

June 21, 1982

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)	
)	
WISCONSIN ELECTRIC POWER COMPANY)	Docket Nos. 50-266
)	50-301
)	(OL Amendment)
Point Beach Nuclear Plant,)	
(Units 1 and 2))	

LICENSEE'S RESPONSE TO DECADE'S
SECOND INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS ON LICENSEE
RELATIVE TO FULL SCALE SLEEVING PROGRAM

Licensee herein responds to "Decade's Second Interrogatories and Request for Production of Documents on Licensee Relative to Full Scale Sleeving Program."

Licensee objects to the interrogatories and request for production of documents in their entirety on the grounds of untimeliness. Licensee also objects to various interrogatories on other grounds. Nevertheless, for reasons explained below, Licensee is hereby voluntarily providing answers to most of the interrogatories. The voluntary answers are contained in the Attachment to this Response. The answers are not being provided as a requirement under the Commission's rules or order of the Board, and should in no way be construed as a waiver of

Licensee's rights to object to the answering of those interrogatories.

The discovery schedule was established by order of the Board during a telephone conference call with the parties on January 11, 1982, Tr. 889-92. That schedule provided for the filing of follow-up interrogatories based on the answers to the first-round interrogatories:

There is a possibility that follow-up interrogatories might be required by the nature of the answers to the initial interrogatories. Such follow-up interrogatories, if required by answers in the initial interrogatories, will be filed no later than 10 days after receipt of the answers.

Tr. 890. The interrogatories at issue here are the follow-up interrogatories to Licensee's responses to Decade's first round interrogatories dated February 10, 1982.

Licensee responded to the first round interrogatories on March 1, 1982. In addition, on April 30, 1982, Licensee filed supplemental responses to certain interrogatories, and responded to certain others as compelled by Board Order of April 22, 1982.

Decade's follow-up interrogatories are dated May 29, 1982. What is particularly egregious is that Decade's Peter Anderson certified that he had served the interrogatories on Licensee on May 29, 1982, when in fact Licensee received them by first class mail postmarked June 1, 1982 p.m.

Licensee's April 30, 1982 responses stated that copies of the requested documents were available for inspection at

Licensee's offices. Not until May 14 did Decade inspect the documents, at which time it was given copies of all documents requested.

In propounding the follow-up interrogatories, Decade has not identified the initial responses which prompted the follow-up interrogatories, thus adding significantly to Licensee's efforts to respond to them. Licensee has attempted to make such identification (sometimes without success) and explains below the untimeliness of, and other objections to, each of Decade's follow-up interrogatories.

Interrogatory 1. This is a follow-up to initial Interrogatory 16 relating to leaking plugs. Interrogatory 16 was answered on April 30, 1982, and the document referenced was received by Decade on May 14, 1982, more than ten days prior to June 1, 1982, the date the interrogatories were postmarked, and more than ten days prior to the alleged May 29 date. No aspect of this interrogatory bears any relationship to the proposed sleeving program.

Interrogatory 2. This interrogatory was prompted by a document referenced in Licensee's April 30, 1982 supplemental response to initial Interrogatory 7 relating to results of tests performed. The documents cited were reviewed by Decade on May 14, 1982, more than ten days prior to June 1, 1982 (and May 29, 1982).

Licensee further objects on the grounds that the interrogatory bears no relationship to initial Interrogatory 7, to

which it apparently is a follow-up, or to the proposed sleeving program.

Interrogatory 3. Licensee is unable to identify an initial interrogatory to which this interrogatory is a follow-up, and objects to answering it on that basis. In any event, it is untimely since no answers were given Decade later than April 30, 1982, and no documents were given Decade later than May 14, 1982. Licensee further objects on the grounds that it is unrelated to Licensee's proposed sleeving program.

Interrogatory 4. Licensee is unable to identify an initial interrogatory to which this interrogatory is a follow-up. Licensee objects for the same reasons given in the discussion of Interrogatory 3 above.

Interrogatory 5. Licensee is unable to identify an initial interrogatory to which this interrogatory is a follow-up. Licensee objects for the same reasons given in the discussion of Interrogatory 3 above.

Interrogatory 6. Licensee is unable to identify an initial interrogatory to which this interrogatory is a follow-up. Licensee objects for the same reasons given in the discussion of Interrogatory 3 above.

Interrogatory 7. This appears to be a follow-up to initial Interrogatories 15 and 16 relating to leaking plugs. Interrogatories 15 and 16 were answered on April 30, 1982, and the documents referenced were provided on May 14, 1982, more than ten days prior to June 1, 1982 (and May 29, 1982). The interrogatory bears no relationship to the sleeving project.

Interrogatory 8. This interrogatory is a follow-up to initial Interrogatory 15, which was answered by Licensee on April 30, 1982, a month prior to the time prior to June 1, 1982 (and May 29, 1982). It also bears no relationship to the proposed sleeving program at Point Beach.

Interrogatory 9. This interrogatory appears to be a follow-up to initial Interrogatory 16 relating to leaking plugs. The initial interrogatory was answered on April 30, and the document referenced was provided Decade on May 14, 1982, more than ten days prior to June 1, 1982 (and May 29, 1982).

Interrogatory 10. This interrogatory was prompted by a document referenced in Licensee's April 30, supplemental response to initial Interrogatory 17. The document was received by Decade on May 14, 1982, more than ten days prior to June 1, 1982 (and May 29, 1982). Also, to the extent the interrogatory bears on explosive plug removal, it is not relevant to the proposed sleeving program at Point Beach.

Interrogatory 11. This interrogatory appears to be a follow-up to initial Interrogatory 16 relating to leaking plugs. Interrogatory 16 was answered on April 30, 1982, and the document referenced was received by Decade on May 14, 1982, more than ten days prior to June 1, 1982 (and May 29, 1982). Also, the interrogatory is not relevant to the Point Beach sleeving effort.

Interrogatory 12. Licensee is unable to identify an initial interrogatory to which this interrogatory is a

follow-up, and objects to answering it on that basis. In any event, it is untimely, since no answers were given Decade later than April 30, 1982, and no documents were given Decade later than May 14, 1981. License further objects on the grounds that it is unrelated to Licensee's proposed sleeving program. In addition, Licensee objects to the interrogatory on the ground that it would require the independent and burdensome performance of specific analyses to generate information Licensee does not now possess.

Interrogatory 13. This interrogatory appears to be a follow-up to Decade's initial Interrogatory 16 which was answered on April 30, 1982. The documents referenced were provided on May 14, 1982, which was more than ten days prior to June 1, 1982 (and May 29, 1982). Also, the interrogatory bears no relationship to the proposed sleeving program at Point Beach.

Interrogatory 14. This interrogatory appears to be a follow-up to Decade's initial Interrogatory 16 which was answered on April 30, 1982. The documents referenced were provided on May 14, 1982, which was more than ten days prior to June 1, 1982 (and May 29, 1982). Also, the interrogatory bears no relationship to the proposed sleeving program at Point Beach.

Interrogatory 15. The document referenced in this interrogatory was provided to Decade on May 14, 1982 in response to initial Interrogatory 13, more than ten days prior to June 1, 1982 (and May 29, 1982).

Interrogatory 16. The document referenced in this interrogatory was provided to Decade on May 14, 1982 in response to initial Interrogatory 17, more than ten days prior to June 1, 1982 (and May 29, 1982).

Interrogatory 17. This interrogatory is apparently a follow-up to initial Interrogatory 16 related to leaking plugs. Interrogatory 16 was answered on April 30, 1982, and the document referenced was received by Decade on May 14, 1982, more than ten days prior to June 1, 1982 (and May 29, 1982). Licensee further objects on the grounds that the interrogatory, as framed, is not limited to the subject matter of the proceeding (sleeving) is far too broad and general. Further, Licensee objects to Decade's characterization of the letter as stating an instance of "deficient or inadequate work;" as such, the letter does not provide the basis for filing Interrogatory 17 as a follow-up interrogatory "required by the nature of the answers to the initial interrogatories." Tr. 889.

Interrogatory 18. This interrogatory is apparently a follow-up to Decade's initial Interrogatory 16 which was answered on April 30, 1982. The referenced document was received by Decade on May 14, 1982, more than ten days prior to June 1, 1982 (and May 29, 1982).

Licensee is particularly concerned by the lateness of the interrogatories, as well as by the general inapplicability of the interrogatories, in view of the fact that Decade, which has been given extraordinary latitude in pursuing its discovery in

this proceeding, is well aware of the unique vulnerability of the hearing schedule to discovery disputes. Ironically, it is that very vulnerability which, in this instance, has prompted Licensee to voluntarily provide answers herewith in spite of the above-stated objections. As discussed above, the answers are being provided solely for the purpose of pursuing the very tight schedule we are now experiencing, and are not to be construed as an acknowledgment of any obligation on Licensee's part to answer the interrogatories or a waiver of Licensee's rights to object to answering the interrogatories.

Accordingly, there is attached Licensee's voluntary answers to Decade's second round interrogatories 1 through 11 and 13 through 18.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

By: *Delissa A. Ridgway*
Bruce W. Churchill
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Counsel for Licensee

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Dated: June 21, 1982

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NUCLEAR REGULATORY COMMISSION

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In the Matter of)
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(Point Beach Nuclear Plant,)
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Attachment

LICENSEE'S VOLUNTARY ANSWERS TO
DECADE'S SECOND ROUND INTERROGATORIES /
DATED MAY 29, 1982

1. Describe the Westinghouse laboratory autoclave test results of exploded plugs referenced in the memorandum from G. A. Reed (WE) to Sol Burstein (WE), dated July 18, 1977.

RESPONSE

The tests referred to in the memorandum were possible future tests of explosive plugs in laboratory autoclaves to determine the sensitivity of the plugs to cracking in a high temperature oxygenated environment. To the best of our knowledge, no such tests were performed.

2. State whether any "pitting" or copper-like signal distortions from eddy current testing have ever been observed at Point Beach Nuclear Plant, such as are referenced in the EPRI Memorandum to the Steam Generator Owners Group, dated March 4, 1982, and in the Report of EPRI Review of Intergranular Attack, February 1-2, 1982, at Attachment 2 to

Attachment 1. Include the location of the pitting or copper-like signal distortions by "A" or "B" steam generator, the row and column number, the hot or cold leg and the vertical height, as well as the extent of through wall degradation.

RESPONSE

Detailed eddy current results and metallurgical evaluations of tubes removed from Units 1 and 2 at Point Beach were provided in Licensee's Response to Decade's First Interrogatories and Request for Production of Documents on the Full Scale Sleeving Program ("Interrogatories") dated March 1, 1982, in Interrogatories 13 and 14. Neither the eddy current examinations nor the metallurgical evaluations of removed tubes show any indication of pitting of steam generator tubes.

Copper-like signals have been detected occasionally near the tubesheet in the steam generators of both units in the past. Eddy current results showing the location of these signals are provided in Document Nos. 3, 15 and 16 of Licensee's response to Interrogatory 14.

3. State any test or inspection results that indicate the copper oxide content in the sludge at Point Beach Nuclear Plant.

RESPONSE

The copper content from past sludge analyses from Point Beach steam generators is as follows:

<u>Unit 1</u>	<u>Date</u>	<u>Weight Percent, as CuO</u>
Steam Generator B	10/72	62.0
Steam Generator A	2/75	1.16
Steam Generator B	2/75	1.12
Steam Generator A	10/76	48.5
Steam Generator B	10/76	48.5

<u>Unit 2</u>	<u>Date</u>	<u>Weight Percent, as CuO</u>
Steam Generator A	10/74	26.1
Steam Generator B	10/74	71.7
Steam Generator A	3/76	67.0
Steam Generator B	3/76	67.8

4. State whether Point Beach Nuclear Plant has been constructed or modified with copper alloys in its heat transfer surfaces in the secondary cycle. Include the location and extent copper alloys were used.

RESPONSE

The secondary systems of both Units 1 and 2 contain alloys of copper in heat exchange equipment. The location and extent of copper alloy use are as follows:

<u>LOCATION</u>	<u>ALLOY</u>	<u>USE</u>
Main Condensers	Admiralty	Tubing
Nos. 1, 2 and 3 Feedwater Heaters	Admiralty	Tubing
No. 4 Feedwater Heaters	90-10 Cu-Ni	Tubing
No. 5 Feedwater Heaters	80-20 Cu-Ni	Tubing
Moisture Separator Reheaters	90-10 Cu-Ni	Tubing
Gland Steam Condensers	90-10 Cu-Ni	Tubing
Condensate Coolers	Admiralty	Tubing
Hydrogen Coolers	Admiralty	Tubing
Air Ejector Condensers	Admiralty	Tubing

5. State whether Point Beach Nuclear Plant has experienced condenser in-leakage. Include the date, duration and amount of condenser in-leakage.

RESPONSE

Both Units 1 and 2 at Point Beach Nuclear Plant have experienced condenser inleakage in the past and will continue to experience occasional inleakage. This condenser inleakage experience is summarized in Exhibit 13 in Public Service

Commission of Wisconsin Docket 6630-UI-2, a copy of which is being provided to you under separate cover.

6. State any information relating to a 10% derating at San Onofre Unit 1 following sleeving which is referenced in the EPRI Memorandum, supra. Include any information relating to whether any derating following sleeving may [be] necessary at Point Beach Nuclear Plant.

RESPONSE

It is our understanding that the 10 percent derating, referenced in the attachment to the EPRI memorandum, is the result of a reduction in reactor coolant system temperature to reduce the rate of steam generator tube corrosion. The reduced temperature operation is not a requirement of the U. S. Nuclear Regulatory Commission and is not related to sleeving.

In any event, it is expected that sleeving of steam generators would allow full power operation of either unit at Point Beach.

7. Describe in detail the "rocketing" phenomenon referenced in the letter from G. A. Reed (WE) to J. S. Taylor (W), dated June 17, 1975, No. PBP-WMP-791, and in the memorandum to file from G. A. Reed, dated March 25, 1974, re Meeting on Repair of "B" Steam Generator Leaking Tube Plug.

RESPONSE

Explosive plugs are installed by detonation of an explosive charge inside the hollow plug to expand the plug and tube walls against the tubesheet to form a seal. Since the plugs are open at the lower end, the plug would be propelled upward into the tube by the force of the explosion if the plug

were not restrained. To restrain the plug during detonation, the outside diameter of the plug at the lower end is larger than the tube inside diameter. This provides an interference fit which allows the plug to expand rather than be propelled ("rocketed") up into the tube.

The "rocketed" plugs described in the referenced documents are believed to be due to slightly undersized plug ends which allowed the plug to move upward a short distance before the plug wall expanded to form a seal.

8. State which tubes with leaking plugs referenced in Licensee's answer to Interrogatory #15 were previously explosively plugged, which were mechanically plugged, and which were plugged by any other means.

RESPONSE

All tubes with plugs which exhibited indications of potential leakage in the answer to Interrogatory No. 15 were explosively plugged, except for the following tubes:

Unit 1 Steam Generator A

R04C59	Mechanical Plug
R08C50	Mechanical Plug

Unit 1 Steam Generator B

R29C41	Welded Plug
R04C46	Mechanical Plug

9. State the reason the author of the handwritten note on the routing slip attached to the letter from R. L. Kelly (W) to G. A. Reed (WE), dated September 29, 1978, No. WEP-78-540, indicates that tube sheet crevice cracking will require mechanical plugs in order to sleeve tubes in the future.

RESPONSE

The handwritten comments reflect the author's belief that mechanical plugs would be more easily removed from plugged tubes than would explosively bonded plugs. Therefore, in the event sleeving of large numbers of plugged tubes were to be done in the future, the time required for plug removal and tube preparation would be minimized.

10. State the eddy current test results or any other test results of the tubes with mechanical or explosive plugs removed during the Point Beach Sleeving Demonstration Program as referenced in the Westinghouse Field Service Report of the October 15 to November 23, 1981 site visit. Also state whether any steam generator tubes, previously plugged by explosive or mechanical means, have at any other time subsequently been tested or inspected to determine whether the tube wall integrity has changed following the insertion of the plug. Include the results of the test or inspection following plugging in comparison to the latest test or inspection results prior to plugging.

RESPONSE

Eddy current test base line data for those tubes with mechanical or explosive plugs removed during the Point Beach Sleeving Demonstration is documented in the following reports:

- (1) Westinghouse Field Service Report, WEP-24 Appendix IIIA (Westinghouse Proprietary) (Referenced in supplemental response to WED first set of interrogatories, Interrogatory 17, Item No. 2).
- (2) Letter, C. W. Fay to H. R. Denton, January 25, 1982, "Sleeving Demonstration Program Point Beach Nuclear Plant, Unit 1" (Referenced in supplemental response to WED first set of interrogatories, Interrogatory 17, Item No. 1).

Unit 2, Tube R18C37 was identified as a leaker prior to plugging on March 10, 1980. A section of Tube R18C37 was subsequently removed for testing in April 1980. The pertinent results are documented in the following reports:

- (1) Letter, C. W. Fay to H. R. Denton, May 9, 1980, "Preliminary Results Inspection of Tube R18C37 Point Beach Nuclear Plant, Unit 2" (Referenced in response to WED first set of interrogatories, Interrogatory 16, Item No. 21).
- (2) Licensee Event Report, No. 80-002/01T-1 (Referenced in response to WED first set of interrogatories, Interrogatory 16, Item No. 132).

11. State the definition of the word "actuated" as used in the memorandum from C. W. Fay (WE) to G. A. Reed (WE), dated March 24, 1975, re PBNP - Unit 1 - Steam Generator Tube Plugging, and state any implications from movement of a plug when actuated that were considered by the author of the memorandum or participants in the meeting described in the memorandum.

RESPONSE

The word "actuated" in the referenced document refers to the detonation of the explosive charge in the plug to expand the plug and form a seal.

The implications of plug movement during detonation which were considered are clearly described in the referenced document. The participants considered the possibility that plug movement resulted in an unacceptable seal, the potential for further plug movement during operation, the potential for creating a situation more severe than had been analyzed for the

steam generator tube rupture accident, and the potential for plug movement increasing the likelihood of an accident. In all cases, the participants concluded in the negative.

13. State whether any material has been found in the primary or secondary side of the steam generators at Point Beach Nuclear Plant following inspections, repairs or modifications of the steam generators that was inadvertently left behind, such as but not limited to the plug remnant referenced in the letter from G. A. Reed (WE) to D. C. Spencer (W), dated November 1, 1977, or the small rings referenced in the memorandum from G. A. (Reed) (WE) to R. A. Newton (?), dated February 28, 1977, re Westinghouse Letter of February 18, 1977, or the two pieces referenced in the letter from G. A. Reed (WE) to T. E. Bowman (W), dated October 20, 1976, re Leaking Tube Plugs. Include the date, location, description and the source of the material.

RESPONSE

The referenced documents all refer to the same two small foreign objects which were found in the Unit 1 steam generator A primary coolant inlet plenum during the October 1976 refueling outage. These small pieces were believed to be portions of an explosive plug which may have experienced cracking. The small pieces were removed from the steam generator for possible future examination. There was no indication of any damage to the steam generator as a result of the foreign objects. There have been no further instances of foreign objects found in the primary side of steam generators of either unit at Point Beach.

During the fall 1981 Unit 1 refueling outage, a small ultrasonic transducer used for experimental secondary side sludge height determinations became dislodged from the

inspection tooling during sludge height measurements in steam generator A. Repeated attempts to locate the transducer were unsuccessful. The transducer was estimated to weigh in the order of only 10 to 15 grams and was constructed primarily of plastic and aluminum. Since these materials decompose at steam generator operating temperatures, and in view of the insignificant mass, further attempts to recover the transducer were not made. It is expected that the transducer decomposed during startup, with any decomposition products being removed with steam generator blowdown. There were no indications of any damage to steam generator tubes due to this object during a spring 1982 steam generator inspection.

A secondary side inspection of the Unit 2 steam generators during the spring 1982 refueling outage revealed a small piece of weld rod lodged between peripheral tubes in steam generator A. The weld rod was recovered and measured approximately 14 inches long by one-eighth inch in diameter. The source of the weld rod is unknown; however, it is believed to have been present for several years based upon visual examination of the extracted weld rod. No indications of damage due to the weld rod were found during this inspection. A memorandum on this subject, "Unit 2 Refueling & Steam Generator Annular Search," from J. G. Schweitzer to C. W. Fay, dated June 15, 1982, is being provided under separate cover. The color photographs described in the memorandum are available for inspection at the office of David K. Porter, Wisconsin Electric Power Company.

14. State whether any material originating in the steam generators at Point Beach Nuclear Plant has been observed outside the steam generators in the primary coolant piping or pumps, pressurizer or reactor vessel, such as the large object thought to be a dislodged plug found in the reactor vessel and referenced in the memorandum from G. A. Reed (WE) to R. A. Newton (?), dated February 28, 1977, re Westinghouse Letter of February 18, 1977.

RESPONSE

The object described in the referenced document was believed to be an explosive plug and was found during inspection of the Unit 1 reactor vessel during the fall 1976 refueling outage. It has not been established that the object was a "dislodged plug." The object was removed from the reactor vessel. No indications of damage to the reactor vessel were observed.

There have been no other foreign objects originating in the steam generators which have been observed in the primary coolant piping, pumps, pressurizer or reactor vessel during subject inspections.

15. State the reason the author of the handwritten note on the routing slip to the memorandum from M. G. Keehan (WE) to G. A. Reed (WE), dated March 12, 1982, re Unit 1 Steam Generator Tube Plugging History, indicates that the Licensee's plant employees characterize the reason for plugging differently than the corporate headquarter's employees.

RESPONSE

There are minor differences between tube plugging summary tables kept by Point Beach Nuclear Plant personnel and Nuclear Engineering Section personnel. The handwritten comment

referred to the total number of tubes indicated as being plugged in the Point Beach summary table, which did not account for six plugged tubes which were unplugged during the demonstration program.

16. State the extent to which thermally treated Inconel 600 is more or less corrosion resistant than mill annealed Inconel 600 with respect to reduced sulfur species in the secondary water as referenced in the Report of EPRI Review of Intergranular Attack, dated February 1-2, 1982, at p. 2 of the Highlights.

RESPONSE

Licensee does not currently possess information in response to this interrogatory other than that contained in the referenced EPRI document.

17. State any instances of deficient or inadequate work performed by Westinghouse or under the direction of Westinghouse at Point Beach Nuclear Plant, such as the instance referenced in the memorandum from G. A. Reed (WE) to R. A. Newton (?), dated February 28, 1977, re Westinghouse Letter of February 18, 1977.

RESPONSE

Licensee knows of no instances of deficient or inadequate work performed by Westinghouse at Point Beach Nuclear Plant related to the sleeving of steam generator tubes.

18. State any instances of difficulties encountered in removing or attempting to remove a mechanical plug at Point Beach Nuclear Plant, or, if known, at any other pressurized water reactor, such as referenced in the memorandum from C. J. Olson (WE) to File, dated May 7, 1980, re Unit 2 Refueling.

RESPONSE

As described in the referenced document, a mechanical plug installed in Unit 2 steam generator A hot leg in March 1980 was broken during attempts to remove the plug during the April 1980 refueling outage. The remaining portion of the plug was successfully removed. This is the only instance of significant difficulty in removing mechanical plugs at Point Beach.

The cause of the broken plug is believed to be the relatively high installation forces used to install mechanical plugs of the initial design. Subsequent design and procedure modifications have resulted in lower installation forces which, in turn, allow mechanical plugs to be removed more easily.

Licensee has been informed that difficulties have been experienced with mechanical plug removal at Ringhals Unit 2, in Sweden, operated by the Swedish State Power Board. Licensee has no information regarding the nature of these difficulties.

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Units 1 and 2) (OL Amendment)

AFFIDAVIT OF DAVID K. PORTER

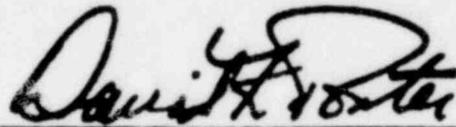
County of Milwaukee)
: SS
State of Wisconsin)

DAVID K. PORTER, being duly sworn according to law, deposes and says:

1. I am Manager of the Nuclear Engineering Section of the Nuclear Power Department of Wisconsin Electric Power Company. I graduated from the University of Illinois with a bachelor of science degree in electrical engineering in 1965. I then spent four years in the U. S. Navy's Nuclear Power Program which included one year in training and three years of reactor operator experience as an engineering officer aboard a nuclear-powered cruiser. I joined the Nuclear Projects Office of Wisconsin Electric in 1969 and have been involved in various engineering assignments relating to the Point Beach Nuclear Plant and preconstruction nuclear projects since that time. As Manager of the Nuclear Engineering Section, I am responsible for providing

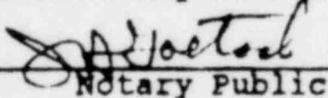
technical, licensing, and engineering support to the Point Beach Nuclear Plant. These responsibilities include the technical review of plant equipment and repair specifications and implementation of U. S. Nuclear Regulatory Commission ("NRC") licensing actions involving Wisconsin Electric's operating nuclear facilities. I am personally familiar with repair of the Point Beach Nuclear Plant steam generators and our application before the NRC with respect to these activities.

2. I have prepared or participated in the preparation of "Licensee's Response to Decade's Second Interrogatories and Request for Production of Documents on Licensee Relative to the Full-Scale Sleeving Program", dated June 21, 1982; the information contained in those responses is true and correct to the best of my knowledge and belief.



David K. Porter

Subscribed and sworn to before me
this 21st day of June, 1982.


Notary Public

My Commission Expires July 4, 1982

June 21, 1982

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Units 1 and 2))

CERTIFICATE OF SERVICE

This is to certify that copies of "Licensee's Response to Decade's Second Interrogatories and Request for Production of Documents on Licensee Relative to Full Scale Sleeving Program" are being served to all those on the attached Service List by deposit in the U.S. Mail, first class, postage prepaid, this 21st day of June, 1982.


Melissa A. Ridgway

Dated: June 21, 1982

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