

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)
The Cincinnati Gas & Electric)
Company, et al.) Docket No. 50-358
(Wm. H. Zimmer Nuclear Power Station)



MIAMI VALLEY POWER PROJECT'S ANSWERS
TO NRC STAFF'S INTERROGATORIES

1. Identify and describe the inadequacy of the welds upon the electric cable trays.

The welds lack fusion therefore they do not have the necessary strength.

2. Identify and describe in what way the welds fail to meet NRC specification.

MVPP only knows of specifications accepted in the welding trade and that they were not complied with as required by the contract.

3. Identify and describe in what way the welds fail to meet ASME specification.

The welders who welded the vertical fittings were unable to make a weld with fusion therefore the welds they made lack fusion.

4. Identify and set forth the NRC and ASME specification which apply to welds upon electric cable trays.

ASME section 9; NRC specifications unknown.

5. Is the integrity of the cable trays a necessary safety function of plant operation.

Yes. *[Handwritten signature]*

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6. Set forth the basis for your answer to interrogatory no. 5.

Cable trays are stacked three on top of each other. One level contains the primary system, the other two levels contain the backup systems. If one level breaks it will, due to added weight, very likely break the trays on the other levels which could cause loss of electrical power for both primary and back-up safety systems.

7. Does Cincinnati Gas and Electric Company (CG&E) apply standards to welding the cable trays different than those required by NRC?

Unknown.

8. Identify and describe the qualifications required of welders in order to weld upon the cable trays.

Pass test set out in ASME section 9 and then perform production welds with the same quality as the test welds.

9. Identify and describe the lack of such qualifications by welders--setting forth the time period that such alleged unqualified welders welded and identify the trays upon which they are alleged to have welded.

The welders could never pass the test in ASME section 9. They never had formal welding training. The entire time during which they welded the vertical fittings on the cable trays. All vertical fittings on all cable trays.

10. What is a "certified welder pursuant to NRC regulations" (see Saul Rigberg filing dated April 2, 1979, page 8, line 5)?

This refers to a welder who is certified pursuant to ASME section 9.

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11. Identify and describe what is a proper test of a weld upon a cable tray.

Test the welder to see that he is qualified to make a weld with fusion, then inspect to see that production welds are performed in the same manner as test welds.

12. Identify and describe what tests were made by CG&E of the welds upon the cable trays.

Tore welds apart. No vertical fittings were tested.

13. Identify by name and address all expert witnesses which MVPP intends to use at the hearings to substantiate contention 14.

Unknown at the present time.

14. Summarize the testimony of all expert witnesses which MVPP intends to use at the hearing to substantiate its contention 14.

Object

15. Set forth the qualifications of all expert witnesses which the MVPP intends to use to substantiate its contention 14.

See answer to interrogatory 13.

16. Identify all graphic materials used by, or in the possession of, MVPP or any of its members or consultants which tend to support contention 14.

None.

17. Will MVPP make the graphic materials identified in response to interrogatory no. 15 voluntarily available to NRC Staff for examination and copying during normal business hours in the greater Cincinnati metropolitan area?

Yes, if any come into MVPP's possession.

18. Identify and describe what aspect of the manufacturing process was inadequate.

Unknown

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19. What part of a control rod was inadequately manufactured?

The blades

20. What is the inadequacy of the control rod resulting from the alleged inadequate manufacture?

The blades are apparently too large.

21. What specific part of the control rod is affected by improper manufacture and how does this effect the performance of the control rod?

Oversized rods may not move as freely as necessary.

22. What is the size specification for the control rod which is not met because of improper manufacture?

.280 inches

23. How is the control rod measured to determine whether it conforms to the size specification?

A 'go or no go' gauge is used.

24. Identify by name and address all expert witnesses which MVPP intends to use at the hearing to substantiate Contention 15.

Unknown at present time.

25. Summarize the testimony of all expert witnesses which MVPP intends to use at the hearing to substantiate its Contention 15.

Objection.

26. Set forth the qualifications of all expert witnesses which the MVPP intends to use to substantiate its Contention 15.

See answer to interrogatory 24.

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27. Identify all graphic materials used by, or in the possession of, MVPP or any of its members or consultants which tend to support Contention 15.

None

28. Will MVPP make the graphic materials identified in response to interrogatory 27 voluntarily available to NRC Staff for examination and copying during normal business hours in the greater Cincinnati metropolitan area?

Yes, if any come into MVPP's possession.

29. Identify and describe with particularity the seals alleged not to meet minimum specifications, including a description of where they are located upon the control rod.

Seals are located at one end of the control rod.

30. How many control rods have defective seals?

Unknown.

31. Identify and describe the "minimum specifications for smoothness" for all seals identified in response to interrogatory 29.

A rough surface gauge was used to compare the surface smoothness/roughness to specifications.

32. What is the material of which the seals are composed?

Unknown.

33. Describe the manufacturing process by which the seals are made smooth.

Unknown.

34. Describe the testing procedure used to determine whether the smoothness of the seals meets the minimum specifications identified in response to interrogatory 31 above.

See answer to question 31.

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35. What is the water leakage rate per each alleged defective seal?

Unknown

36. Does CG&E have any provisions for collection of water due to the alleged defective seals?

Unknown

37. Describe the operational mode when the seals would be operable and what activities lead to their being needed.

Unknown

38. Are defective seals now installed at the Zimmer facility?

Apparently

39. Has CG&E been informed that it has installed defective control rod seals at the Zimmer site?

Apparently

40. What actions has CG&E taken to remedy the installation of defective seals, if the response to interrogatory 38 is yes?

Unknown

41. Identify by name and address all expert witnesses who MVPP intend to use at the hearing to substantiate its Contention 16.

Unknown at present time.

42. Summarize the testing of all expert witnesses which MVPP intends to use at the hearing to substantiate its Contention 16.

Objection

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43. Set forth the qualifications of all expert witnesses which MVPP intends to use to substantiate its Contention 16.

See answer to interrogatory 41.

44. Identify all graphic materials used by, or in the possession of, MVPP or any of its members or consultants which tend to support Contention 16.

None

45. Will MVPP make the graphic material identified in response to interrogatory 40 voluntarily available to the NRC Staff for examination and copying during normal business hours in the greater Cincinnati metropolitan area?

Yes, if any come into MVPP's possession.

Dated: May 9, 1979

Leah S. Kosik

Leah S. Kosik
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