



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) )

JOINT INTERVENORS' SECOND SET  
OF INTERROGATORIES TO NRC STAFF

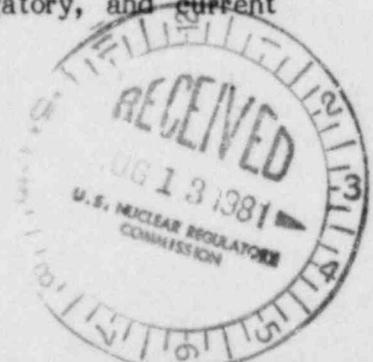
Joint Intervenors Coalition for the Environment St. Louis Region, Missourians for Safe Energy and Crawdad Alliance request that the attached interrogatories be answered fully, in writing and under oath by members of the NRC Staff who have personal knowledge thereof or are the closest to having personal knowledge thereof.

Unless otherwise stated all of the attached interrogatories relate to Union Electric Company's Callaway Plant Unit One. Nuclear Regulatory Commission is sometimes abbreviated "NRC". Union Electric Company is sometimes abbreviated "UE".

"Identify" or "Identification", when used with reference to a document or documents requires, in addition to whatever information is specifically requested, identification of the NRC document number (if applicable), a statement of the date of the document, the general nature and description of the subject matter and contents of the document, and the name(s) of the person(s) who prepared the document.

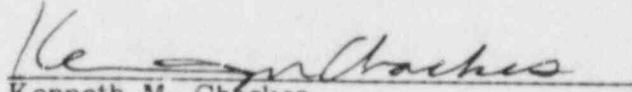
"Identify" or "Identification", when used with respect to a person or persons requires, in addition to whatever information is specifically requested, a statement of the full name, current or last known address and telephone number, employment and position as of the time period(s) relevant to the subject interrogatory, and current employment and position.

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50/11*



Joint Intervenors reserve their right to propound additional interrogatories pertaining to Contention No. 2 when the technical specifications, the FES and SER are available.

Respectfully submitted,  
CHACKES AND HOARE



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1. This interrogatory pertains to the following sentence in the NRC Staff Answer to Interrogatory No. 2: "Further review by the NRC will be performed during the FSAR review." Please describe the extent of that review.

2. State the date(s) on which the NRC Staff reviewed Union Electric's audit report of the Cives Steel Company; and describe the extent and time span of the NRC review (as per NRC Staff Answer to Interrogatory No. 3).

3. Specify the number of the crack in the "plant" north wall of the Control Building to which the NRC Staff Answer to Interrogatory 4 refers, using a number assigned by the Permittee to the cracks delineated in NCR-2-2081-C-A. Explain the source of the measurement of the width of the crack as per the NRC Staff Answer, namely, "one-sixteenth (1/16) inch at the widest place."

4. State whether the NRC requires an NRC Permittee to make a distinction between a visually detectable crack which extends through the depth of an exterior wall of a Q building, as compared with one visible on only one face of a wall, in its assessment of the crack's reportability and potential safety significance — that is, even if the crack width is below the one-sixteenth inch reportable size. Please explain the answer.

5. State whether the matter of flaking concrete referred to in Joint Intervenors' First Set of interrogatories numbers 68 and 69 has been closed, and identify all documents pertaining to the current status of this nonconformance.

6. In the "Answers to the NRC Staff to Joint Intervenors' First Set of Interrogatories . . ." in response No. 68, the Staff states that the listing submitted as Appendix B, entitled "NCR's Related to Concrete Placement 2C231W03," is being updated and that "any additional information will be provided" the Joint Intervenors. In addition to the supplementary response when available, please submit the following information:

- a. The list of 23 NCRs in Appendix B differs from 23 NCRs produced by the Applicant in response to Interrogatory No. 80 and Document Request No. 47 as follows: The NRC Staff does not list Number 2-1683-C-A or Number 2-1042-C-A in its list of 23 NCRs, although the Applicant included both in its document production in response to Document Request 47. On the other hand, the Applicant did not provide Number 2-1411-C-A or Number 2-1594-C-A among the 23 NCRs produced, though both are included in the NRC's Appendix B list. Please explain the disparity.
- b. NCR Number 2-1532-C-B is listed by the Applicant in response to Joint Intervenors' Interrogatory 81 as one of nine NCRs outstanding on November 21, 1977, but is not included in the NRC Staff's Appendix B and was not produced by Applicant in response to Interrogatory 80 as one of the 23 NCRs in the third list. Please explain.
- c. The NRC Staff Answer to Joint Intervenors' First Set of Interrogatories, Number 68 says that Attachment B provides the "disposition where known" of the nonconforming condition of each of the 23 NCRs according to data from the NCR forms. Explain how the NRC Staff knows that action was taken or completed in a timely manner -- that is, that the outstanding NCRs were "closed out" prior to concrete placement -- when the only information included in the "Statement of Completed Action" is either the comment "work completed per approved disposition," signed and dated a few days or months after the concrete pour, and/or "Hold Tag destroyed" or "Hold Tag lost in field," also signed and dated after the pour.
- d. State the time of day at which NRC Staff members Tom Vandell and Jim Foster left the Callaway site on November 21, 1977. State further

whether any evaluation records were written by them indicating the number or content of the NCRs which were still outstanding on Pour Number 2C231WO3, and whether any, if it were to remain uncorrected, could affect adversely the safety of the plant.

7. State whether NRC Staff members Eugene Gallagher and James Foster were accompanied by William Smart, ironworker, at the Callaway site on January 3, 1978, during the Staff's visual inspection of the fourth lift reinforcing steel placement of the Reactor Building exterior wall.

- a. If the answer is affirmative, explain why a mention of this date was omitted from NRC Report 78-01.
- b. State further whether the NRC Staff discussed with the Permittee or its representatives at that time or subsequently areas in which the steel was installed contrary to the specifications or drawings.
- c. If the answer to (b) is affirmative, describe such communication and any subsequent actions taken by the Permittee as a result.

8. This interrogatory pertains to the NRC Staff Answer to Joint Intervenors' First Set of Interrogatories, Number 62(a): State whether some of the reinforcing steel and concrete cover in dispute pertains also to vertical reinforcing steel.

9. Describe the range of variations from CC-3533.1 of Appendix C to BC-TOP-5 observed by the NRC Staff of reinforcing steel installed in the third and fourth lifts that led to the determination "that the deviations identified regarding concrete cover would have no adverse effect on the safety of the structure to perform under design conditions," as per the NRC Staff Answer Number 73.

10. In response to Joint Intervenors' Interrogatory No. 71 (Set One), Applicant states that "[o]n January 5, 1978, the NRC was conducting a special, announced investigation into allegations regarding, among other things, improper concrete cover for reinforcement."

- a. State whether on January 3, 1978, the NRC Staff also inspected the reinforcing steel which had been placed in the Reactor Building in preparation for the fourth lift of the exterior wall — that is, inspected those reinforcing bars and other materials which had been installed above the third lift following completion of the concrete pour of November 22, 1977.
- b. State whether the NRC Staff was accompanied by William Smart, Daniel ironworker, during an inspection on January 3, 1978, and/or any other inspection(s) of the fourth lift reinforcing steel. If the answer is affirmative, state the date(s) of each of the inspections.
- c. State the date(s), number of manhours, and results of each of the NRC Staff inspections of the fourth lift prior to the fourth lift pour.
- d. State the date of the fourth lift pour.
- e. If the answer to (b) above is affirmative, state whether the NRC Staff directed any questions verbally to representatives of Union Electric or its contractors during the inspection(s) or shortly thereafter regarding the placement of the reinforcing steel.
- f. If the answer to (e) above is affirmative, state whether any changes were made in the placement of the fourth lift reinforcing steel subsequent to the NRC Staff inspections in January 1978.
- g. If the answer to (f) above is affirmative, state the number of manhours expended by the Applicant on the replacement or reworking of the reinforcing steel.

11. A notice of violation attached to the cover letter of the Region III IE Report No. 50-483/81-04 refers to a "Severity Level V Violation [Supplement II]".

- a. Explain the significance of the Severity Level V Violation.
- b. Also explain the significance of all other levels of violation.

- c. Identify the document Supplement II supplement and provide a copy of Supplement II.
- d. Were any actions taken against the vendors, suppliers or manufacturers involved with the acceptance of unacceptable indications cited in this notice of violation? If so, what actions were taken and against whom were they taken?

12. A Bechtel Power Corporation report dated November 28, 1979 and titled, "Final Report of Gulf & Western Preassembled Formations for Callaway Plant Unit One [Union Electric] and Wolf Creek [Kansas Gas and Electric]" concerns rejectable indications found in welds of preassembled piping formations.

- a. Has the NRC investigated any of the deficiencies or noncompliances cited in this report?
- b. Did any of the deficiencies or noncompliances cited in this report indicate possible or actual violation of the criteria of 10 CFR Part 50, Appendix B?
- c. Has the surveillance and inspection of any supply items for the Callaway Plant by Bechtel and Code Authorized Nuclear Inspectors been sufficient to assure the structural integrity of safety related items?
- d. State separately for each question the factual basis for the answer and identify all documents on which you rely in the answers to questions (a), (b) and (c) above.

13. Identify, separately for each of the above interrogatories and subparts thereof, the person(s) providing the answer.

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CERTIFICATE OF SERVICE

I hereby certify that copies of the Joint Intervenors' Second Set of Interrogatories to Union Electric, Joint Intervenors' Second Set of Interrogatories to NRC Staff and Joint Intervenors' Second Request for Production of Documents to Union Electric have been served on the following by deposit in the United States mail this 10th day of August, 1981.

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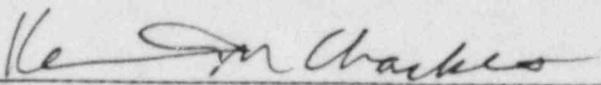
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