NRC Central

April 20, 1979

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
CINCINNATI GAS AND ELECTRIC COMPANY, et al.	)	Docket No. 50-358
	)	
(Wm. H. Zimmer Nuclear Power Station, Unit No. 1)	)	

To: Leah S. Kosik, Esq.
3454 Cornell Place
Cincinnati, Ohio 45220

Counsel for Miami Valley Power Project

NRC STAFF INTERROGATORIES TO MIAMI VALLEY POWER PROJECT

Pursuant to 10 CFR §2.740b and the Order of the Licensing Board dated April 9, 1979, the NRC Staff hereby requires the Intervenor, Miami Valley Power Project (MVPP) to answer separately and fully, in writing and under oath or affirmation, the following Interrogatories on or before May 4, 1979.

On March 7, 1979 MVPP submitted two additional contentions which were admitted by the Licensing Board's Order of April 9, 1979 and in the Order the Board also admitted a third contention. Continuing the Applicant's numerical designation of contentions contained in its filing of December 5, 1978, the Staff will refer to the three most recently admitted contentions as contentions 14, 15 and 16. The Interrogatories relate to the contention which immediately precedes them.

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Contention 14

Cable trays containing electrical wires have been inadequately welded by improperly qualified welders and there have been inadequate testing of these welds.

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

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

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

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

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

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

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

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

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.

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

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

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

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

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

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

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.

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?

Contention 15

> Control rods which must be easily inserted into and removed from the reactor core have been inadequately manufactured so that they do not meet the size specifications for such control rods.

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

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

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

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

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

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

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

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

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

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.

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?

Contention 16

> Almost all of the seals on the control rods, which when properly set prevent radioactive water from leaking out when the reactor is shut down for maintenance, do not meet minimum specifications for smoothness. Rough seals cannot set properly, making servicing more difficult and unnecessarily endangering workers and the general public by causing leakage of radioactive water.

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.

30. How many control rods have defective seals?

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

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

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

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.

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

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

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

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

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

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

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

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

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

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

45. Will MVPP make the graphic materials 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?

Respectfully submitted,

Charles A. Barth

Charles A. Barth
Counsel for NRC Staff

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Dated at Bethesda, Maryland,
this 20th day of April, 1979.

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NUCLEAR REGULATORY COMMISSION

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CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF INTERROGATORIES TO MIAMI VALLEY POWER PROJECT" 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 by deposit in the Nuclear Regulatory Commission internal mail system, this 20th day of April, 1979:

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