

10367

RELATED CORRESPONDENCE

DOCKETED  
USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD

'90 MAY 17 P4:03

OFFICE OF SECRETARY  
DOCKETS & SERVICE  
BRANCH

|                         |   |                         |
|-------------------------|---|-------------------------|
| In the Matter of        | ) |                         |
|                         | ) |                         |
| VERMONT YANKEE NUCLEAR  | ) | Docket No. 50-271-OLA-4 |
| POWER CORPORATION       | ) | (Operating License      |
|                         | ) | Extension)              |
| (Vermont Yankee Nuclear | ) |                         |
| Power Station)          | ) |                         |

DOCUMENT PRODUCTION REQUEST  
PROPOUNDED BY THE STATE OF VERMONT  
TO THE  
VERMONT YANKEE NUCLEAR POWER CORPORATION  
(Set No. 2)

Pursuant to 10 C.F.R. § 2.741, the State of Vermont hereby propounds the following document production request to the Vermont Yankee Nuclear Power Corporation.

DEFINITIONS

1. "Document" as used herein is used in its broadest sense as expressed in Rule 34(a) of the Federal Rules of Civil Procedure, and specifically includes copies of every instrument or device by which, through which, or on which information has been recorded, including those reflecting meetings, discussions or conversations: notes; letters; memoranda (including internal Vermont Yankee Nuclear Power Corporation memoranda); manifests; tables; drawings; files; graphs; charts; maps; photographs; deeds; studies; data sheets; notebooks; books; appointment calendars; telephone bills; telephone messages; receipts; vouchers; minutes of meetings; pamphlets; computations; calculations; accounting statements; financial statements; voice recordings; computer printouts and disks; or any other device or media on which or through which information of any type is transmitted, recorded, or preserved. The term "document" also means every copy of a document when such copy is not an identical duplicate of the original.

9005220377 900514  
PDR ADOCK 05000271  
G PDR

DS 03

2. "Vermont Yankee" and "licensee" each refer to Vermont Yankee Nuclear Power Corporation, its predecessors, successors, parents, subsidiaries, affiliates, segments or divisions, including all past and present officers, directors, employees, agents or members of the Board of Directors of Vermont Yankee.

### INSTRUCTIONS

1. The response to each sub-part of the Document Request is to be numbered in a manner consistent with the Document Request.

2. In responding to this Document Request, furnish all responsive information that is available to Vermont Yankee, including information that is in the possession of any of Vermont Yankee's officers, employees, agents, contractors, consultants, assigns and attorneys or otherwise subject to Vermont Yankee's custody or control.

3. If any requested document was but is no longer in your possession or subject to your control, state what disposition was made of it.

4. If any Document Request cannot be provided in full, it shall be provided to the extent possible, and an explanation shall be given as to why a full provision is not possible.

5. If only part of a document is responsive to a Document Request and the entire document is produced, the responsive section of the document shall be indicated.

6. If anything is deleted from a document produced in response to a Document Request, Vermont Yankee shall state the reason for the deletion and the subject matter of the deleted material.

7. If any requested document or information is withheld pursuant to an objection or claim of privilege, Vermont Yankee shall identify the specific Document Request (including subparagraph) requesting the withheld document or information, state the nature of the objection or privilege and the precise grounds upon which the objection is made or the privilege is claimed.

8. If an objection is made or a privilege is claimed as to any requested information, identify each person who has knowledge of such information.

9. If any document is not produced because Vermont Yankee has not retained it or because it is being withheld pursuant to an objection or claim of privilege, Vermont Yankee shall identify the document by stating:

- (a) the name(s) and affiliation(s) of the document's author(s) or originator(s);
- (b) the name(s) and affiliation(s) of the document's addressee(s);
- (c) the document's date;
- (d) the document's title or heading;
- (e) the document's type (e.g., letter, contract);
- (f) the document's subject matter;
- (g) the name(s) and affiliation(s) of the present or last known custodian(s) of the original document or copies thereof;
- (h) the current or last known business and residential addresses of such custodian(s); and
- (i) the name(s) and affiliation(s) of all recipients of copies of the document.

10. If any Document Request is objected to in part, for any reason, the remainder of the Document Request is to be provided in full.

11. All responses must be supplemented as provided for in 10 C.F.R. § 2.740(e).

12. Documents are requested for production for inspection and copying in accordance with 10 C.F.R. § 2.741.

### DOCUMENT PRODUCTION REQUEST

Please produce for inspection and copying all of the Institute of Nuclear Power Operations (INPO) documents identified below:

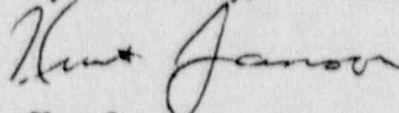
| <u>Document</u> | <u>Title</u>   |
|-----------------|--|
| 1. INPO 82-001  | Reduction of PWR Radiation Level Buildup by Maintenance of High Reactor Coolant PH |
| 2. INPO 82-002  | Maintenance History Program (MA-310)   |
| 3. INPO 82-002  | Snubber Maintenance Program (MA-313)   |



|     | <u>Document</u> | <u>Title</u>   |
|-----|-----------------|--|
| 4.  | INPO 83-024     | Planned Valve Repacking as Preventive Maintenance  |
| 5.  | INPO 83-045     | Plant Material Deficiency Identification   |
| 6.  | INPO 83-04      | Component Verification and System Validation Guidelines                                  |
| 7.  | INPO 84-010     | Vendor Equipment Technical Information Program   |
| 8.  | INPO 84-025     | Operation Surveillance Program   |
| 9.  | INPO 84-026     | Setpoint Change Control Program  |
| 10. | INPO 84-028     | Control of Vendor Manuals  |
| 11. | INPO 85-001     | Performance Objectives and Criteria for Operating and Near-term Operating License Plants |
| 12. | INPO 85-010     | Surveillance and Periodic Task Scheduling Program  |
| 13. | INPO 85-013     | Plant Modification Control Program   |
| 14. | INPO 85-016     | Temporary Modification Control   |
| 15. | INPO 85-026     | Writing Guideline for Maintenance, Test and Calibration Procedures                       |
| 16. | INPO 85-031     | Guidelines for the Conduct of Technical Support Activities at Nuclear Power Stations     |
| 17. | INPO 85-032     | Preventive Maintenance   |
| 18. | INPO 85-038     | Guidelines for the Conduct of Maintenance at Nuclear Power Stations                      |
| 19. | INPO 86-002     | Maintenance History Program  |

| <u>Document</u>        | <u>Title</u>   |
|------------------------|--|
| 20. INPO 86-014        | Snubber Maintenance Program  |
| 21. INPO 86-018        | Guidelines for Training and Qualification of Maintenance Personnel |
| 22. INPO 87-009        | Control of Vendor Manuals  |
| 23. INPO 87-028        | Post-Maintenance Testing   |
| 24. INPO 88-022        | Vendor Manual Specification and Procurement                        |
| 25. INPO 89-009        | Plant Predictive Maintenance                                       |
| 26. INPO<br>O & MR-308 | Operations and Maintenance Reminder                                |

By its Attorney,



Kurt Janson  
Special Assistant Attorney General  
Department of Public Service  
120 State Street  
Montpelier, Vermont 05602  
(802) 828-2811

Date: May 14, 1990

10367

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION  
before the  
ATOMIC SAFETY AND LICENSING BOARD

DOCKETED  
USNRC

'90 MAY 17 P4:03

In the Matter of )  
VERMONT YANKEE NUCLEAR )  
POWER CORPORATION )  
(Vermont Yankee Nuclear )  
Power Station) )

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH  
Docket No. 50-271-OLA-4  
(Operating License  
Extension)

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 1990, I made service of "State of Vermont Answer in Opposition to Vermont Yankee Nuclear Power Corporation Motion to Compel and State of Vermont Application for Protective Order," and "Notice of Appearance" in accordance with rules of the Commission by mailing a copy thereof postage prepaid to the following:

Administrative Judge  
Robert M. Lazo, Chairman  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Administrative Judge  
Jerry Harbour  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

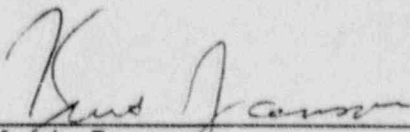
Administrative Judge  
Frederick J. Shon  
Atomic Safety and Licensing Board  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Ann P. Hodgdon, Esq.  
Patricia A. Jehle, Esq.  
Office of the General Counsel  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

R. K. Gad, III, Esq. \*  
Ropes & Gray  
One International Place  
Boston, MA 02110

Anthony Z. Roisman, Esq.  
Cohen, Milstein, Hausfeld &  
Toll  
Suite 600  
1401 New York Avenue, N.W.  
Washington, D.C. 20005

Adjudicatory File  
Atomic Safety and Licensing  
Board Panel  
U.S.N.R.C.  
Washington, DC 20555

  
Kurt Janson  
Special Assistant  
Attorney General

Dated: May 14 1990  
\* Federal Express Overnight Delivery