

1 UNITED STATE OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

4 In the Matter of)
5 PORTLAND GENERAL ELECTRIC COMPANY,) Docket No. 50-344
ET AL.) (Control Building)
6 (Trojan Nuclear Plant))

7 STATE OF OREGON INTERROGATORIES TO THE STAFF OF
8 THE NUCLEAR REGULATORY COMMISSION
ON THE CONTROL BUILDING MODIFICATIONS

9 The State of Oregon hereby requests, pursuant to
10 10 CFR § 2.720(h)(2)(ii), that the Staff of the Nuclear
11 Regulatory Commission answer separately and fully, in
12 writing under oath or affirmation, the following inter-
13 rogatories within 14 days after service hereof.

14 For each response to the interrogatories listed
15 below, identify the person or persons who prepared, or
16 substantially contributed to the preparation of the
17 response.

18 The State of Oregon further requests that the staff
19 of the Nuclear Regulatory Commission, pursuant to
20 10 CFR § 2.790, provide copies of, or make available
21 for inspection and copying, any documents designated by
22 the staff in response to any of the accompanying
23 interrogatories within 30 days after service thereof.

24 INTERROGATORY 1

25 The following relate to Section 4.3 of the Safety
26 Evaluation Report, p. 24:

1 (a) Why might Cadwelding, electric arc welding or
2 cutting by electric arc or oxyacetylene torch be required
3 in the cable spreading room and control room?

4 (b) In order to ensure that smoke and arc do not
5 interfere with control room operations, should the activ-
6 ities identified in (a) above be prohibited or be subjected
7 to procedural controls? If not, please explain.

8 (c) Given the potential serious adverse consequences
9 of a fire in the control room or cable spreading room, why
10 does the staff not recommend that the activities identified
11 in (a) above be prohibited in those locations?

12 INTERROGATORY 2

13 The following relate to the discussion in Paragraph 4.6
14 of the Safety Evaluation Report, commencing at p. 31:

15 (a) If the cables located below plate segment #7 were
16 severed by a drop of that plate, would safe shutdown of the
17 plant be complicated?

18 (b) If yes, does the reasoning that leads the staff to
19 conclude that, for reasons of conservatism, the plant should
20 be in a cold shut down mode while plate segment #8 is being
21 installed also apply to the installation of plate segment
22 #7? If not, why not?

23 INTERROGATORY 3

24 The following relate to questions raised by the staff
25 in Paragraph 5.1 of the Safety Evaluation Report regarding

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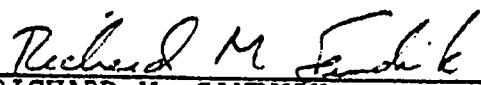
1 assumed stiffnesses in the finite element analysis of the
2 modified control building complex:

3 (a) Because the stress/strain relationship (i.e.,
4 stiffness) of concrete in general is not linear, what is
5 the approximate difference (expressed in percentages, if
6 possible) between the average stiffness used in the finite
7 element analysis of the proposed modified complex and the
8 average stiffness used in a finite element analysis of the
9 complex had it been built according to the original speci-
10 fications?

11 (b) Are the questions which the NRC staff has regarding
12 assumed stiffnesses based solely on the design error, or are
13 they in part inherent to any finite element analysis of con-
14 crete structures?

15 (c) Would the same NRC staff questions regarding
16 assumed stiffnesses with respect to normal stresses acting
17 upon the walls of the proposed modified complex be applicable
18 to normal stresses acting upon the structure had it been
19 built according to the original specifications?

20 Respectfully submitted,

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22 
23 RICHARD M. SANDVIK
24 Assistant Attorney General
25 of Attorneys for the
26 State of Oregon

CERTIFICATE OF SERVICE

I, Richard M. Sandvik, hereby certify that on this 23th day of February, 1980, I served the within State of Oregon Interrogatories upon the following parties of record by then depositing in the United States Post Office at Portland, Oregon, full, true, and correct copies thereof, addressed to the said parties of record at the following addresses listed below, and prepaying the postage thereon:

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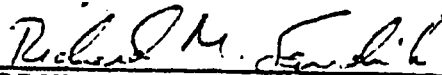
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