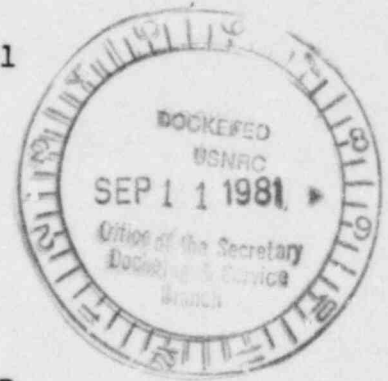


September 10, 1981



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 RESPONSE TO  
JOINT INTERVENORS' SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS TO UNION ELECTRIC

Pursuant to 10 C.F.R. §2.741(d), Applicant hereby responds to Joint Intervenors' Second Request for Production of Documents to Union Electric by stating that the documents in the possession, custody, or control of the Union Electric Company, the production of which have been requested by Joint Intervenors, will be made available, except for those documents noted below, to Joint Intervenors for inspection and copying in the following manner.

The requested documents will be made available in the offices of Union Electric Company, 1901 Gratiot Street, St. Louis, Missouri. Applicant objects to Joint Intervenors'

document production request to the extent that it seeks the production at the office of Joint Intervenors' counsel.

The documents will be made available during Union Electric business hours (or such other mutually agreeable time). Appointments to inspect the documents may be arranged by telephoning Charles A. Bremer at 621-3222, at least 24 hours before the requested inspection. Applicant will maintain the requested documents assembled in Union Electric's offices, available for inspection by Joint Intervenors, for a reasonable time (i.e., until October 9, 1981), after which they will be returned to their place of origin.

Inspected documents which Joint Intervenors wish to have copied will be reproduced by Union Electric Company on a schedule compatible with other demands for duplicating equipment. A Union Electric Company employee will be available during the inspection in order to receive any requests for copying. Copies of such selected documents will then be furnished to Joint Intervenors upon payment of 15 cents per page, to meet Union Electric Company's cost of reproduction.

Applicant will not produce the following requested documents, for the reasons stated.

DOCUMENT REQUEST No. 20: Provide copies of any correspondence or reports involving Chicago Bridge and Steel with regard to the testing of the liner plate as a result of the discovery of the Reactor Cavity Moat Area crack.

RESPONSE: No additional testing of the liner plate was required as a result of the reactor cavity moat area crack; therefore, no such correspondence or reports exist.

DOCUMENT REQUEST No. 28: Provide any documents which specify or discuss the nonconformances about which the nine NCRs were written which were still outstanding as of November 21, 1977 (pertaining to the third lift of the Reactor Building Wall).

RESPONSE: No such documents are in Applicant's possession, custody or control.

DOCUMENT REQUEST No. 29: Provide any correspondence or reports between any or all of the following: Union Electric, Bechtel, Daniel International, SNUPPS, or the NRC, relating to the scheduling of or decision to proceed with the concrete placement of the third lift of the Reactor Building.

RESPONSE: Applicant is unaware of any such documents, other than the normal construction schedule. It should be noted that the issue of concrete cover tolerances had not been raised at the time that the third lift was placed.

DOCUMENT REQUEST No. 54: Union Electric letter ULS-2198, dated May 1, 1978.

RESPONSE: Applicant objects to the production of the requested document in that it is not relevant to the matters in controversy; further, production

of the requested document will not lead to the discovery of admissible evidence.

Additionally, Applicant offers the following explanations with respect to certain of Joint Intervenors' document requests.

DOCUMENT REQUEST No. 38: NCR No. 2-1532-C-B.

RESPONSE: The requested document will be produced pursuant to Document Request No. 27.

DOCUMENT REQUEST No. 39: NCR No. 2-1582-C-B.

RESPONSE: The requested document will be produced pursuant to Document Request No. 26.

DOCUMENT REQUEST No. 45: Provide a copy of the nonconformance report regarding the longitudinal cracks in #18 bars installed in the Turbine Pedestal legs as mentioned on page one of the Bechtel Trip Report dated May 10-11, 1977, Job Number 10884-001; also provide copies of correspondence or other notification report issued to Paper Calmenson and Bechtel Inspection advising them "to reject such bars before they are shipped."

RESPONSE: The nonconformance report and any correspondence regarding the #18 bars installed in the turbine pedestal legs will be produced pursuant to Document Request No. 46.

DOCUMENT REQUEST No. 49: The final cost impact statement submitted by Daniel To Union Electric regarding the cost of repairing the honeycombing in the Tendon Access Gallery.

RESPONSE: Daniel International Corporation did not submit a separate cost statement for the tendon access gallery repairs. The number of manhours required to complete this work is given in Applicant's Answer to Joint Intervenors' Interrogatory Nos. 11(a) and 12(d), Second Set.

DOCUMENT REQUEST No. 55: The Quality Assurance Manual(s) for all the organizations designated as the N, NPT, and NA certificate holders for the Callaway Plant as defined by the ASME Code Section III, Articles NA-3000 and NA-4000.

RESPONSE: Daniel International Corporation is the only certificate holder for the Callaway Plant, whose Quality Assurance Manual is within Applicant's possession, custody or control. A copy of the Daniel International Corporation Quality Assurance Manual will be produced.

DOCUMENT REQUEST No. 56: All documents identified in Applicant's Answers to Joint Intervenors' Second Set of Interrogatories to Union Electric.

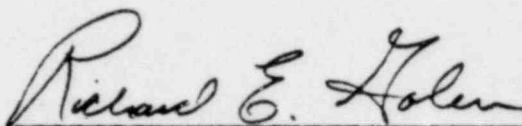
RESPONSE: Applicant will produce those documents, not previously produced to Joint Intervenors, identified in Applicant's responses to the following interrogatories (Second Set):

No. 1(e)  
No. 15  
No. 19(a) and (c)  
No. 20(c)(f) and (g)

No. 21(c) and (h)  
No. 22(d)  
No. 24(k) and (n)

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE



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Thomas A. Baxter  
Richard E. Galen

Counsel for Applicant

1800 M Street, N.W.  
Washington, D.C. 20036  
(202) 822-1000