.

We will communicate with you further as staff review progresses on the remaining documents subject to your request.

Sincerely,



J. M. Felton, Director
Division of Rules and Records
Office of Administration

Enclosure: As stated

APPENDIX A
(Continued)

DOCUMENTS IN PDR FILE FOIA-85-59

<u>Box 5 - Coating Allegations, Licensing Background Information, Etc.</u>		<u>Pages</u>
<u>Coatings Allegations</u>		
14.	05/18/84 Memo D. Eisenhut from J. Collins "Proposed Board Notification-Comanche Peak Protective Coatings Allegations that have been Identified and Previously Forwarded to TUEC"	12
*15.	07/31/84 Master Allegation List	12
16.	08/03/84 Allegation/SSER Matrix	14
17.	10/01/84 Tracking Sheet	3
<u>Comanche Peak Coatings Licensing Background Information</u>		
18.	07/81 NUREG-0797 SER Related to the Operation of Comanche Peak Steam Electric Station, Units 1 and 2	11
19.	10/26/81 Ltr to TUGCO re Notice of Violation	4
20.	11/06/81 Ltr to TUGCO re IE Inspection Report	9
21.	11/19/81 Ltr. Madsen, Region IV, USNRC, from TUGCO re Response to NRC Notice of Violation Inspection Report No. 81-15, File No. 10130	4
22.	01/19/82 Ltr. to TUGCO from Seidle, NRC acknowledging letter of 11/19/81	1
23.	07/06/82 Ltr. to TUGCO re inspection conducted by Messrs. Boardman, Johnson, and Redano during 4/27-May 27, 1982	3
24.	03/14/83 Ltr to TUGCO re inspection conducted by Messrs. Gilbert and Johnson Jan. 27-28-Feb.1-2, 1983 attaching Notice of Violation	15
25.	04/11/83 Ltr. to TUGCO re Construction Appraisal Inspection 50-445/83-18, 50-446/83-12	20
26.	05/27/83 Ltr. to TUGCO attaching Inspection Report re Coatings	20
27.	02/28/84 Ltr. to TUGCO attaching Inspection Report related to matters before the ASLB	10

APPENDIX A
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	<u>Pages</u>
28. 06/29/84 Ltr. to Youngblood, NRC from Schmidt, TUGCO re Containment Sump Performance report	1
29. 07/84 Ltr. to TUGCO from R. DeYoung, IE re "Order Imposing Civil Monetary Penalty"	15
30. 08/17/84 Memo to ASLB from D. Eisenhut re "Board Notification Proposed FSAR Amendment on Protective Coatings (BN No. 84-139)"	2
31. 11/29/84 Ltr. to TUGCO re Comanche Peak Review - Request for Additional Information	12
<u>Unmarked folder</u>	
32. 06/22/84 Ltr. to Bangart, RIV from TUGCO re sixty allegations about protective coating practices at Comanche Peak	350
33. 06/13/84 Ltr. to Bangart, RIV from BNL attaching BNL's draft report on allegations	61
<u>Allegation Action Plan Matrix</u>	
34. 07/31/84 BNL CPSES TRT Audit Plan Area I thru VII	110
35. 07/27/84 Memo to Ippolito from A. Vietti re "Forthcoming Meeting with TUGCO - Protective Coating Practices at CP"	15
<u>Documentation of Compliance w/Regulations, RGs, SRP</u>	
36. 07/27/84 Memo to Ippolito from A. Vietti re "Forthcoming Meeting with TUGCO - Protective Coating Practices at CP"	13
37. 08/02/84 Ltr. to TUGCO from Ippolito re Meeting on Protective Coating Practices at Comanche Peak Scheduled for 8/8/84	1
38. 08/10/84 Ltr. to Ippolito from TUGCO attaching written responses to additional questions relative to protective coatings allegation	425

APPENDIX A
(Continued)

<u>Unmarked folder</u>		<u>Pages</u>
39.	08/14/84 Ltr. to Ippolito from TUGCO re detailed response to additional question relative to protective coating allegation No. 21	40
40.	08/21/84 Ltr. to Ippolito from TUGCO re detailed response to additional questions relative to protective coating allegations No. 15, 31, 33	12
<u>SSER 1 Backfit Program/Background Info</u>		
41.	07/27/83 TUGCO Office Memo re "Protective Coating Adhesive Tests"	2
42.	08/16/83 TUGCO Office Memo re "Tooke Tests on Pipe, Cable Tray, and Conduit Supports"	10
43.	12/20/83 Memo to J. Clark, Div. of Budget, NRC from L. Abrahamson RM/B, NRC re "Trip Report on Comanche Peak Backfit Inspection"	2
44.	02/10/84 TUGCO Office Memo re "Backfit Inspection of Protective Coatings in RCB #1"	12
45.	03/14/84 BNL Test Info	15
46.	05/15/84 Ltr to Lettieri, BNL from Office of Resource Management, NRC enclosing "Statistical Analysis of Protective Coating (Primer Only) Backfit Inspection Program at Comanche Peak - Unit 1"	7
47.	05/22/84 Memo to ASLB for CP 1&2 from Eisenhower "Board Notification - Interim Report on Protective Coatings (BN No. 84-106)"	9
48.	05/22/84 Ltr. to TUEC from RIV re special inspection of coatings program	3
49.	07/16/84 Ltr to Bangart, RIV from TUGCO re "Brookhaven Interim Report on Protective Coatings File No. 906.1, 10010"	19
50.	07/20/84 Ltr. to Bangart, RIV from TUGCO re written response to Sec. IV of the BNL Interim Report	50

APPENDIX A
(Continued)

		<u>Pages</u>
51.	09/10/84 TUGCO Office Memo to File re "Unit 1 Concrete Coating Adhesion Values Elcometer Calibration Matter SDAR CP-84-05"	5
52.	Undated Organizational Charts: TUEC	9
53.	07/16/84 Note T. Ippolito to P. Mathews w/Input Docs from TUGCO	96
<u>Individual folders on Allegations</u>		
*54.	Allegation files 1 through 60 and 62 (except Allegations 17 and 44)	approx. 3000
<u>General File</u>		
55.	03/07/84 Ltr. to TUGCO from Gibbs & Hill re "Reactor Core Cavity Coating Allegation"	6
56.	03/22/84 TUGCO Office Memo re Allegation 40 "Input on Air Quality for Protective Coating Process"	3
57.	04/12/84 Ltr. to Ebasco from Carboline re coin test procedure for checking the cure of Carbo Zinc 11	6
58.	05/14/84 Ltr. to BNL from NRC re "Statistical Analysis of Protective Coating Backfit Inspection Program at CP-Unit 1"	4
59.	09/11/84 Record of Interview "Adhesion Testing & Training"	3
60.	11/09/84 Phonecon Record re cigarette filter/cheatver valve (allegation 17)	2
<u>Box 6 - SSER Coatings Work Package Volumes</u>		
61.	SSER Coatings 4 Work Package Vol. VIII of XIII Inspection of Concrete Substrate Surface Preparation and Coating Application and Repair	67
62.	SSER Coatings 4 Work Package Vol. XII of XIII CCP-30A Coating Steel Substrates Inside Reactor Building and Radiation Areas	127
63.	SSER Coatings 4 Work Package Vol. XI of XIII Quality Procedures Manual	200

APPENDIX A
(Continued)

	<u>Pages</u>
64. <u>SSER Coatings 4 Work Package Vol. X of XIII</u> <u>QI-QP-11.4-1 Historical (Partial)</u>	60
65. <u>SSER Coatings 4 Work Package Vol. IX of XIII</u> <u>QI-QP-11.4-5 Historical (Excerpts)</u>	120
66. <u>SSER Coatings 4 Work Package Vol. XIII of XIII</u> <u>2323-AS-31</u>	400
67. <u>SSER 4 Coatings Work Package Vol. VII of XIII</u> <u>(Backfit Inspections)</u>	50
68. <u>SSER Coatings 4 Work Package Vol. VI of XIII</u> <u>QI-QP-11.4-27 Historical (Concrete Coatings Inspection)</u>	120
69. <u>SSER Coatings 4 Work Package Vol. V of XIII</u> <u>QI-QP-11.4-26 Historical (Steel Coatings Inspection)</u>	150
70. <u>SSER Coatings 4 Work Package Vol. IV of XIII</u> <u>CCP-30 - Construction Procedure 35-119 Rev. 0 "Coatings</u> <u>Containment Liners"</u>	250
71. <u>SSER Coatings 4 Work Package Vol. III of XIII</u> <u>CCP-40 Protective Coating of Concrete Surfaces (Construction</u> <u>Procedures)</u>	205
72. <u>SSER Coatings 4 Work Package Vol. II of XIII</u> <u>Protective Coating Inspection Manual</u>	214
73. <u>SSER Coatings 4 Work Package Vol. I of XIII</u> <u>CPSES Site Quality Assurance/Quality Control Organization</u>	120

APPENDIX A
(Continued)

	<u>Pages</u>
<u>Coatings: Area 7 Training Work Package</u>	
*74. Notes on Inspectors	46
*75. Notes on Painters	151
*76. General Notes	110
*77. General Notes	86
<u>Box 7 - Coatings Procedures, Miscellaneous</u>	
<u>Folder</u>	
78. CP-QP-3.0 Historical Info Received 9/11/84	85
79. CP-QP-2.1 Historical Info Received 9/11/84	120
80. Re Allegation 25	25
81. Painter Listing	30
*82. Personnel Qualifications	35
83. QC & CCP Procedure Listing	21
84. QC Inspector Listing	12
<u>Binder</u>	
85. SSER Coatings 3 Work Package	250
*86. SSER Coatings 2 Work Package	420
87. SSER Coatings 2 - DBA Qualification Testing - DBA Test Reports Vol. II of II (Continuation of "DBA Reports - Site Civil Engr. File")	500
88. SSER Coatings 2 - DBA Qualification Testing - DBA Test Reports Vol. I of II	400

APPENDIX A
(Continued)

	<u>Pages</u>
89. <u>Working File, Coatings #1 and #6</u>	Approximately 250
Letters in re Allegation #21	
Liner Adhesion Tests	
Concrete DFT's & Adhesion Tests	
Miscellaneous Steel Tooke Tests	
Audit of Miscellaneous Steel	
Coatings Exempt Log	
Audit of SG #1 & #4 Concrete	
Early Data on DFT's & Adhesion Tests on Liner and Concrete	

GOVERNMENT ACCOUNTABILITY PROJECT

1555 Connecticut Avenue, N.W., Suite 202
Washington, D.C. 20036

(202) 232-8550

G:85:104

January 21, 1985

FREEDOM OF INFORMATION ACT REQUEST

FREEDOM OF INFORMATION
ACT REQUEST

FOIA-85-59
Rec'd 1-25-85

Director
Office of Administration
Nuclear Regulatory Commission
Washington, D.C. 20555

To Whom It May Concern:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, the Government Accountability Project ("GAP") requests copies of any and all agency records and information, including but not limited to notes, letters, memoranda, drafts, minutes, diaries, logs, calendars, tapes, transcripts, summaries, interview reports, procedures, instructions, engineering analyses, drawings, files, graphs, charts, maps, photographs, agreements, handwritten notes, studies, data sheets, notebooks, books, telephone messages, computations, voice recordings, computer runoffs, any other data compilations, interim and/or final reports, status reports, and any and all other records relevant to and/or generated in connection with the overview, regulation and investigation of the Comanche Peak Nuclear Plant by any person, branch, or department of the NRC since January 18, 1985.

This request includes all agency records as defined in 10 C.F.R. § 9.3a(b) and the NRC Manual, Appendix 0211, Parts 1.A.2 and A.3 (approved October 8, 1980) whether they currently exist in the NRC official, "working," investigative or other files, or at any other location, including private residences.

If any records as defined in 10 C.F.R. § 9.3a(b) and the NRC Manual, *supra*, and covered by this request have been destroyed and/or removed after this request, please provide all surrounding records, including but not limited to a list of all records which have been or are destroyed and/or removed, a description of the action(s) taken relevant to, generated in connection with, and/or issued in order to implement the action(s).

GAP requests that fees be waived, because "finding the information can be considered as primarily benefitting the general public," 5 U.S.C. § 552(a)(4)(a). GAP is a non-profit, non-partisan public interest organization concerned with honest and open government. Through public outreach, the Project promotes whistleblowers as agents of government accountability. Through its Citizens Clinic, GAP offers assistance to local public interest and citizens groups seeking to ensure the health and safety of their communities. The Citizens Clinic is currently assisting several citizens groups, local governments and intervenors in the central Texas area concerning the construction of the Comanche Peak nuclear power plant.

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Director
Office of Administration

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We are requesting the above information as part of an ongoing monitoring project on the adequacy of the NRC's efforts to protect public safety and health at nuclear power plants.

For any documents or portions that you deny due to a specific FOIA exemption, please provide an index itemizing and describing the documents or portions of documents withheld. The index should provide a detailed justification of your grounds for claiming each exemption, explaining why each exemption is relevant to the document or portion of the document withheld. This index is required under Vaughn v. Rosen (I), 484 F.2d 820 (D.C. Cir. 1973), cert. denied, 415 U.S. 977 (1974).

We look forward to your response to this request within ten days.

Sincerely,

Billie Pirner Garde

Billie Pirner Garde
Citizens Clinic Director