



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF §
§
HOUSTON LIGHTING & POWER § DOCKET NOS. STN-498 OL
COMPANY, ET AL. § STN-499 OL
§
(South Texas Project §
Units 1 and 2) §

SECOND SET OF INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS FROM
HOUSTON LIGHTING & POWER COMPANY, ET AL.,
APPLICANTS, TO CITIZENS CONCERNED
ABOUT NUCLEAR POWER, INC.

Preface

Pursuant to Sections 2.740b and 2.741 of the Commission's Rules of Practice, Houston Lighting & Power Company, Project Manager of the South Texas Project, acting on behalf of itself and the other applicants, the City of San Antonio, Texas, acting by and through the City Public Service Board of the City of San Antonio, Central Power and Light Company and the City of Austin, Texas (hereinafter "Applicants"), propounds the following Interrogatories and requests for Production of Documents to Citizens Concerned About Nuclear Power, Inc. (hereinafter "CCANP" or "Intervenor").

Applicants incorporate herewith the instructions and definitions set forth in the First Set of Interrogatories and Requests For Production of Documents to CCANP. All

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parenthetical notations contain the page and, where applicable, answer number or exhibit letter referencing the pertinent portion of the Answers Of Citizens Concerned About Nuclear Power, Inc. to First Set of Interrogatories and Requests For Documents.

I. Interrogatories

Interrogatory No. 1: Identify and produce each document contained in the "bundle of documents" which purportedly caused CCANP's answers to the first set of interrogatories to be late-filed. (p. 1)

Interrogatory No. 2: (a) Identify and produce every document received or provided by CCANP during its "Cooperat[ion] in an investigation conducted by the Federal Bureau of Investigation." (p. 2)

(b) Identify each person contacted by CCANP during its participation in the above referenced investigation. (p. 2)

Interrogatory No. 3: (a) Identify and produce every document received or generated by CCANP during "its own investigation to determine why the United States Attorney decided not to present his findings to a federal grand jury..." (p. 3)

(b) Identify each person contacted by CCANP during the above referenced investigation. (p. 3)

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Interrogatory No. 4: (a) State the facts, the source of these facts, and produce all documents which lead CCANP to believe that "the FBI, among other things, found extensive evidence of false documentation of cadweld inspections."

(p. 3)

(b) Have representatives of CCANP spoken with any personnel of the FBI concerning findings by the FBI regarding the falsification of "documentation of cadweld inspections"?

(p. 3)

(c) Identify each such person and describe the substance of each conversation.

Interrogatory No. 5: (a) State the facts, the source of these facts, and produce all documents which CCANP relies upon in asserting that "extensive, pervasive, and willful violations of 10 CFR, Part 50 ... [have been confirmed by] past NRC investigations of this plant..." (p. 4)

(b) Identify each specific instance of which CCANP is aware in which NRC investigations have "confirmed" "extensive, pervasive and willful violations of 10 CFR, Part 50 . . ."

(p. 4)

(c) Has CCANP spoken with any official of the NRC or any other person concerning any activity of HL&P and/or its contractors for the STP project which CCANP regards as part of "extensive, pervasive and willful violations of 10

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CFR, Part 50." (p. 4) Identify each such person and describe the substance of each conversation.

Interrogatory No. 6: (a) Describe the facts or occurrences which CCANP alleges contribute to "a climate of fear at the construction site." (p. 4)

(b) Identify the source of the information in (a) above.

(c) Identify each person contacted by CCANP who refused to provide information for fear of losing his or her job.

(p. 4)

Interrogatory No. 7: Identify each communication between Applicants and the NRC which CCANP relies upon to support its assertion that the Mechanical Electrical Auxiliary Building is being constructed one foot short. (p. 6, no. 1)

Interrogatory No. 8: (a) Identify the "other parts of the plant," besides the containment shell walls, which CCANP asserts contains concrete voids. (p. 6, no. 3)

(b) Identify the individual or individuals who have "told" CCANP "that voids have been found in other parts of the plant."

(c) Identify the documents of which you are aware which support this allegation.

Interrogatory No. 9: (a) CCANP alleges there is no "uniform, continuous process for testing for voids." (p. 6, no. 3)

State the specific parts of the void testing program which

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are deficient when evaluated against CCANP's criteria for "uniform, continuous process for testing for voids."

(b) Do you allege that the void testing program violates 10 CFR 50, Part B? If so, identify the provisions thereof which are violated and the basis for such allegation.

Interrogatory No. 10: (a) Describe the fact or occurrence and produce every document CCANP relies upon to support the assertion that there has been "improper pouring of concrete" in the wall enclosing the containment building. (p. 6, no. 4)

(b) Identify each person with whom CCANP has spoken in regard to this matter.

Interrogatory No. 11: Identify the exact "design specifications" which were violated by the "presence of voids." (p. 7, no. 5)

Interrogatory No. 12: (a) Explain precisely why it is necessary to "relocate" cadwelds. (p. 7, no. 8)

(b) Explain precisely what verifications of quality are performed after a cadweld is "relocated." (p. 7, no. 8)

(c) Identify the "verifications" explained above by citation to the appropriate South Texas Project Quality Assurance procedure and/or NRC regulation.

Interrogatory No. 13: (a) Identify those persons with whom CCANP has discussed the assertion that taper ties were used to construct the containment exterior shell. (p. 8, no. 10)

(b) Describe the substance of each conversation.

(c) Produce all documents upon which CCANP relies to support the assertion that taper ties were used to construct the containment exterior shell.

Interrogatory No. 14: (a) State the facts, the source of these facts, and produce all documents which CCANP relies upon to support the assertion that the use of taper ties is "a violation of standard construction practices." (p. 8, no. 10)

(b) Identify those persons with whom CCANP has discussed this assertion.

(c) Describe the substance of each conversation.

Interrogatory No. 15: Identify the design engineer who "ordered all the holes to be filled." (p. 8, no. 10)

Interrogatory No. 16: (a) Identify those persons with whom CCANP discussed the assertion that taper tie holes "have not been filled" or "were partially filled." (p. 8, no. 10)

(b) Describe the substance of each conversation.

(c) Produce all documents upon which CCANP relies to support this assertion.

Interrogatory No. 17: (a) Identify those persons with whom CCANP has discussed the assertion that the hole "grout is supposed to withstand significant pounds per square inch of pressure." (p. 8, no. 10)

- (b) Describe the substance of each conversation.
- (c) Produce all documents upon which CCANP relies to support this assertion.

Interrogatory No. 18: Identify the exact location of the taper tie hole tested by Mr. Swayze by using "blunt steel rods." (p. 8, no. 10)

Interrogatory No. 19: (a) Identify the exact location of the waterproof membranes which "were put on at night and never inspected." (p. 8, no. 10)

(b) Identify the date the waterproof membranes identified in (a), above, were installed.

(c) Identify the date Mr. Swayze "attempted to have the backfill removed so that inspection could take place."

(p. 8, no. 10)

(d) Identify each inspection that was omitted for the locations of the waterproof membrane identified in (a), above.

Interrogatory No. 20: Describe the damage which CCANP asserts has occurred to the membrane seals in the containment structure referenced in Contention 1, paragraph 4. (p. 8, no. 10)

Interrogatory No. 21: Explain precisely how the damage to the membrane seals violates the provisions of 10 CFR Part 50, Appendix B, Sections X, XV and XVI.

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Interrogatory No. 22: Explain precisely how the alleged absence of waterproof membrane inspections at night affects "safety-related functions." (p. 9, no. 11)

Interrogatory No. 23: (a) Identify those persons with whom CCANP has discussed the assertion that "[taper tie] holes are still not filled." (p. 9, no. 11)

(b) Describe the substance of each conversation.

(c) Produce all documents on which CCANP relies to support this assertion.

Interrogatory No. 24: Identify exactly where besides "around the equipment doors" there are steel reinforcement bars "missing from the containment structure." (p. 10, no. 14)

Interrogatory No. 25: (a) Identify specifically each instance, and the inspectors involved, where missing steel reinforcing bars were not reported. (p. 10, no. 14)

(b) Identify the individuals who intimidated inspectors into "not reporting the omission." (p. 10, no. 14)

Interrogatory No. 26: Produce those "documents which came to CCANP from persons unknown who apparently previously worked or currently work at the construction site of the South Texas Nuclear Project." (p. 11, no. 16)

Interrogatory No. 27: (a) Identify specifically which "applicable code" CCANP asserts was ignored in the cadwelding described in Exhibits G thru G-4. (p. 12, no. 16(1))

(b) Explain precisely why CCANP believes that the code identified in (a) above is "applicable" for the cadwelds identified in Exhibits G thru G-4.

Interrogatory No. 28: (a) Identify specifically each instance where "corrective measures were not taken" after "staggered witness marks problems" were encountered. (p. 12, no. 16(1))

(b) Identify those persons with whom CCANP has discussed the assertion that "corrective measures were not taken" for each instance identified in (a) above.

(c) Describe the substance of each conversation.

(d) Produce all documents upon which CCANP relies to support the assertion that "corrective measures were not taken" for each instance identified in (a) above.

Interrogatory No. 29: (a) Identify the cadwelds by number, if known to CCANP, or by exact location in the base mat of Unit 1 containment building, if known to CCANP, which CCANP alleges were "randomly assigned" control numbers. If CCANP does not know the number or location of these cadwelds, identify same by time at which CCANP alleges cadweld "numbers were randomly assigned." (p. 14, no. 16(4))

(b) Identify every QC inspector or other person allegedly involved in recording "knowingly inaccurate" cadweld numbers. (p. 14, no. 16(4))

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Interrogatory No. 30: (a) Identify specifically each instance where a "cadweld was approved despite its being in violation of quality assurance standards." (p. 13, no. 16(3)).

(b) Identify those persons with whom CCANP has discussed the assertion described in (a), above.

(c) Describe the substance of each conversation.

(d) Produce all documents on which CCANP relies to support the assertion described in (a), above.

Interrogatory No. 31: (a) Identify specifically each instance where a "person preparing the Examination Check for the office record changed almost the entire report of the field inspector." (p. 14, no. 16(5))

(b) Identify each person with whom CCANP has discussed the assertion described in (a), above.

(c) Describe the substance of each conversation.

(d) Produce all documents on which CCANP relies to support the assertion described in (a), above.

Interrogatory No. 32: (a) Identify specifically each instance where witness "marks were placed on the bars after the weld was shot." (p. 15, no. 16(7))

(b) Identify each person with whom CCANP has discussed the assertion described in (a), above.

(c) Describe the substance of each conversation.

(d) Produce all documents on which CCANP relies to support the assertion described in (a), above.

Interrogatory No. 33: (a) Identify each person with whom CCANP has discussed the assertion that no cadwelds were inspected "from August 1 through September 10." (p. 15, no. 16(8))

(b) Describe the substance of each conversation.

(c) Produce all documents on which CCANP relies to support the assertion described in (a), above.

Interrogatory No. 34: (a) Identify specifically each instance where (i) "the required inspection process" was abused, (ii) workmanship was "shoddy", (iii) inspections were not done, (iv) records were "created on a false basis." (p. 16, no. 16(9))

(b) Identify each person with whom CCANP has discussed the particulars identified in (a), above.

(c) Describe the substance of each conversation.

(d) Produce all documents on which CCANP relies in support of each assertion specified in (a), above.

Interrogatory No. 35: (a) Identify by number the cadwelds "which are not capable of being verified." (p. 16, no. 17)

(b) Describe precisely the "verification" process which CCANP asserts is required and has been omitted in regard to the cadwelds identified in (a), above.

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(c) Identify those persons with whom CCANP has discussed the assertion that the cadwelds identified in (a), above, were not properly "verified."

(d) Describe the substance of each conversation.

(e) Produce all documents on which CCANP relies to support the assertion that the cadwelds identified in (a), above, were not properly "verified."

Interrogatory No. 36: Identify by date, participants and subject matter each conversation "between quality control inspectors and the design engineers [which] revealed that the design engineers were being lied to by the construction personnel." (p. 16, no. 19)

Interrogatory No. 37: Identify exactly that portion of the NRC Regulations or South Texas Project Quality Assurance Procedures which CCANP asserts requires that "quality control inspectors verify that the engineering action taken in response to the field request for engineering action was based on the actual problem as it existed in the field." (p. 16, no. 19)

Interrogatory No. 38: (a) Identify specifically each design change approved by site representatives of the design engineering department "without submitting the changes to Houston." (p. 16, No. 19)

(b) Identify each person with whom CCANP has discussed the assertion set forth in (a), above.

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- (c) Describe the substance of each conversation.
- (d) Identify exactly that portion of the NRC Regulations and/or South Texas Project design control procedures which CCANP asserts was violated in the instances identified in (a), above.
- (e) Produce all documents upon which CCANP relies to support the assertion set forth in (a), above.

Interrogatory No. 39: Identify exactly what portion of the NRC Regulations and/or South Texas Project Quality Assurance Procedures which CCANP asserts requires that quality control inspectors are responsible for verifying that design changes conform to the purposes of the original design. (p. 17, no. 22)

Interrogatory No. 40: Identify exactly that portion of the NRC Regulations and/or South Texas Project Quality Assurance Procedures which CCANP asserts requires that the "original designer" approve design changes. (p. 17, no. 27)

Interrogatory No. 41: (a) Identify specifically each design change verbally approved by Mr. Doug Robertson. (p. 18, no. 29)

- (b) Identify each person with whom CCANP has discussed the assertion described in (a), above.
- (c) Describe the substance of each conversation.

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(d) Produce all documents upon which CCANP relies to support the assertion described in (a), above.

Interrogatory No. 42: Identify by number, or otherwise, the pour card or cards CCANP alleges were falsified by:

- (a) Mr. Rocky Crisp
- (b) Mr. Jack Duke
- (c) Mr. Roger Forte
- (d) Mr. Allen Hammons
- (e) Mr. Sam Horton
- (f) Mr. B. N. Kesarinath
- (g) Mr. Carl King
- (h) Mr. Bill Lazear
- (i) Mr. Paul Pelingaris
- (j) Mr. Suresh H. Shah
- (k) Mr. Daniel E. Swayze

(p. 18, no. 32)

Interrogatory No. 43: (a) Identify all of the individuals known to CCANP to have been involved in the assault on Mr. James Marshall. (p 18, no. 35)

(b) Identify all of the individuals known to CCANP to have been involved in the assault on Mr. Jerry Lacey.

(c) Identify each person with whom CCANP has discussed the allegations set forth in (a) or (b), above.

(d) Describe the substance of each conversation.

(e) Produce all documents upon which CCANP relies to support the allegations set forth in (a) and (b), above.

Interrogatory No. 44: (a) Identify each person with whom CCANP has discussed the assertion that "Mr. Larry Perry was fired after calling in the NRC on, among other things, the falsification of witness marks on cadwelds." (p. 19, no. 35)

- (b) Describe the substance of each conversation.
- (c) Produce all documents upon which CCANP relies to support the assertion set forth in (a), above.

Interrogatory No. 45: (a) Identify specifically each and every instance of "intimidation" or "abuse" which CCANP asserts was "endemic." (p. 19, no. 35)

- (b) Identify each person with whom CCANP has discussed the allegations set forth in (a), above.
- (c) Describe the substance of each conversation.
- (d) Produce all documents on which CCANP relies to support the allegations set forth in (a), above.

Interrogatory No. 46: (a) Explain precisely how Exhibit P shows "pervasive construction errors." (p. 19, no. 37)

- (b) Explain precisely how Exhibit P shows "the tension between construction workers and inspectors." (p. 19, no. 37)
- (c) Identify each instance in which CCANP asserts that "pervasive construction errors" caused "tension between construction workers and inspectors."
- (d) Identify each individual with whom CCANP has spoken concerning the "tension between construction workers and inspectors."
- (e) Produce each document upon which CCANP relies for the conclusion set forth in (c), above.

Interrogatory No. 47: Identify each and every construction record, other than the "pour cards" referenced in Contention 1, Paragraph d., which you assert has been falsified. (p. 19, 1 through 4)

Interrogatory No. 48: Identify each person you intend to call as a witness at the Hearing to testify to matters relating to Contention 2 or any part of Contention 2. (p. 19, 2 through 4)

Interrogatory No. 49: (a) List all events which can cause reactor coolant pressure to increase above "specified limits."

(b) What are the "specified limits" for coolant pressure?

(c) Describe every sequence of events which will result in the failure of automatic pressure relief mechanisms, thereby allowing a pressure rise "to go unchecked."

(d) What pressure will cause the "fracture or rupture of the vessel?" (p. 20, no. 4)

II. Production of Other Documents

1. Produce for inspection the originals from which CCANP made copies for Exhibits G-2, G-3, G-4, H-1, H-2, I-1, I-2, J, K-1, K-2, K-3, K-4, L, N, O, and P attached to the "Answers of Citizens Concerned About Nuclear Power, Inc. to First Set

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of Interrogatories from Houston Lighting & Power Company, et al., Applicants, and to NRC Staff Interrogatories and Request for Documents."

Respectfully submitted,



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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

IN THE MATTER OF

HOUSTON LIGHTING & POWER
COMPANY, ET AL.

(South Texas Project,
Units 1 and 2)

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Docket Nos. STN 50-498-OL
STN 50-499-OL

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Second Set of Interrogatories and Request for Production of Documents from Houston Lighting & Power Company, et al., Applicants, to Citizens Concerned About Nuclear Power in the above-captioned proceeding were served on the following by deposit in the United States mail, postage prepaid, or by hand delivery this 25th day of January, 1980:

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Date: January 25, 1980

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