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OFFICE OF SECRETARY  
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BRANCH

U. S. Nuclear Regulatory Commission

In the Matter of  
CPC Midland Plant  
Units 1 & 2

Docket Nos.  
329-OL  
330-OL

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD  
STAMIRIS INTERROGATORIES AND DOCUMENT REQUESTS  
TO CONSUMERS POWER COMPANY

8/30/82

(Documents are meant to include studies, models, notes reports, working papers, or other written records of communication of CPC/Bechtel or other plant employees, or outside consultants, experts, agencies, or companies contacted on the subject. Provide names and address of authors or sources for documents provided.)

COST/BENEFIT: CONTENTION 1b and 1c

1. Explain in detail the "prompt removal/dismantlement decommissioning plan for Midland. Describe any special procedures or equipment which will be used to protect the workers and the environment from radiation. Include estimates of length of time to complete the job and the condition of the plant site upon completion.
2. Provide documents which form the basis for the decommissioning plan described in 1 above.
3. To what extent if any will Midland's decommissioning be affected by soils remedial measures such as underpinning supports, dewatering equipment, or others?
4. Explain in detail how the \$235 million (1984 dollars) decommissioning estimate was derived for Midland. Include breakdown of costs for the component steps described.

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5. What does CPC calculate Midland decommissioning costs to be as a % of its projected lifetime production cost savings? Explain this calculation.
6. To what extent is the Midland decommissioning financing, and collection plan based upon the Big Rock and Palisades models? Explain any differences if they exist.
7. Explain in detail the method CPC proposes to finance and collect Midland decommissioning costs until the year 2000. Include explanations of inflation allowances, interim use of money collected by CPC, liquidity of these assets, and method of guaranteeing availability of money when needed for decommissioning.
8. Provide documents which form the basis for the financing and collection plan described in q. 7.
9. If Big Rock and Palisades' combined \$111 million decommissioning cost in 1980 dollars (MP 6/81-50M, 62-51912 CPC decommissioning pamphlet) results in the collection of \$526 million (exhibit A/S-1, MPSC case 6150) by the year 2000, what amount is estimated to be collected for Midland by the year 2000 according to your plan? Explain these calculations.
10. Does the \$235 million estimate represent the full amount to be collected according to your decommissioning plan described in the last part of your pamphlet cited above, if not, explain why it shouldn't.
11. a) According to current laws, explain the federal income tax rate and manner by which CPC will be taxed for decommissioning money collected early. b) What are these tax amounts projected to total through the year 2000 on the decommissioning amounts projected in q. 9? c) Will money be collected from ratepayers above and beyond amounts estimated in q. 9 to support these CPC tax expenditures? If so explain and estimate these added ratepayer contributions.
12. What was the projected life expectancy for Midland units 1 & 2 respectively.

13. Explain in detail how the 66% lifetime capacity factor is derived for Midland. Does this estimate take into account any expected differences between Unit 1 & Unit 2 operating capacity, pressure, or temperature limitations due to the defective beltline weld in Unit I? Explain these differences if they exist.
14. Explain in detail the apparant discrepancy in the EFPY estimates for Unit I operation appearing on pages 5-19 and C-13 of the SER?
15. What is the EFPY estimate you are currently using for Unit I? Explain any differences between this estimate and those submitted for the SER.
16. Explain in detail the apparant discrepancies between flux properties on SER p. 5-19 and FSAR section 5.3.1.6.1.3 for surveillance samples and actual beltline material samples. Provide the calculations and other documents which form the basis of this explanation.
17. Provide documents relating to reduced operating capacity or life expectancy of Unit I.
18. Explain any contingency economic plans for shorter life expectancy of Unit I in terms of electrical production and related costs to ratepayers, and in terms of inability to produce steam for Dow according to contractual obligations. what will happen if Unit I must shut down after 10 years?
19. Has CPC considered performing preventative rather than remedial thermal annealing or other corrective measures for defective reactor welds prior to plant operation to avoid the safety and economic costs associated with post operative radiation? If yes, explain. If not why not.
20. Explain in detail the method of performance and frequency of inspections planned by the B & W Owners Group Surveillance program for monitoring reactor weld

fracture toughness and other weld conditions? How does this program protect against the possibility of sudden failure?

21. Provide documentation for B & W program above.
22. Explain in detail when and how CPC first became aware of the defective weld material--or the questionable quality of weld material in their reactors.
23. Provide all documents and correspondence sent and received regarding the reactor vessel weld properties prior to the installation of the reactors at Midland.
24. When were the Unit I and Unit II reactors installed (give month and year)?
25. Were Unit I and Unit II reactors ever switched from their originally planned containments? If yes, explain why.
26. Did any confusion                    tification of Unit I and Unit II reactors ever occur. If so explain when and how this occurred, what occurred and how it was resolved.

QUALITY ASSURANCE: SINCLAIR CONTENTION 6

1. If a plant worker has a safety concern, what is the chain of reporting open to him? Describe the workings of this internal reporting system.
2. In reporting a safety concern to the NRC would a plant employee be free to provide the NRC with back up site work documentation without the permission of Bechtel or CPC superiors?
3. If the answer to q. 2 is no, how does this affect the necessary free flow of information to the NRC?
4. Does CPC, Bechtel or any subcontractor encourage workers with safety related complaints to keep the problems "in house" as opposed to going to the NRC? Explain.

5. If a plant worker has pursued the internal QA reporting system, and gone to the NRC, but still feels his safety concerns have not been properly addressed, is he free to go to the public with those concerns as an employee of CPC, or Bechtel--as an ex-employee of CPC or Bechtel? If not, explain why.
6. What records are kept of worker safety related complaints, reports of violations of QA procedures allegations, or use of internal reporting system described in q. 1 above? (I am interested in the incidence of reporting, not the reports themselves.)
7. Provide a list of former plant employee names and forwarding addresses who left in 1981 or 1982 and had reported a complaint about improper QA/QC procedures, made use of the internal reporting system described in q. 1, or filed an allegation.
8. How long has the MPQAD internal allegation form been in existence? Is this form made available to all plant workers--how? Please provide a copy.

#### EFFECTS OF DEWATERING: CONTENTION 3

1. Explain in detail the prolonged (40 year) effect of permanent dewatering upon the various subsoil layers and underlying groundwater.  
In answering this question:
  - a. Include explanations of the potential 40 year effects of removal of fines from soil layers, and how this is monitored.
  - b. Discuss the interrelated effects of one soil layer upon another.
  - c. Explain the potential 40 year effects of groundwater movement from lower to upper levels during dewatering.
  - d. Discuss the possible weakening of the "essentially impervious" intermediate clay layer separating the perched ground water from the underlying confined aquifers, under artesian pressure. In so doing consider all possible combined effects of a 40 year dewatering system.

- e. Discuss the possible after-effects of 40 year dewatering on groundwater movement between upper and lower levels and upon interrelated soil layers, possibly weakened or changed by dewatering.
2. What studies or other data exist concerning prolonged (40 year) effects of dewatering upon subsoils and groundwater relationships?
3. Provide documents upon which answers to q. 1 are based.
4. Did the assurances provided to the NRC for the PEG analysis regarding the effects of possible radioactive release to groundwater following a core-melt accident take into account the effects of prolonged dewatering on subsoil and groundwater conditions? If yes, explain. If not, why not.

#### INDEPENDENT DESIGN AUDIT: CONTENTION 4

1. How much time, money, and effort is involved in the Bechtel Audit of Bechtel construction and design announced at the 5/20/82 ACRS meeting? What is the purpose and justification for this self-audit? Who will pay for it?
2. What plans have been made toward an independent design and construction audit at Midland?
3. What contacts have been established thus far with various firms concerning the design and construction audit?
4. Provide names and addresses of all firms considered for performing the independent design and construction audit.
5. What criteria are being used to select the firm for the independent design and construction audit--what are the job requirements.
6. Explain in detail the job description, scope of the audit, and other descriptions of what exactly is to be done during this audit.

7. Provide all documents and correspondence exchanged thus far between CPC and prospective companies or individuals regarding the design and construction audit.
8. Explain to what extent the audit scope, depth, or methodology will be controlled by CPC.
9. Explain CPC's proposed plan of action for responding to audit findings.
10. When does CPC expect the selection of this audit firm to be decided?
11. When does CPC expect the audit to begin? To be concluded?
12. How is it possible for an outside auditor to independently assess the structural adequacy of the containment structures and other structures (due to the missing reinforcing bars) without relying upon CPC's statements and analysis of internal wall conditions?

ADDITIONAL QA INTERROGATORIES

9. The Midland Daily News (8/26/82) reported a Suit against Bechtel by Ronald Corto charging job loss due to QA reporting. Why were coreholes being drilled into structures--name all structures into which coreholes were drilled? Provide documents related to QA procedures for this drilling and to the Corto allegations.

Respectfully Submitted,

*Barbara Stamiris*

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cc. ASLB members  
W. Paton, NRC  
NRC Secretary