

4/18/80

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ADMINISTRATIVE LAW JUDGE

In the Matter of

CONSUMERS POWER COMPANY
(Palisades Nuclear Power
Facility)

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Docket No. 50-255
(Civil Penalty)

NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION
OF DOCUMENTS FROM, CONSUMERS POWER COMPANY

The Nuclear Regulatory Commission (NRC) Staff hereby requests that Consumers Power Company, pursuant to 10 CFR 2.740b, answer separately and fully in writing under oath or affirmation the following interrogatories within 30 days after service hereof. For each response to the interrogatories listed below, identify the person or persons who prepared or contributed to the preparation of the response. For all documents that are identified in response to the interrogatories, please identify the document by author, title, the date on which it was written, the general subject matter of the document, and the place where a copy of the document may be obtained. When the interrogatory asks that Consumers Power Company identify persons, please state the person's full name, his or her business address and telephone number or other address and telephone number where he or she may be reached, his or her former or current position with or relationship to Consumers Power Company.

The NRC Staff further requests that Consumers Power Company, pursuant to 10 CFR 2.741, provide copies of, or make available for inspection and copying by the Staff, the documents identified by Consumers Power Company in response to the interrogatories below.

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INTERROGATORIES

1. Describe each investigation conducted or being conducted by Consumers Power Company since September 11, 1979, into the circumstances surrounding the discovery on that date of two locked-open manual containment isolation valves in Containment Building penetration 4a. at the Palisades Nuclear Power Facility. In addition,
 - (a) Identify the persons who have conducted or participated in each of these investigations on behalf of Consumers Power Company. Identify these persons' position or other relationship to Consumers Power Company.
 - (b) Identify all persons interviewed by Consumers Power Company or its agents during the course of each of these investigations. For each person so identified,
 - (i) Identify his or her position with, or other relationship to, Consumers Power Company;
 - (ii) Identify the date on which and the person (or persons) by whom such person was interviewed;
 - (iii) Describe the purpose of the interview and summarize the information elicited from the interviewee;
 - (iv) Identify any transcript, affidavit, memorandum, or other document prepared as a result of such interview;
 - (v) Identify any documents which refer to or discuss the interview.
 - (c) For each of these investigations provide the date the investigation was completed or is expected to be completed, the results of each investigation, and if the results differ from the conclusions and analysis presented in the Consumers Power Company's Licensee Event Report 79-037 (dated September 28, 1979 and revised October 31, 1979) the basis for the changed conclusion or analysis. If an investigation is not yet completed,

provide the results when completed.

(d) State whether any tests, experiments, or other analyses have been performed as a part of these investigations on any equipment used at the Palisades Nuclear Power Facility. For each test, experiment or analysis,

(i) Identify each piece of equipment so tested or analyzed in such experimentation and identify the purpose for which such equipment is used at the Palisades Nuclear Power Facility.

(ii) Identify the date on which the equipment was tested or analyzed and identify the persons who performed the tests, experiments, or other analyses to which the equipment was subjected.

(iii) State the purpose for conducting such testing, experimentation or analysis of the equipment, i.e., what were the results of the testing intended to show and what conclusions may be drawn from the test results?

(iv) Describe the methodology used in the test, experiment, or analysis. This description should include an identification of the assumptions, techniques, conditions, and other relevant parameters used in performing the test, experiment, or analysis.

(v) Describe the results of the test, experiment, or analysis and include in this description the conclusions which Consumers Power draws from these results. Identify the person or persons who analyzed the results and drew those conclusions for Consumers Power Company.

(vi) Identify all documents which relate or refer to the test, experiment, or analysis.

2. Describe all calculations or estimates which Consumers Power Company has made of radiation releases or doses which might be incurred as a consequence of the manual containment isolation valves being open during normal or accident conditions.

- (a) Describe the accident or other incident postulated to have led to such radiation releases or doses.
 - (b) Describe all other assumptions which influence the calculation or estimate.
 - (c) Identify the date on which the calculation or estimate was made and identify the person or persons who made the calculation or estimate.
 - (d) Identify the potential radiation releases or doses calculated or estimated.
 - (e) Identify each document which contains or which refers to the calculation or estimation.
3. In the discussion of certain dose calculations on page three of Mr. Youngdahl's letter of November 29, 1979, to Mr. Stello, it is stated that "[w]e expect [sic] to make further refinements in the calculation using test data."
- (a) Describe the refinements made to the calculations referred to in Mr. Youngdahl's letter;
 - (b) Describe the 2-hour thyroid dose at the site boundary determined from these revised calculations;
 - (c) Describe the whole body dose at the site determined from these revised calculations; and
 - (d) Identify all documents in which contain the refined calculations or which refer to the refined calculations.
4. Identify the person or persons who installed the replacement HEPA filter in the containment building exhaust valves bypass line (penetration 4a) on April 5, 1978.

- (a) State whether this person or these persons opened the two manual containment isolation valves during the replacement of the filter or the functional testing of operability of the replaced filter.
 - (b) State whether this person or these persons closed the two manual containment isolation valves upon conclusion of the replacement and the testing of the replacement filter. If Consumers Power Company states that the valves were closed at the conclusion of the replacement and testing of the filter, describe the basis for reaching such conclusion and,
 - (i) Identify the person who closed the valves;
 - (ii) Identify the date on which said person closed the valves and identify the time at which the valves were closed in relation to the replacement and testing of the new HEPA filter;
 - (iii) Identify the date on which and describe the circumstances under which Consumers Power Company first learned that to this person stated the valves had been closed;
 - (iv) Identify each document relied upon to show that this person or persons closed the valves.
5. Identify the person or persons who completed the Containment Integrity Checklist C.L.3.3. prior to the return to operation of the Palisades Nuclear Power Facility in April 1978. In addition,
- (a) State whether this person or these persons inspected the condition of the two manual containment isolation valves in penetration 4a. during completion of the checklist. If this person or these persons inspected

the valves in penetration 4a., identify the precise time and date at which the valves were inspected and identify the stage of completion of operations involving the replacement and testing of the HEPA filter; and

- (b) State whether this person or these persons manipulated in any manner the two manual containment isolation valves in penetration 4a. during completion of the checklist. State whether this person or these persons closed the two valves. If Consumers Power Company states that the valves were closed by this person or these persons, describe the basis for reaching such conclusion and
 - (i) Identify the person or persons who closed the valves;
 - (ii) Identify the time and date on which said person or persons closed the valves;
 - (iii) Identify the date on which and describe the circumstances under which Consumers Power Company first learned that this person or persons stated the valves were closed; and
 - (iv) Identify each document relied upon to show that this person or persons closed the valves.

6. Describe the locking mechanism on the two manual containment isolation valves. In addition,

- (a) Describe the equipment required to manipulate, i.e., to open or close the valves; and
- (b) Identify all persons who would have had access to such equipment.

7. State whether any person manipulated the manual containment isolation valves between April 5, 1978, and September 11, 1979.
 - (a) Identify each person who manipulated the valves;
 - (b) Identify the date on which each such person manipulated the valves;
 - (c) Describe the manner in which each such person manipulated the valves;
 - (d) Identify the date on which and describe the circumstances under which Consumers Power Company first learned that each such person manipulated the valves; and
 - (e) Identify each document relied upon to show that each such person manipulated the valves.

8. Identify the person who discovered the two manual containment isolation valves in penetration 4a. in a locked-open position on September 11, 1979.

9. In his letter of November 29, 1979, to Mr. Stello, Mr. Youngdahl of Consumers Power Company states in effect that there have been "many instances involving similar events, where licensees have not been cited at all for noncompliance or where, if cited, they have been penalized at a much lower level."
 - (a) Identify each of the "many instances" to which Mr. Youngdahl referred in his letter;
 - (b) State the reasons why each of these "many instances" are "similar events" to the incident at the Palisades Nuclear Power Facility.

Respectfully submitted,


James Lieberman


Stephen G. Burns

Counsel for NRC Staff
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dated at Bethesda, Maryland
this 18th day of April, 1980.

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of NRC STAFF INTERROGATORIES TO, AND REQUEST FOR THE PRODUCTION OF DOCUMENTS FROM, CONSUMERS POWER COMPANY in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk, through deposit in the Nuclear Regulatory Commission's internal mail system, this 18th day of April, 1980.

Hon. Ivan W. Smith*
Administrative Law Judge
Atomic Safety & Licensing Board
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Docketing & Service Section *
Office of the Secretary
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

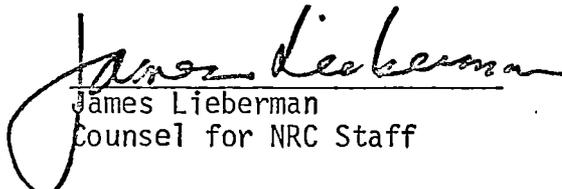
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