

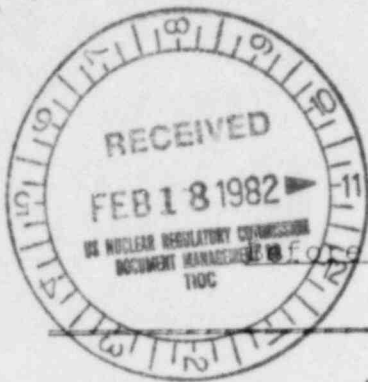
RELATED CORRESPONDENCE

WED-02/10/82-P:50266NBC-P29

RECEIVED

'82 FEB 17 10:25

emp



UNITED STATES OF AMERICA

NUCLEAR REGULATORY COMMISSION

before the Atomic Safety and Licensing Board

Wisconsin Electric Power Company
 POINT BEACH NUCLEAR PLANT UNITS 1 & 2
 DOCKET NOS. 50-266 AND 50-301
 Operating License Amendment
 (Steam Generator Tube Sleeving Program)

DECADE'S FIRST INTERROGATORIES AND
 REQUEST FOR PRODUCTION OF DOCUMENTS TO LICENSEE
 ON THE FULL SCALE SLEEVING PROGRAM

Pursuant to 10 C.F.R. §720, the Licensee, WISCONSIN ELECTRIC POWER COMPANY, is herein required to answer the following interrogatories and to produce the following documents and to serve a copy of the documents and its answers and objections, if any, upon Peter Anderson, Director of Public Affairs, Wisconsin's Environmental Decade, 114 North Carroll Street, Madison, Wisconsin 53703.

INSTRUCTIONS

1. Answer each interrogatory separately and fully in writing under oath, unless it is objected to, in which event the reasons for objection must be stated in lieu of an answer.
2. An evasive or incomplete answer is deemed to be a failure to answer.
3. You are under a continuing duty to seasonably supplement your response with respect to any questions directly addressed to the identity and location of persons having knowledge of

*DS03
50/1*

discoverable matters, and the identity of each person expected to be called as an expert witness at hearing. Furthermore, you are under a similar duty to correct any incorrect response when you later learn that it is incorrect and to supplement your response with new information.

4. Whenever in these instructions or interrogatories a request is made to identify a person(s) or source(s), state the name(s), and the last known address.

5. Whenever in these instructions or interrogatories a request is made to "list", "describe", or "identify" documents, those terms shall be interpreted as a request to provide the documents, or, if the documents cannot for good cause be produced, to supply as to each document the following information where such information is appropriate for each document:

- (a) The type of document (e.g., letter, memorandum, report, study, etc.);
- (b) The date of the document;
- (c) The name(s) of the signer(s) of the document;
- (d) The present whereabouts of the document or copy thereof and the name and address of the custodian thereof;
- (e) A brief summary of the subject matter of the document; and

6. As used in these instructions or interrogatories, the term "document" is used in a comprehensive sense and includes, without limiting its generality of meaning, all written, typed, printed, transcribed or graphic or electronically recorded materials.

7. Whenever in these interrogatories a request is made to

state any facts, basis and/or information, in addition to stating the requested facts, basis and/or information, identify the natural person(s) most knowledgeable as to such fact, basis and/or information and list all documents which relate to any such fact, basis and/or information, whether or not such person(s) is in the employe or under the direct control of the person answering these interrogatories.

8. Whenever in answer to these interrogatories which seek all information concerning a subject, the answer includes a specific reference or references, clearly state whether there is any other information responsive to the interrogatory not included in the answer.

9. Whenever in answer to these interrogatories or request for production of documents a claim of privilege is asserted, state the grounds on which the claim is asserted and also clearly identify the matters or documents for which the privilege is claimed, the general subject matter of the matters or documents and the name and address of persons receiving copies of the document, if any.

10. All portions of these "Instructions" shall be deemed to be part of these interrogatories and request for production of documents.

INTERROGATORIES

Part A

Part A Interrogatories seeks to determine facts bearing on whether and the extent to which operational modifications intended to reduce steam generator tube degradation may have an adverse effect on reactor vessel embrittlement or thermal shock and visa-versa.

1. Describe all changes in operating parameters at Point Beach Nuclear Plant which have been undertaken or which are presently planned to be undertaken in the future in order to reduce or alleviate steam generator tube degradation subsequent to August 1, 1979.
2. State any and all studies, analyses or consideration of any kind given to the direct or indirect effect of any change in operating parameters undertaken or planned to be undertaken to reduce or alleviate steam generator tube degradation on reactor vessel embrittlement or thermal shock.
3. Describe all changes in operating parameters at Point Beach Nuclear Plant which have been undertaken or which are planned to be undertaken in the future in order to reduce or alleviate reactor vessel embrittlement or thermal shock.
4. State any and all studies, analyses or consideration of any kind given to the direct or indirect effect of any change in operating parameters undertaken or planned to be undertaken to reduce or alleviate reactor vessel embrittlement or thermal shock on steam generator tube degradation.

Part B

Part B interrogatories seek facts to determine whether new mechanisms for degradation may arise from the full scale sleeving program.

5. State any and all studies, analyses or consideration of any kind given to the possibility of physical contact between the sleeve and/or tube between the upper and lower joint, including but not limited to the possibility of resulting degradation to the sleeve and/or tube.

6. State any and all studies, analyses or consideration of any kind given to the possibility of galvanic corrosion occurring in the sleeved steam generator tubes, apart from that specifically described in the Licensee's October 27, 1981 Response to Decade's First Interrogatories on Demonstration Sleeving Program, at ¶8.

7. State the preliminary and final results of tests performed (i) to demonstrate the corrosion and/or cracking resistance of thermally treated Inconel 600 to primary and/or water, (ii) verify the corrosion and/or cracking resistance of the transition of the lower joint of the sleeve, (iii) to verify the corrosion and/or cracking resistance of the upper joint of the sleeve; (iv) to verify leak limiting capabilities of the upper joint of the sleeve, (v) to verify the structural strength and leak tightness of the upper and lower joint of the sleeve after cyclical loading and during accident conditions, (vi) to verify the internal pressure capabilities of sleeve joint, and (vii) any and all tests related to sleeving either not specifically referenced in the Sleeving Report and/or commenced subsequent to preparation of the Sleeving Report; and, with

respect to each of the foregoing, provide all details of the tests, if any.

8. State any and all studies, analyses or consideration of any kind given to the environment of either primary or secondary water in the annulus between the sleeve and the tube and/or to the potential corrosive processes that might occur in that environment, apart from that specifically stated in Section 6.1 of the Sleeving Report or in Section 6.1 of the San Onofre Repair Report.

9. State any and all studies, analyses or consideration of any kind given to the effect of the process which joins the sleeve to the tube on the structural integrity of the sleeve or tube, individually or in combination, apart from that specifically stated in Section 6.1 of the Sleeving Report or in Section 6.1 of the San Onofre Repair Report.

Part C

Part C interrogatories seek information related to the inspectability of sleeved tubes.

10. State any and all studies, analyses or consideration of any kind given to the inspectability and the accuracy of inspections of sleeved tubes, including but not limited to any results of inspection of sleeved tubes in the field at any nuclear electric generating plant, apart from that specifically stated in Section 7 of the Sleeving Report or Section 7 of the San Onofre Repair Report.

Part D

Part D interrogatories seek information related to the adequacy of quality/assurance control in the installation of sleeves by transient employees.

11. State the names, last known address, and job title of all persons who were employed by the Licensee or its contractors or subcontractors to perform the fall 1981 demonstration sleeving program at Point Beach Nuclear Plant Unit 1.

12. State whether any persons employed to perform the fall 1981 demonstration sleeving program at Point Beach Nuclear Plant Unit 1 were observed or were reported to have violated any of the plant's rules or procedures and provide all details of any such violation.

Part E

Part E interrogatories seek information concerning the effects of tube defects in the free standing region of the steam generator.

13. Please list all defects in steam generator tubes at Point Beach Nuclear Plant by unit, steam generator, row, column, date observed, and percent defect observed, which were at a height of 22" or higher from tube end subsequent to 1975.

14. State any and all studies, analyses or consideration of any kind given to observed defects in steam generator tubes at a height of 22" or higher from the tube end subsequent to 1975.

Part F

Part F interrogatories seek information on the problem of loose plugs during accident conditions.

15. Please list all leaking plugs observed at Point Beach Nuclear Plant by unit, steam generator, row, column, and date observed.

16. State any and all studies, analyses or consideration of

any kind given to leaking plugs.

Part G

Part G interrogatories seek information concerning the details of the demonstration sleeving program.

17. State any and all studies, analyses or consideration of the fall 1981 demonstration sleeving program at Point Beach Nuclear Plant Unit 1, apart from that included in the Sleeving Demonstration Report.

18. State the primary-to-secondary observed leak rate in Point Beach Nuclear Plant Unit 1 subsequent to completion of the fall 1981 sleeving demonstration program, including but not limited to the daily variation in such leak rate.

19. State the precise nature of the difficulty in verifying the acceptability of the cold leg of tube R27C49 after removing the explosive plug, including but not limited to the reason for difficulty in verifying that 40% tube wall thickness remained.

PRODUCTION OF DOCUMENTS

1. Produce copies of each document referenced in the answers to the foregoing interrogatories except for those documents which are a part of these proceedings or the proceedings in PSCW Docket 6630-CE-20, 6630-UI-2 or 6630-ER-10.

DATED at Madison, Wisconsin, this 10th day of February, 1982.

WISCONSIN'S ENVIRONMENTAL DECADE, INC.

By Original Signed by
Peter Anderson
PETER ANDERSON
Director of Public Affairs

114 North Carroll Street
Suite 208
Madison, Wisconsin 53703
(608) 251-7020