

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

RELATED CORRESPONDENCE

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the matter of )  
)

PORTLAND GENERAL ELECTRIC COMPANY, )  
et al. )

(Trojan Nuclear Plant) )

Docket No. 50-344

(Control Building  
Proceeding)

COLUMBIA ENVIRONMENTAL COUNCIL  
INTERROGATORIES TO LICENSEE

Interrogatory 1

How many design errors were made? Were these entirely independent, or were some errors caused by earlier errors? Please provide details.

Interrogatory 2

What methods of supervision were employed by those who had the duty to supervise the man who made the errors?

Interrogatory 3

What was the formal role and what was the actual role of the AEC Staff in supervising the original design of the Control Room?

Interrogatory 4

Did the supervisors of the man who made the original errors independently derive any of the information erroneously relied upon?

Interrogatory 5

Why is it that such composite snear wall designs are not used on other nuclear plants constructed by Bechtel?

Interrogatory 6

What was the precise reason that it was thought necessary in the Spring of 1978 to cut a hole in the Control Room Wall? Is the hole going to be cut? Are other holes in the Control Room or other buildings contemplated? Please provide details.

Interrogatory 7

In exactly what manner was the error discovered? Is it a fact that a Bechtel employee simply looked at the blueprints for the Control Room and "Thought they looked a little light"? Who had reviewed those blueprints before that moment, and why didn't they notice the same problem?

Interrogatory 8

Describe in detail the planned and the actual on-site super-

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CEC Interrogatories to Licensee continued.

vision of the construction of the Control Room by employees of PGE, and by employees of Bechtel.

Interrogatory 9

Please state your response to the major paragraph on page two (2) of the letter to Dr. Fred Miller from Harold I. Laursen, Ph.D., P.E. of May 18, 1978. (See Control Building Docket Correspondence, No.5)

Interrogatory 10

The NRC Staff concluded on May 26, 1978 that there was "reasonable assurance" that the facility would "withstand the SSE," but that "the intended and desired margins of safety are not present." (See Control Room Docket Correspondence, No.10.) The Staff (per Trammell) also estimated that the Control Building had approximately 50% of the seismic capacity originally intended and approved. In the light of the STARDYNE analyses, what would you now estimate the short-fall to be?

Interrogatory 11

Licensee is requested to provide a copy of the recent order of the Public Utility Commissioner denying a 33 1/3% emergency rate increase request.

Interrogatory 12

The minutes of the Directors meeting of PGE of Sept. 6, 1978 contain the following entry: "Nevertheless, there is general agreement among NRC Staff, Bechtel, the Company's consultant and the Company that no safety problems would arise due to interim operation." Please provide all information upon which the conclusion was made that the NRC Staff had decided by Sept. 6, 1978, that no safety problems would arise due to interim operation.

Interrogatory 13

With regard to the minutes of the Directors meeting of Sept. 6, 1978, it is noted that after the finite element analysis had been performed, that Doctors Holley and Bresler still felt that there were "substantial questions which needed more work." What were those questions, and what answers were arrived at?

Interrogatory 14

Has Licensee shown the Public Utility Commissioner for Oregon the construction and design contracts with Bechtel regarding the Trojan Nuclear Plant?

Interrogatory 15

In what regard if any does the structure and composition of the ceiling of the Control Room differ from that of the walls?

Interrogatory 16

Has the state of the art developed to the point where the effect of an earthquake on the Trojan facility could be tested by the use of scale models?

CEC Interrogatories to Licensee continued.

Interrogatory 17

If the SSE represents the maximum potential earthquake for the site and OBE represents the maximum earthquake which can be expected to occur at the site during the life of the plant, on what basis is the distinction between these two made? (See letter from A. Schwencer to Dr. Miller, Control Building Docket Correspondence, No. 12)

Interrogatory 18

Please supply the study or other materials on which it was concluded that the concerns expressed in a June 23, 1970 review of the seismic design criteria for the Trojan Nuclear Plant by John A. Bloom and Associates could be disregarded.

Interrogatory 19

Please provide details on all communications in any form which the Licensee has had with the office of the Public Utility Commissioner of Oregon, with the news media, or the NRC Staff, with regard to the possibility of recovering consequential damages from Bechtel Corporation.

Interrogatory 20

If possible, please compute the horizontal ground displacement of an earthquake at .25g.

Interrogatory 21

Why have there been no OBE and SSE test shutdowns? In the absence of such tests, how has it been determined that all relevant employees would respond properly in such an event?

Interrogatory 22

Provide a history of reportable occurrences which have involved design errors.