

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of
Consumers Power Co.
Midland Plant Units 1 & 2

Deskset Nos. 50-329 QM
50-330 QM
50-329 OL
50-330 OL

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

INTERVENOR REQUESTS OF CONSUMERS POWER COMPANY 1/14/81

In accordance with 10 CFR 2.740b and 2.741, Intervenor Barbara Stamiris serves on Consumers Power Co. the following interrogatories and document requests:

(Instructions and definitions as stated in 12/4/80 request)

1. NRC Inspection Report 50-329/330 78-12 notes "Other Activities to be Planned (1) Possible core borings in cooling pond dike area to verify integrity of dikes." Provide documents as a basis for this statement and relating to the decision on this matter as it was first considered.
2. Were any audits conducted covering soil settlement matters (including QA QC aspects) which have not been presented to the NRC? If so, provide these findings.
3. How much time is allotted in the most recent completion schedule for remediation of soil settlement matters and for responses to NRC testing and boring requests?
4. When was the Administration Building begun? What was the means of regarding settlement for the Administration Building and when was that means established?

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5. Provide the Bechtel reports as to the cause of the Administration Building settlement and whether it was an isolated problem, or any other reports recommending procedural changes stemming from this event.

6. Describe the Established Foundation Data Survey Program for the Diesel Generator Building. When was it established, and by whom?

7. Were any settlements noted formally or informally prior to July 1978 for the diesel generator building? If so provide these observations.

8. When was Dr. Peck or any other soil settlement consultant first told of the settlement of the Administration Building? Provide any documents recording discussion of the Administration Building with soil settlement consultants.

9. When was the NRC first informed of the settlement of the Administration Building? Relate the circumstances of this initial disclosure.

10. Amendment 3 to the PSAR eliminated the original site dewatering plan. Provide documents relevant to this decision.

11. At the July 29, 1980 Caseload Forecast Panel Meeting in Midland, mention was made of C.P.Co. loans to Bechtel and other subcontractors in the interest of staying on schedule. Describe the extent of these loans and the circumstances surrounding them.

12. Were there any established requirements regarding groundwater elevations and their effects on plant foundations and structures in 1978? If so provide these documents.

13. What work has been done since April 1980 on the Diesel Generator Building? What percent complete is the building now?

14. What procedure or system is followed to record or correct peer employee performance by Bechtel or C.P.Co.? Have any employees with jobs relating to soil settlement matters been fired or received some type of warning related to job performance? If so provide these records.

15. On page 26 of NRC Inspection Report 50-329/330 78-20, mention is made of the QC inspector who was primarily responsible for the plant fill work who is no longer employed by Bechtel. Provide the name of this individual, his position, and the dates of his employment, and forwarding address.

16. Provide the names and addresses of any other QA or QC personnel with jobs relating to soil settlement from 1975-1980 who are no longer employed by Bechtel or C.P. Co.

Barbara Stamiris

*cc. Alan Farnell, C.P. Co. Counsel
Wm. Paton, NRC. Counsel
Chairman Bechoeffler, ASLB.*

RELATED CORRESPONDENCE



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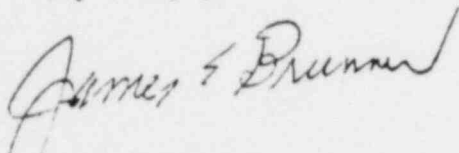
January 23, 1981

Ms Barbara Stamiris
5795 North River Road
Route 3
Freeland, MI 48263

Dear Ms Stamiris:

Attached is a copy of an Affidavit of Sherif Afifi, which, due to mailing delays, was not included with the interrogatory answer previously submitted.

Very truly yours,


James E Brunner

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD



In the Matter of)
CONSUMERS POWER COMPANY)
)
)
(Midland, Units 1 and 2))
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_____)

DOCKET NOS. 50-329-OM
50-330-OM
50-329-OL
50-329-OL

AFFIDAVIT OF SHERIF AFIFI

Sherif Afifi, being duly sworn, deposes and says that he is employed by Bechtel Associates Professional Corporation, as an Engineering Supervisor; that he is jointly responsible with Neal Swanburg for providing answers to Barbara Stamiris' Interrogatories to Consumers Power Company Number 2-3; and that to the best of his knowledge and belief the above information and the answers to the above interrogatories are true and correct.

Sherif Afifi

Sherif Afifi

Subscribed and sworn to before me this 21 day of January, 1981.

Barbara A. Stamiris

Notary Public, Washtenaw Co. Michigan

My Commission Expires: January 21, 1982

NOTARY PUBLIC
BARBARA A. STAMIRIS
1000 W. WASHINGTON ST., ANN ARBOR, MICH. 48106

CERTIFICATE OF SERVICE

James E Brunner hereby certifies that he served a copy of the Affidavit of Sherif Afifi pertaining to answers submitted to Barbara Stamiris Interrogatories, by placing a copy of same in the mail, first class postage prepaid, addressed to the following:

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US Nuclear Regulatory Commission
Washington, DC 20555

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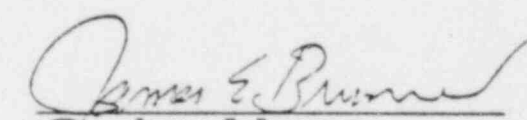
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Sharon K Warren
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Midland, MI 48640

Dated: January 23, 1981


James E Brunner