



1. Identify all persons by name, address, position and employment upon whom MVPP relies to substantiate their Contention Number 17.
2. Identify all experts by name, address, position and employment who may be called by MVPP as witnesses in this proceeding to substantiate their Contention Number 17.
3. Have each expert identified in Interrogatory 2 above summarize his testimony.
4. Identify by author, title, date and publication all graphic materials of any kind upon which MVPP or any of its advisors, consultants or experts relies to substantiate Contention Number 17.
5. Will MVPP voluntarily make all graphic materials identified in response to Interrogatory Number 4 above available to the NRC Staff for examination and copying?
6. Provide all independent calculations made by MVPP or their consultants, advisors or experts which may support their Contention Number 17 or their allegation that Kaowool caught fire when it was tested (Tr. p. 175, line 19).
7. Describe fully all physical and/or mathematical models used by MVPP or their consultants, advisors or experts to substantiate Contention Number 17.

8. Is Kaowool the fire insulation material referred to in Contention Number 17?

9. If the answer to Interrogatory Number 8 is yes, in whole or in part, provide the basis for your assertion that Kaowool will be used in the Zimmer facility.

10. Identify by raceway, bus, or cable tray where Kaowool will be, or is, used in the Zimmer facility.

11(a). Identify by time of day, date of month, year and geographic location where the "improperly performed" tests of fire insulation material were performed.

11(b). Who (what corporation or organization) performed the tests referred to above?

11(c). Who by name, title, position and corporate affiliation was present during the tests?

11(d). Describe, step by step, how the tests were performed, including a description of the physical and mechanical equipment used to perform the tests.

11(e). Describe the design basis scenario for which cable fire insulation protection is required for reactor safety.

11(f). Specify which plant cables require plant fire protection for reactor safety and why they are essential.

12. Identify with particularity which test (or tests) was improperly performed and describe the impropriety alleged to have occurred.

13. Describe how the design of the cable trays affects the performance of the fire insulation material.

14. Describe how the "cable tray load" affects the performance of the fire insulation material.

15. What "conditions . . . will exist during operation [that] were not adequately simulated" in the tests?

16. How will the non-simulated operation conditions affect the ability of the cables to be protected from fire and to perform their required function to transmit their required signals or energy?

17. What is the basis of the assertion that the test results were not documented (page 2, MVPP filing dated April 30, 1979)?

18. Identify the applicable standards for standard methods of fire tests of materials.

19(a). Has MVPP or its experts, advisors or consultants read, reviewed or seen Underwriters Laboratory Inc. File K 8758, Project 78 NK 5345, September 6, 1978, Report on Cable Raceway Protection Systems Fire Test Investigation?

19(b). Does MVPP have a copy of the aforesaid report in its possession or control?

19(c). If the answer to 19(a) or 19(b) is yes, then identify by page and paragraph the parts of said report that substantiate the allegation that the tests were improperly performed and describe the alleged improprieties.

19(d). Does MVPP or its consultants, advisors or experts have any graphic material other than the aforesaid report which demonstrate any impropriety in testing fire insulating material?

19(e). If the answer in whole or in part to Interrogatories 19(c) or 19(d) is yes, then identify by name and address the person concerned.

20. Identify by trade name and manufacturer the fire insulation material referred to in Contention 17.

21(a). State in detail the basis for MVPP's allegation that Kaowool caught fire when it was tested (Tr. p. 175, line 19).

21(b). At what temperature and pressure did the Kaowool catch fire?

21(c). Identify the test during which the Kaowool caught fire.

22. Are there industry standards for fire tests of material and if so identify them?

23. If there are industry standards for fire testing material, did the tests identified in Interrogatory Number 11 conform to these standards?

24. If the answer to Interrogatory 23 is not categorically affirmative, identify in all respects how the tests failed to conform to the aforesaid industry standards.

25. Set forth the results, in terms of fire protection and loss of cable function, of the tests identified in response to Interrogatory Number 11.

26. MVPP's filing of April 30, 1979, states that "Edwin Hofstadter, in a confidential manner, secured details of a test of the fire insulation material which show the material failed to pass the test."

(a). Does MVPP have, or have they had, access to the details of a test where the material failed to pass the test?

(b). If the reply to Interrogatory 26(a) is affirmative, then identify the test and set forth these details.

(c). Describe in detail the "test performance and standards" that the fire insulation material was supposed to pass.

27. Describe fully the environmental conditions, including mitigating facilities such as sprinklers and alarms, which MVPP alleges would properly test Kaowool and identify the deficiencies in these environmental conditions, including mitigating facilities, which made the tests improper; also identify which tests these were.

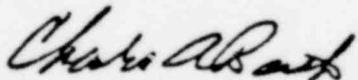
28. For each of the tests identified in response to Interrogatory Number 11 above, describe in detail the cables that were tested, i.e., size, length, type of material, load carried, etc.

29. For each of the tests identified in response to Interrogatory 11, identify the type of cable tray used.

30. Identify by name and address all persons known to you to support MVPP's allegations that the tests were improperly performed or that Kaowool failed to pass any of the tests identified in response to Interrogatory Number 1.

31. Identify for each Interrogatory by name, address and employment position all persons who wrote or substantially contributed to MVPP's response.

Respectfully submitted,

  
Charles A. Barth  
Counsel for NRC Staff

Dated at Bethesda, Maryland,  
this 22nd day of August, 1979.

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