

UNITED STATES OF AMERICA DOCKETED  
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

LONG ISLAND LIGHTING COMPANY

(Shoreham Nuclear Power Plant,  
Unit 1)

Docket No. 50-322 O.L.

SUFFOLK COUNTY MOTION TO COMPEL ANSWERS TO INTERROGATORIES

Pursuant to 10 C.F.R. 2.740(f), Suffolk County hereby moves for an order compelling complete and responsive answers by LILCO to the following interrogatories:

Suffolk County Contention 1, Interrogatory No. 18;  
Suffolk County Contention 3, Interrogatory No. 29;  
Suffolk County Contention 4, Interrogatory No. 35;  
Suffolk County Contentions 13-15, Interrogatory No. 11;  
Suffolk County Contentions 13-15, Interrogatory No. 12;  
Suffolk County Contentions 13-15, Interrogatory No. 22.

Suffolk County served its interrogatories on March 5 and 6, 1982. They were subsequently modified by agreement of the parties pursuant to the Board's oral request at the March 9-10 Prehearing Conference. LILCO responded on March 26, 1982. Suffolk County contends that the aforementioned responses are incomplete and/or evasive, thus requiring an order to compel answers that are full, complete and responsive. In no instance has LILCO objected to the above interrogatories as they are now stated, nor has it asserted a privilege with regard to them.

The interrogatories at issue, LILCO's responses, and Suffolk County's arguments in support of its motion are set forth as follows:

Contention 1, Interrogatory 18

Identify all indicators at remote equipment locations to be used by operators in the field assisting in remote shutdown, and identify the range displayed by each such indicator.

LILCO's Response: Instrumentation located other than on the RSP is not required for shutdown.

The question did not seek identification of instrumentation required for shutdown, but rather the identity of indicators in remote locations to be used by operators in the field assisting in remote shutdown, as well as the range displayed by such indicators. Thus, LILCO's answer is completely unresponsive. Indicators may include lights or other such items not commonly regarded as "instrumentation." Such indicators might be used by operators in the field assisting in remote shutdown. The information sought is plainly relevant to Contention 1. If no such indicators exist, then the response should so state.

Contention 3, Interrogatory 29

With respect to each response to Interrogatory No. 28, describe how the degree of accuracy was determined and identify all documents concerning such determination.

Response. See 28 above.

Contention 3, Interrogatory 28(a) asked:

With respect to each of the following techniques, state the degree of accuracy to which the technique is able to measure fuel cladding temperature:

- a. Measurement of water level in the reactor vessel.

LILCO responded that:

28a. Measurement of water level in the reactor vessel is discussed in the attached documents regarding SER Open Item #44.

Interrogatory No. 29 requested how the degree of accuracy was determined for each item in Interrogatory No. 28. LILCO's response to Interrogatory No. 29 merely refers back to its responses to Interrogatory No. 28. However, nowhere in its response to Interrogatory 28(a) does it reveal how the degree of accuracy for measurement of water level in the reactor vessel was determined. While it refers to documents regarding SER Open Item #44, they do not describe how the degree of accuracy was determined, nor do they offer a degree of accuracy for water level in the reactor vessel under normal operating conditions. This information was plainly requested by Interrogatory No. 29 and should be provided.

Contention 4, Interrogatory 35

Does LILCO intend to evaluate, or has LILCO in fact evaluated, any problems identified at other General Electric BWR Mark II plants (U.S. or Caorso) to determine their relevance to Shoreham and to determine whether Shoreham's pre-operational testing program for water hammer should be modified? If yes, identify all documents which evidence or concern this matter.

LILCO's Response: GE is responsible for test procedures on ECCS systems and NSSS equipment. These procedures take into account information from previous testing and are basically the same for all plants, varying only to account for plant specific features. Procedures for non-NSSS safety related systems are Shoreham specific and cannot be related to the procedures at other plants.

LILCO's response is clearly evasive. The question asks whether LILCO has evaluated, or intends to evaluate, the problems at issue. LILCO has responded with reference to GE's responsibilities, which shed no light on LILCO's evaluations or intentions to evaluate problems relevant to water hammer at other plants. Furthermore, it has failed to identify any documents evidencing or concerning the matter, as requested.

Contentions 13-15, Interrogatory 11

State how many LILCO QA/QC personnel will be present during each operating shift at Shoreham when the plant is in operation. Explain the basis for LILCO's selection of this number and outline their respective duties.

LILCO's Response: LILCO Operational Quality Assurance will be staffed with an Operating QA Engineer, QA Engineer, QC Engineer and 5 QC Inspectors during the regular work day. As workload requires (i.e., during scheduled, major maintenance overhauls or scheduled refueling outages) OQA personnel will work scheduled overtime as necessary. During any emergency work at the station, OQA personnel will be on-call to provide QA/QC coverage. It is expected that during station refueling outages, OQA may require outside QA/QC contractor assistance. Outside QA/QC contractor personnel will be qualified and certified to the LILCO QA program.

LILCO has failed to completely answer the above question in two ways. First, it has not explained the basis (its reasons) for selecting the number of QA/QC personnel to be present during each operating shift. Second, it has not outlined the duties of the personnel it has identified. Both items of information are relevant to the QA/QC issues present in Contentions 13-15 and therefore should be provided.

Contentions 13-15, Interrogatory 12

12. Describe the QA/QC support to Shoreham operations which is now being provided, or will be provided in the future, by general office personnel employed by LILCO.

Response. The LILCO QA department, located off-site, will be available to provide QA/QC support to the Shoreham operations. The current authorized personnel strength of this department includes 17 professional personnel and 3 technical/clerical personnel.

LILCO's answer is unresponsive and incomplete. It does not include with sufficient particularity the nature of the QA/QC support functions that LILCO's general office personnel are or will be, providing. Nor does it offer an indication of how such support is provided. In this respect LILCO has failed to adequately "describe" the QA/QC support functions of LILCO general office personnel. The information sought is of obvious relevance to Suffolk County's QA/QC contentions and therefore should be provided.

Contentions 13-15, Interrogatory 22

Please identify "those applicable elements of the QA Program in which quality-based related activities are more intensive and impacting upon daily operation" (FSAR Section 17.2) which shall be audited at least annually (i.e., what are the "applicable elements" and what are the "quality-related activities" referred to).

Response. The activities considered to be "more intensive and impacting upon daily operation" are those described in 21(a), (b) and (c) above.

The interrogatory seeks an explanation of LILCO's own FSAR, Section 17.2. Rather than describe the "applicable elements" and "quality-related activities" referred to therein, LILCO guides the



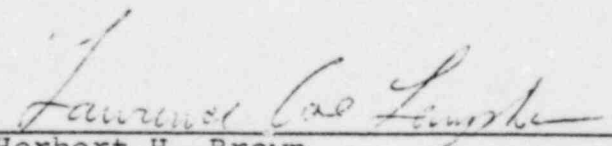
reader to its responses to Interrogatory 21 which it states describe the "activities considered to be 'more intensive and impacting upon daily operation.'" LILCO's answer is evasive in that it does not serve to identify "applicable elements" and "quality-related activities" as the interrogatory unambiguously requests. Nowhere in its response to Interrogatory No. 21 are these elements identified. Therefore, their production should be compelled.

Conclusion

In the preceding instances, LILCO has failed to answer Suffolk County's interrogatories completely and responsively. In light of the deficiencies noted above, the motion to compel more complete and responsive answers to those interrogatories should be granted.

Respectfully submitted,

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April 1, 1982

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
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LONG ISLAND LIGHTING COMPANY )  
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(Shoreham Nuclear Power Station, )  
Unit 1) )  
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CERTIFICATE OF SERVICE

I hereby certify that copies of the "SUFFOLK COUNTY MOTION FOR ORDER COMPELLING LILCO TO PRODUCE DOCUMENTS," and the "SUFFOLK COUNTY MOTION TO COMPEL ANSWERS TO INTERROGATORIES," dated April 1, 1982, have been served to the following by U.S. Mail, first class, except as otherwise noted:

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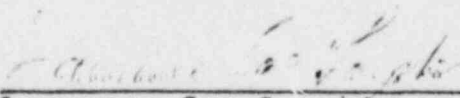
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April 1, 1982

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