

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
DOCKETING  
USNRC

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OFFICE OF SECRETARY  
DOCKETING & SERVICE  
DOCKETING BRANCH

In the Matter of )

PUBLIC SERVICE COMPANY OF )  
NEW HAMPSHIRE, et al. )

(Seabrook Station, Units 1 )  
and 2) )

Docket Nos. 50-443  
50-444

10/13/82

NECNP FIRST SET OF INTERROGATORIES AND  
REQUEST FOR DOCUMENTS TO THE NRC STAFF  
ON CONTENTIONS II.B.1, II.B.3, II.B.4, and II.B.5

INSTRUCTIONS FOR USE

The following interrogatories are to be answered in writing and under oath by an employee, representative or agent of the NRC Staff with personal knowledge of the facts or information requested in each interrogatory.

The following definitions shall apply to these interrogatories:

1. "Document" shall mean any written or graphic matter of communication, however produced or reproduced, and is intended to be comprehensive and include without limitation any and all correspondence, letters, telegrams, agreements, notes, contracts, instructions, reports, demands, memoranda, data, schedules, notices, work papers, recordings, whether electronic or by other means, computer data, computer print-outs, photographs, microfilm, microfiche, charts, analyses, intra-corporate or intra-office communications, notebooks, diaries, sketches, diagrams, forms, manuals, brochures, lists, publications, drafts, telephone minutes, minutes of meetings, statements, calendars, journals, orders, confirmations and all other written or graphic materials of any nature whatsoever.

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2. "Identify" shall mean with respect to any document, to state the following respecting the document: its title, its date, the author of the document, the person to whom the document was sent, all persons who received or reviewed the document, the substance and nature of the document, and the present custodian of the document and of any and all copies of the document.

3. "Identify" with respect to any action or conduct shall mean state the following regarding any such action or conduct: the person or persons proposing and taking such action; the date such action was proposed and/or taken; all persons with knowledge or information about such action; the purpose or proposed effect of such action; any document recording or documenting such action.

4. "Describe" with respect to any action or matter shall mean state the following regarding such action or matter: the substance or nature of such action or matter; the persons participating in or having knowledge of such action or matter; the current and past business positions and addresses of such persons; the existence and location of any and all documents relating to such action or matter.

#### Contention II.B.1.

1. What is the NRC Staff's position with respect to NECNP Contention II.B.1.? State all facts and opinions and identify and provide access to all documents on which that position is based.

2. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention II.B.1., and identify all documents on which the NRC Staff expects to rely at the hearing with respect to this contention.

3. For each of the criteria of Appendix B to 10 CFR Part 50, identify where the NRC Staff believes the FSAR addresses the criterion.

Contention II.B.3.

4. What is the NRC Staff's position with respect to NECNP Contention II.B.3.? State all facts and opinions and identify and provide access to all documents on which that position is based.

5. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention II.B.3., and identify all documents on which the NRC Staff expects to rely at the hearing with respect to this contention.

6. Describe the NRC Staff's understanding of the responsibilities and functions of the Executive Vice President - Engineering and Production.

a. Describe the NRC Staff's understanding of the the daily activities of the Executive Vice President - Engineering and Production.

7. Describe the NRC Staff's understanding of the responsibilities and function of the Vice President - Production.

a. Describe the NRC Staff's understanding of the daily activities of the Vice President - Production.

8. Describe the NRC Staff's understanding of the responsibilities and functions of the Nuclear Quality Manager.

a. Describe the NRC Staff's understanding of the daily activities of the Nuclear Quality Manager.

9. Describe the NRC Staff's understanding of the responsibilities and functions of the Quality Supervisor.

a. Describe the NRC Staff's understanding of the daily activities of the Quality Supervisor.

10. Describe the NRC Staff's understanding of the responsibilities and functions of the Nuclear Production Superintendent.

a. Describe the NRC Staff's understanding of the daily activities of the Nuclear Production Superintendent.

11. Describe the NRC Staff's understanding of the responsibilities and functions of the Station Manager.

a. Describe the NRC Staff's understanding of the daily activities of the Station Manager.

12. Describe the NRC Staff's understanding of the responsibilities and functions of the Nuclear Production Operations Support Manager.

a. Describe the NRC Staff's understanding of the daily activities of the Nuclear Production Operations Support Manager.

13. Describe the NRC Staff's understanding of the responsibilities and functions of the Nuclear Production Engineer Manager.

a. Describe the NRC Staff's understanding of the daily activities of the Nuclear Production Engineering Manager.

14. Describe the NRC Staff's understanding of the responsibilities and functions of the Training Center Manager.

a. Describe the NRC Staff's understanding of the daily activities of the Training Center Manager.

15. Describe the NRC Staff's understanding of the responsibilities and functions of the Compliance Manager.

a. Describe the NRC Staff's understanding of the daily activities of the Compliance Manager.

16. To the knowledge of the NRC Staff, does the Executive Vice President - Engineering and Production have any QA duties that are unique to that position and may not be delegated? If so, please describe those duties and identify the personnel with whom the Executive Vice President - Engineering and Production would interact in the course of carrying out those duties, if known by the NRC Staff.

17. To the knowledge of the NRC Staff, does the Vice President - Production have any QA duties that are unique to that position and may not be delegated? If so, please describe those duties and identify the personnel with whom the Vice President - Production would interact in the course of carrying out those duties, if known by the NRC Staff.

18. The FSAR states at page 17.2-1 that "The Vice President -Production will mediate disputes arising within the OQAP."

a. What sorts of disputes does the NRC Staff understand are referred to in this sentence?

19. Identify the NRC Staff's understanding of each situation in which personnel in the OQAP interact with personnel involved in Nuclear Production (NP) as described in the FSAR at page 17.2-4.

a. In each case, identify the positions of the personnel in question.

b. In each case, describe how and by whom disputes between OQAP and NP personnel are resolved, if known by the NRC Staff.

20. Identify all personnel whom the NRC Staff understands to have stop work authority.

a. In each case, explain how and by whom the stop work order may be lifted, both when the originator agrees that it should be lifted and when the originator does not believe the stop work order should be lifted, if known by the NRC Staff.

Contention II.B.4.

21. What is the NRC Staff's position with respect to NECNP Contention II.B.4.? State all facts and opinions and identify and provide access to all documents on which this position is based.

22. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention II.B.4., and identify all documents on which the NRC Staff expects to rely at the hearing with respect to this contention.

23. Describe the NRC Staff's understanding of the actions that will be taken by Applicants to assure that replacement materials and replacement parts incorporated into structures, systems, or components important to safety will be equivalent to the original equipment (or otherwise in compliance with applicable standards and regulations), installed in accordance with proper procedures and requirements, and otherwise adequate to protect the public health and safety.

a. Identify the personnel whom the NRC Staff understands will be responsible for this activity.

24. Describe the NRC Staff's understanding of the actions that will be taken by Applicants to assure that repairs or rework carried out on structures, systems, or components important to safety will comply with all applicable standards and regulations.

a. Identify the personnel whom the NRC Staff understands will be responsible for this activity.

Contention II.B.5.

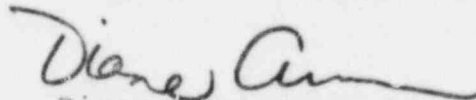
25. What is the NRC Staff's position with respect to NECNP Contention II.B.5.? State all facts and opinions and identify and provide access to all documents on which that position is based.

26. Identify all individuals whom the NRC Staff expects to call as witnesses with respect to NECNP Contention II.B.5., and identify all documents on which the NRC Staff expects to rely at the hearing with respect to this contention.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that copies of NECNP FIRST SET OF INTERROGATORIES AND REQUEST FOR DOCUMENTS TO APPLICANTS and NECNP FIRST SET OF INTERROGATORIES AND REQUEST FOR DOCUMENTS TO THE NRC STAFF ON CONTENTIONS I.A.2, I.B.1, I.B.2, AND I.C.; and NECNP FIRST SET OF INTERROGATORIES AND REQUEST FOR DOCUMENTS TO APPLICANTS and NECNP FIRST SET OF INTERROGATORIES AND REQUEST FOR DOCUMENTS TO THE NRC STAFF ON CONTENTIONS II.B.1., II.B.3., II.B.4., AND II.B.5., have been mailed this 13th day of October 1982, first-class mail, postage pre-paid.

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