



May 26, 1981



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
UNION ELECTRIC COMPANY)	Docket No. STN 50-483 OL
)	
(Callaway Plant, Unit 1))	

APPLICANT'S INTERROGATORIES AND
REQUESTS FOR DOCUMENT PRODUCTION (SET NO. 1)
TO JOINT INTERVENORS ON THEIR CONTENTION NO. 1

Applicant UNION ELECTRIC COMPANY hereby requests that each of the Joint Intervenors COALITION FOR THE ENVIRONMENT, ST. LOUIS REGION; MISSOURIANS FOR SAFE ENERGY; and the CRAWDAD ALLIANCE, pursuant to 10 CFR §§2.740b and 2.741, answer separately and fully, in writing under oath or affirmation, the following interrogatories and produce and permit inspection and copying of the original or best copy of all documents identified in the responses to interrogatories below, and that subsequent to filing answers to these interrogatories and producing documents therein identified, Joint Intervenors file supplemental responses and produce additional documents as required by 10 CFR §2.740(e). As set forth in the Special Pre-Hearing Conference Order of April 22, 1981, responses to these discovery requests are due no later than July 10, 1981; objections to interrogatories or the production of documents are to be served within fourteen (14) or (30) days, respectively, of the date of service of these requests. It will be acceptable if the

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Joint Intervenors choose to file a joint response to these requests provided that such responses include all information and all documents in the possession, custody or control of any of the Joint Intervenors.

Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addressee, date written or approved, and the name and address of the person(s) having possession of the document.

As used in these discovery requests the term "document(s)" includes publications of any format, letters, memoranda, notes, reports, analyses, test results or data, recordings, transcriptions and printed, typed or written materials of every kind in the possession, custody or control or within the knowledge of any of the Joint Intervenors or their counsel.

Joint Intervenors' Contention No. 1A (Embedded Plates)

1A-1. State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1A.

1A-2(a). State the name, address, title, employer and educational and professional qualifications of each person you intend to call as an expert witness on Contention No. 1A.

(b). State the subject matter on which each such person is expected to testify.

(c). State the substance of the facts and opinions to which each such person is expected to testify.

(d). State a summary of the grounds for such opinions, and identify all documents upon which such person relies to substantiate such opinions.

1A-3. State the name and address of each person not identified in response to the preceding interrogatory, who you intend to call as a witness on Contention No. 1A.

1A-4. Identify all documents in your possession, custody or control pertaining to the subject matter of Contention No. 1A.

1A-5. Identify all documents which you intend to offer as exhibits during this proceeding to support Contention No. 1A or which you intend to use during your cross-examination of witnesses presented by Union Electric Company and/or the NRC on Contention No. 1A.

1A-6(a). State the factual basis for your allegation in Contention No. 1A that the NRC and Union Electric Company "do not know where [the 480] plates are located in the plant."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1A-7(a). State the factual basis for your allegation in Contention No. 1A that the NRC and Union Electric Company "do not know what loads each plate must bear."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1A-8(a). State the factual basis for your allegation in Contention No. 1A that the NRC and Union Electric Company "do not know what the consequences of plate failure would be to the safe operation of the plant and to the health and safety of the public."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1A-9(a). State the factual basis for your allegation in Contention No. 1A that "many unused plates had to be repaired...or were returned to the manufacturer."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1A-10(a). State the factual basis for your allegation in Contention No. 1A that "[t]here is evidence of multiple defects on some plates."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1A-11(a). State the factual basis for your allegation in Contention No. 1A that "[d]uring the process of evaluating the question whether the embedded plates presented a safety significant problem, the Applicant improperly determined, with the NRC's apparent approval, that certain exceptions to structural welding code standards would be tolerated."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

(e). Identify the "structural welding code standards" to which you contend exceptions were tolerated.

(f). State the exact nature and degree of each alleged exception granted.

1A-12(a). State the factual basis for your allegation in Contention No. 1A that "inadequate and incomplete inspection and testing were performed."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

(e). Identify all inspections and testing which you contend should have been performed.

(f). State the factual basis for your contention that such inspections and testing should have been performed.

(g). Identify all documents you rely upon to support your contention that such inspections and/or testing identified in response to interrogatory no. 1A-12(e) should have been performed.

(h). State the name of each person you intend to call as a witness to support your contention that the inspections and/or testing identified in response to interrogatory no. 1A-12(e) should have been performed.

1A-13. State the name, present or last known address, and present or last known employer of the person identified as Individual "A" in NRC Report No. 50-483/77-10 referenced in your Contention No. 1A.

1A-14(a). Do you contend that the alleged problems with embedded plates as set forth in your Contention No. 1A constitute or in any way relate to a failure in the quality assurance program at the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the nature and degree of the alleged failure in the quality assurance program.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1A-15(a). Do you contend that the alleged problems with embedded plates as set forth in your Contention No. 1A will affect the safe operation of the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the manner and degree in which such safe operation will allegedly be affected.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e) [redacted] the name of each person you intend to call as a witness to support this contention.

1A-16. Identify and produce all correspondence and all written records of telephone conversations or meetings between any of the Joint Intervenors or Kay Drey and any employee of the NRC relating to the subject matter of your Contention No. 1A.

1A-17. Identify and produce all documents pertaining to the subject matter of your Contention No. 1A obtained from Union Electric Company or the NRC.

Joint Intervenors' Contention No. 3 (Concrete Cracks)

1B-1. State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1B.

1B-2(a). State the name, address, title, employer and educational and professional qualifications of each person you intend to call as an expert witness on Contention No. 1B.

(b). State the subject matter on which each such person is expected to testify.

(c). State the substance of the facts and opinions to which each such person is expected to testify.

(d). State a summary of the grounds for such opinions, and identify all documents upon which such person relies to substantiate such opinions.

1B-3. State the name and address of each person not identified in response to the preceding interrogatory, who you intend to call as a witness on Contention No. 1B.

1A-4. Identify all documents in your possession, custody or control pertaining to the subject matter of Contention No. 1B.

1B-5. Identify all documents which you intend to offer as exhibits during this proceeding to support Contention No. 1B or which you intend to use during your cross-examination of witnesses presented by Union Electric Company and/or the NRC on Contention No. 1B.

1B-6(a). State the factual basis for your allegation in Contention No. 1B (paragraph no. 1) that the "crack up to 1/4 inch wide... discovered in the Reactor Building in the reactor cavity moat area in May, 1977" will affect the safe operation of the Callaway Plant, specifying the manner and degree in which such safe operation will allegedly be affected.

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1B-7(a). State the factual basis for your allegation in Contention No. 1B (paragraph no. 2) that the "crack approximately 12 feet long and 8 inches deep" in the "north wall" of the Control Building will affect the safe operation of the Callaway Plant, specifying the manner and degree in which such safe operation will allegedly be affected.

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

(e). State the name, present or last known address, and present or last known employer of the Callaway Plant iron worker referred to in paragraph no. 2 of your Contention No. 1B.

1B-8(a). State the factual basis for your allegation in Contention No. 1B (paragraph no. 2) that the crack "apparently had been overlooked by the Applicant's quality assurance personnel."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1B-9(a). Do you contend that the concrete cracks referred to in paragraph nos. 1 and 2 in your Contention No. 1B constitute or in any way relate to a failure in the quality assurance program at the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the nature and degree of the alleged failure in the quality assurance program.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1B-10. Identify and produce all correspondence and all written records of telephone conversations or meetings between any of the Joint Intervenors or Kay Drey and any employee of the NRC relating to the subject matter of your Contention No. 1B.

1B-11. Identify and produce all documents pertaining to the subject matter of your Contention No. 1B obtained from Union Electric Company or the NRC.

Joint Intervenors' Contention No. 1C (Honeycombing)

1C-1. State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1C.

1C-2(a). State the name, address, title, employer and educational and professional qualifications of each person you intend to call as an expert witness on Contention No. 1C.

(b). State the subject matter on which each such person is expected to testify.

(c). State the substance of the facts and opinions to which each such person is expected to testify.

(d). State a summary of the grounds or such opinions, and identify all documents upon which such person relies to substantiate such opinions.

1C-3. State the name and address of each person not identified in response to the preceding interrogatory, who you intend to call as a witness on Contention No. 1C.

1C-4. Identify all documents in your possession, custody or control pertaining to the subject matter of Contention No. 1C.

1C-5. Identify all documents which you intend to offer as exhibits during this proceeding to support Contention No. 1C or which you intend to use during your cross-examination of witnesses presented by Union Electric Company and/or the NRC on Contention No. 1C.

1C-6(a). Do you contend that the honeycombing in the tendon access gallery of the reactor base mat (Contention No. 1C, paragraph no. 1) constitutes or in any way relates to a failure in the quality assurance program at the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the nature and degree of the alleged failure in the quality assurance program.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1C-7(a). Do you contend that the honeycombing in the tendon access gallery of the reactor base mat (Contention No. 1C, paragraph no. 1) will affect the safe operation of the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the manner and degree in which such safe operation will allegedly be affected.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1C-8(a). Do you contend that the honeycombing in the reactor building dome (Contention No. 1C, paragraph no. 2) constitutes or in any way relates to a failure in the quality assurance program at the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the nature and degree of the alleged failure in the quality assurance program.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1C-9(a). Do you contend that the honeycombing in the reactor building dome (Contention No. 1C, paragraph no. 2) will affect the safe operation of the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the manner and degree in which such safe operation will allegedly be affected.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1C-10(a). State the name, present or last known address, and present or last known employer of the "worker" who allegedly described the voids in reactor building base mat as being "big enough for man to crawl into" (Contention No. 1C, paragraph no. 1).

(b). Identify all documents containing statements by such worker pertaining to this incident and all documents pertaining or referring to the alleged statement by such worker.

1C-11(a). Please produce the letter of January 3, 1979, from James Keppler, Director, Region III, NRC to Kay Drey referred to in your Contention No. 1C, paragraph 1.

(b). Identify and produce all correspondence and all written records of telephone conversations or meetings between any of the Joint Intervenors or Kay Drey and any employee of the NRC relating to the subject matter of Contention No. 1C.

1C-12. Identify and produce all documents pertaining to the subject matter of your Contention No. 1C obtained from Union Electric Company or the NRC.

Joint Intervenors' Contention No. 1D (Concrete Coverage)

1D-1. State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1D.

1D-2(a). State the name, address, title, employer and educational and professional qualifications of each person you intend to call as an expert witness on Contention No. 1D.

(b). State the subject matter on which each such person is expected to testify.

(c). State the substance of the facts and opinions to which each such person is expected to testify.

(d). State a summary of the grounds for such opinions, and identify all documents upon which such person relies to substantiate such opinions.

1D-3. State the name and address of each person not identified in response to the preceding interrogatory, who you intend to call as a witness on Contention No. 1D.

1D-4. Identify all documents in your possession, custody or control pertaining to the subject matter of Contention No. 1D.

1D-5. Identify all documents which you intend to offer as exhibits during this proceeding to support Contention No. 1D or which you intend to use during your cross-examination of witnesses presented by Union Electric Company and/or the NRC on Contention No. 1D.

1D-6(a). Do you contend that the alleged failure of concrete coverage to "adhere to requirements" constitutes or in any way relates to a failure in the quality assurance program at the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention, specifying the nature and degree of the alleged failure in the quality assurance program.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1D-7(a). Do you contend that the alleged failure of concrete coverage to "adhere to requirements" will affect the safe operation of the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention, specifying the manner and degree in which such safe operation will allegedly be affected.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1D-8. Identify and produce all correspondence and all written records of telephone conversations or meetings between any of the Joint Intervenors or Kay Drey and any employee of the NRC relating to the subject matter of your Contention No. 1D.

1D-9. Identify and produce all documents pertaining to the subject matter of your Contention No. 1D obtained from Union Electric Company or the NRC.

Joint Intervenors' Contention No. 1E (Piping)

1E-1. State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1E.

1E-2(a). State the name, address, title, employer and educational and professional qualifications of each person you intend to call as an expert witness on Contention No. 1E.

(b). State the subject matter on which each such person is expected to testify.

(c). State the substance of the facts and opinions to which each such person is expected to testify.

(d). State a summary of the grounds for such opinions, and identify all documents upon which such person relies to substantiate such opinions.

1E-3. State the name and address of each person not identified in response to the preceding interrogatory, who you intend to call as a witness on Contention No. 1E.

1E-4. Identify all documents in your possession, custody or control pertaining to the subject matter of Contention No. 1E.

1E-5. Identify all documents which you intend to offer as exhibits during this proceeding to support Contention No. 1E or which you intend to use during your cross-examination of witnesses presented by Union Electric Company and/or the NRC on Contention No. 1E.

1E-6(a). State the factual basis for your allegation in Contention No. 1E that "[s]afety-related pipe installed at Callaway was manufactured by a company or companies which did not have adequate control of welding parameters."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a factual witness to support this allegation.

1E-7(a). State the factual basis for your allegation in Contention No. 1E that "[t]his resulted in known cases of defects which did not comply with the requirements of the American Society of Mechanical Engineers (ASME) Code."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

(e). Identify the specific requirements of the ASME Code you contend were not complied with.

1E-8(a). State the factual basis for your allegation in Contention No. 1E that "[t]he evaluation and acceptance of those defects and deficiencies were not done in accordance with the ASME Code."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

(e). Identify the specific requirements of the ASME Code you contend were not complied with.

1E-9(a). State the factual basis for your allegation in Contention No. 1E that "[t]he safety of pipe installed at Callaway remains in question and demands further investigation before an operating license should be issued."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1E-10(a). State the name, present or last known address, and present or last known employer of the pipe fitter who had allegedly

discovered and reported a substandard piece of ASME Class II SA-358 piping installed in the emergency core cooling system (Contention No. 1E, paragraph no. 1).

(b). Identify all documents containing statements by such pipefitter pertaining to this incident and all documents pertaining or referring to such statements.

1E-11(a). State the factual basis for your allegation in Contention No. 1E (paragraph no. 1) that "[t]he pipe was substantially out-of-round, was machined below the minimum wall, and had rejectable weld defects on the inside of a longitudinal seam weld."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1E-12(a). Do you contend that this alleged incident of the installation of an allegedly substandard piece of ASME Class II SA-358 piping (Contention No. 1E, paragraph no. 1) constitutes or in any way relates to a failure in the quality assurance program at the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the nature and degree of the alleged failure in the quality assurance program.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1E-13(a). Do you contend that this alleged incident of the installation of an allegedly substandard piece of ASME Class II SA-358 piping (Contention No. 1E, paragraph no. 1) will affect the safe operation of the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the manner and degree in which such safe operation will allegedly be affected.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1E-14(a). State the factual basis for your allegation in Contention No. 1E (paragraph no. 2) that "[s]ubstandard fusion welded SA-312 pipe manufactured by Youngstown Welding and Engineering Company...has been installed at the Callaway Plant."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1E-15(a). State the factual basis for your allegation in Contention No. 1E (paragraph no. 2) that "[t]he evaluation and acceptance of this substandard SA-312 piping were not performed according to the requirements of Section III of the ASME Code", identifying the specific sections of the ASME Code allegedly not complied with.

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1E-16(a). Do you contend that installation of this allegedly substandard SA-312 pipe and/or the subsequent evaluation and acceptance thereof (Contention No. 1E, paragraph no. 2) constitute or in any way relate to a failure in the quality assurance program at the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the nature and degree of the alleged failure in the quality assurance program.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1E-17(a). Do you contend that installation of this allegedly substandard SA-312 pipe and/or the subsequent evaluation and

acceptance thereof (Contention No. 1E, paragraph no. 2) will affect the safe operation of the Callaway Plant.

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention specifying the manner and degree in which such safe operation will allegedly be affected.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1E-18. Identify and produce all correspondence and all written records of telephone conversations or meetings between any of the Joint Intervenors or Kay Drey and any employee of the NRC relating to the subject matter of your Contention No. 1E.

1E-19. Identify and produce all documents pertaining to the subject matter of your Contention No. 1E obtained from Union Electric Company or the NRC.

Joint Intervenors' Contention No. 1F (Pre-assembly Piping Formations)

1F-1. State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the facts alleged in your Contention No. 1F.

1F-2(a). State the name, address, title, employer and educational and professional qualifications of each person you intend to call as an expert witness on Contention No. 1F.

(b). State the subject matter on which each such person is expected to testify.

(c). State the substance of the facts and opinions to which each such person is expected to testify.

(d). State a summary of the grounds for such opinions, and identify all documents upon which such person relies to substantiate such opinions.

1F-3. State the name and address of each person not identified in response to the preceding interrogatory, who you intend to call as a witness on Contention No. 1F.

1F-4. Identify all documents in your possession, custody or control pertaining to the subject matter of Contention No. 1F.

1F-5. Identify all documents which you intend to offer as exhibits during this proceeding to support Contention No. 1F or which you intend to use during your cross-examination of witnesses presented by Union Electric Company and/or the NRC on Contention No. 1F.

1F-6(a). State the factual basis for your allegation in Contention No. 1F that "pre-assembly piping formations with defective welds from Gulf & Western were accepted and were installed at Callaway."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1F-7(a). State the factual basis for your allegation in Contention No. 1F that "[a]fter installation it was also discovered that the vendor had used improper radiographic techniques."

(b). Identify all documents you rely upon to support this allegation.

(c). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for this allegation.

(d). State the name of each person you intend to call as a witness to support this allegation.

1F-8(a). Do you contend that the installation of pre-assembly piping formations with allegedly defective welds and/or that the vendor's alleged use of improper radiographic techniques (Contention No. 1F) constitute or in any way relate to a failure in the quality assurance program at the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention, specifying the nature and degree of the alleged failure in the quality assurance program.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1F-9(a). Do you contend that the installation of pre-assembly piping formations with allegedly defective welds and/or that the vendor's alleged use of improper radiographic techniques (Contention No. 1F) will affect the safe operation of the Callaway Plant?

(b). If the answer to the preceding interrogatory is affirmative or other than negative, state the factual basis for such contention, specifying the manner and degree in which such safe operation will allegedly be affected.

(c). Identify all documents you rely upon to support this contention.

(d). State the name, present or last known address, and present or last known employer of each person known to you to have first-hand knowledge of the factual basis for such contention.

(e). State the name of each person you intend to call as a witness to support this contention.

1F-10. Identify and produce all correspondence and all written records of telephone conversations or meetings between any of the Joint Intervenors or Kay Drey and any employee of the NRC relating to the subject matter of your Contention No. 1F.

1F-11. Identify and produce all documents pertaining to the subject matter of your Contention No. 1F obtained from Union Electric Company or the NRC.

General Interrogatories Pertaining To Contention Nos. 1A through 1F

A. State the name, title or position, address and employer of each person who provided information used in preparing responses to any of the foregoing interrogatories.

B. For each person identified in response to the preceding interrogatory, state the numbers of the interrogatories for which information was supplied.

C. State the name, title or position, address and employer of each person who searched for documents in order to respond to any of the foregoing requests for identification and production of documents.

D. For each person identified in response to the preceding interrogatory, state the numbers of the discovery requests for which the search was conducted and the location where the search was conducted.

E. Identify and produce any written or recorded statement of any individual pertaining to the subject matter of your Contention Nos. 1A through 1F, not previously identified in response to the foregoing discovery requests.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

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