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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
DUKE POWER COMPANY, <u>et al.</u>	)	Docket Nos. 50-413
	)	50-414
(Catawba Nuclear Station,	)	March 16, 1983
Units 1 and 2)	)	

PALMETTO ALLIANCE FOLLOW-UP INTERROGATORIES  
AND REQUESTS TO PRODUCE TO APPLICANTS

Pursuant to 10 CFR Sections 2.740b, 2.741 and the Board's Orders of December 22, 1982 and March 10, 1983 Intervenor Palmetto Alliance hereby serves these Follow-up Interrogatories and Requests to Produce upon the Applicants regarding Palmetto Alliance Contentions 6, 7, 8, 16, 27 and 44.

Each interrogatory shall be answered fully in writing, under oath or affirmation, and shall include all pertinent information known to the Applicants including their officers, directors, employees, agents, advisors or counsel. In answering each interrogatory and in responding to each request, please recite the interrogatory or request preceeding each answer or response. Also, please identify the person providing each answer or response.

These interrogatories and requests shall be continuing in nature. Thus, any time information is obtained which renders any previous response incorrect or indicates that a response was incorrect when made, a supplement should be made to the previous response to the appropriate interrogatory or request to produce. Supplements should be made to the responses as necessary with

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respect to identification of each person expected to be called at the hearing as an expert witness, the subject matter of his or her testimony, and the substance of that testimony. Intervenor is particularly interested in the names and areas of expertise of witnesses, if any. Each identification of such witnesses is necessary if Intervenor is to be afforded adequate time to depose them.

The term "documents" shall include any writings, drawings, graphs, charts, photographs, and other data compilations from which information can be obtained. We request that at a date or dates to be agreed upon, you make available for inspection and copying, all documents subject to the requests set forth below.

#### REQUESTS TO PRODUCE

Pursuant to 10 CFR Sections 2.741, Intervenor requests you to make available for inspection and copying at a time and location to be designated, any and all documents, of whatsoever description, identified in the responses to these interrogatories, below; including, but not limited to:

- (1) any written record of any oral communication between or among Applicants, their advisors, consultants, agents, attorneys, and/or any other persons, including but not limited to the NRC Staff, the Intervenors, and their advisors, consultants, agents, attorneys and/or any other persons; and
- (2) any documents, correspondence, letter, memorandum, notes, diagrams, reports, charts, photographs, or any

other writing or whatsoever description, including but not limited to work papers, prior drafts, and notes of meetings.

If you maintain some documents should not be made available for inspection, you should specify the documents and explain why such are not being made available. This request extends to any such document, described above, in the possession of Applicants and their advisors, consultants, agents, or attorneys.

#### INTERROGATORIES

Pursuant to 10 CFR Sections 2.740b, Intervenor requests Applicants by and through its attorney, to answer separately and fully in writing under oath or affirmation, by persons having knowledge of the information requested, the following interrogatories.

#### CONTENTION 6

By way of introduction Intervenor notes that with respect to a large number of earlier interrogatories on this contention Applicants have asserted that responsive answers are contained in voluminous records of Duke Power Company, some of which have been made available for inspection at the Company's offices in Charlotte, North Carolina. Intervenor's counsel and members have visited the Company's offices on two occasions since February 15, 1982, to conduct such an inspection but have been unable to physically inspect all of the materials made available. Intervenor has contracted with Applicants to photocopy selected documents but due to its limited financial resources and the volume

of materials involved it has been unable to obtain copies of documents claimed by Applicants to contain answers to its earlier interrogatories for detailed examination and analysis.

Further, with respect to Interrogatories 23 and 25 on this contention served April 20, 1982, and required to be answered over Applicants' objection by Board Order of February 9, 1983, at p. 5, Applicants have so far only identified and made available documents reflecting disagreements, disputes, or differences of opinion between Quality Assurance Inspectors and their supervisors, "which have not been resolved as between the supervisor and the inspector...and complaints known to Duke Power Company management." Applicants' Supplemental Responses, February 28, 1983, at p. 29. Counsel for Applicants have agreed that substantial information and documentation responsive to these interrogatories may remain to be identified and produced reflecting matters between Inspectors and "first line" supervision or otherwise not brought to the attention of Duke management. Applicants have agreed to make this further information available and to respond to follow-up interrogatories regarding this information.

1. Other than by documents or materials protected from disclosure to Intervenor under the attorney "work product" or attorney-client privileges, is the factual basis for your position on this contention reflected in conversations, consultations, correspondence or any other type of communications with one or more individuals?

If so:

- a. Identify by name and address each such individual.
  - b. State the educational and professional background of each individual, including occupation and institutional affiliations.
  - c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
  - d. Describe the information received from such individuals.
  - e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence, or other communication with such individual.
2. Identify each deficiency in plant construction reflecting faulty workmanship or deficiency in plant design change control as defined in 10 CFR Section 50.55(e) and for each indicate: the classification of its significance (i.e. classified under which subsections, 50.55(e)(i)(i - iv); the 10 CFR Part 50 Appendix A General Design Criteria to which each relates and the respects in which it reflects noncompliance; the report number, and date, if any; the names, titles, addresses, and telephone numbers of each person responsible for the deficiency, its discovery, its reporting, and its corrective action; a detailed description of the deficiency and its safety implications; a detailed description of its corrective action.

3. For each activity under license by NRC or AEC conducted by Duke Power Company or its contractors and subcontractors involving any nuclear facility, including but not limited to Catawba, identify each deficiency, as defined in 10 CFR Section 50.55(e), which reflects faulty workmanship in construction or deficiency in design change control, and which represents a significant breakdown in any portion of the Quality Assurance program conducted in accordance with the requirements of Appendix B to 10 CFR Part 50; identify the Appendix B criteria to which it relates; describe in detail the respects in which the deficiency reflects a noncompliance with the requirements of Appendix B criteria; the 10 CFR Part 50 Appendix A General Design Criteria to which each relates, if any, and the respects in which it reflects noncompliance; the report number and date, if any; the names, titles, addresses and telephone numbers of each person responsible for the deficiency, its discovery, its reporting, and its corrective action; a detailed description of the deficiency and its safety implication; a detailed description of its corrective action.
4. Identify all audits conducted pursuant to 10 CFR Part 50 Appendix B Criterion XVIII which reflected systematic deficiencies in plant construction involving faulty workmanship or design change control or which reflected approval of faulty workmanship; for each indicate: the nature



of the deficiency, the Appendix B criteria to which it relates and the respects in which noncompliance is reflected; the date and other identifying information of the audit documentation; the names, titles, addresses and telephone numbers of each person responsible for the deficiency, the performance of the audit, the management review of the results, and its corrective action; a detailed description of the deficiency and its safety implications; a detailed description of its corrective action.

5. Identify each person formerly employed at the facility in or responsible for the Quality Assurance and Quality Control programs and involuntarily terminated for reasons related to deficiencies in the performance of their quality assurance or quality control duties. For each such person provide the name, title, address, phone number, dates of employment and a detailed description of the circumstances of termination.
6. From the time of commencement of construction at Catawba until the present identify those persons employed by Duke Power Company principally responsible for the development, management and implementation of the Company's Quality Assurance program related to nuclear plant construction and the implementation of such program at Catawba. For each person please set forth his or her name, title, dates of employment in the subject position, present address and telephone number.

7. Identify in detail any complaints known to Applicants made to the NRC regarding faulty workmanship in construction, design change control, or pressure to approve faulty workmanship at Catawba. For each such complaint please set forth the name, address and telephone number of the persons complaining or involved in the matter complained of and explain fully the manner in which Applicants learned of the complaint.
8. With respect to the Catawba Welding Task Force Report and the underlying circumstances involved therein as referred to in answer to a previous interrogatory at pp. 33-34 of Applicants' February 28, 1983, Supplemental Responses please set forth the names, titles, dates of employment, current addresses and telephone numbers of each of the subject Catawba QA Welding Inspectors, members of the Welding Inspector Task Force, all responsible consultant personnel participating in the investigation or in advising Applicants, and all persons interviewed in the course of the Task Force effort.
9. With respect to the Catawba Welding Task Force referred to above, please identify any and all documents, tapes, notes or memoranda reflecting the circumstances and manner in which Applicants learned of the "dissatisfaction" among the welding inspectors, formulated the response to such "dissatisfaction", implemented the response planned, and followed up with corrective action, including any and



all communications to and from management, to and from the consultants, members of the Task Force, and the subject inspectors, including but not limited to the records of all interviews by the consultants and Task Force members.

CONTENTION 7

1. For each instance of noncompliance with NRC operating and administrative procedures or violation of NRC rules or regulations by Applicants which became known to senior management of Duke Power Company, identify in detail the circumstances involved including the nature of the problem and its resolution, the actions taken by senior management, the names, titles, dates of employment, addresses and telephone numbers of the senior management personnel involved, and any and all documents, notes or memoranda reflecting such involvement by senior management personnel.
2. Other than by documents or materials protected from disclosure to Intervenor under the attorney "work product" or attorney-client privileges, is the factual basis for your position on this contention reflected in conversations, consultations, correspondence or any other type of communications with one or more individuals?

If so:

- a. Identify by name and address each such individual.
- b. State the educational and professional background of each individual, including occupation and institutional affiliations.
- c. Describe the nature of each communication with such individual, when it occurred, and identify all other individuals involved.
- d. Describe the information received from such individuals.

- e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence, or other communication with such individual.

CONTENTION 8

1. Describe in detail the "significant differences between McGuire and Catawba control boards, system design, and operating procedures" referred to in the January 31, 1983, letter from Hal B. Tucker, Duke Power Company, to NRC, and the differences and similarities in the McGuire simulator and Catawba. Please identify any documents reflecting these similarities and differences.
2. Identify in detail each and every test used or to be used in qualifying reactor operator applicants at Catawba, including but not limited to the pre-employment "validated testing program", "interviews", "physical examinations", "Thurstone Temperament Test", "Minnesota Multi-Phasic Personality Inventory", "NRC Reactor Operator Examination", "NRC license physical examinations", and "pre-operational testing" referred to in answer to earlier interrogatories at pp. 46 and 47 of Applicants' Supplemental Responses. Provide copies of each test and all test results, coded as appropriate to protect individual privacy.

CONTENTION 16

1. Describe in detail any and all measures to be employed at Catawba to prevent or mitigate damage to stored spent fuel from an accidental or intentional spent fuel cask drop into the spent fuel pool. Identify any documents reflecting such measures.
2. Describe in detail any and all measures to be employed at Catawba to prevent or mitigate intentional or accidental premature unshielded removal of a spent fuel cask lid. Identify any documents reflecting such measures.
3. How much time would transpire after total loss of function of the Catawba spent fuel pool heat removal system until boil off of sufficient pool water to expose the tops of stored spent fuel elements? Thereafter, until the initiation of fuel cladding/steam reaction? Please describe in detail the basis for your answer.
4. What if any measures are planned at Catawba to mitigate hydrogen gas generation and combustion in the spent fuel pool? Please describe in detail.
5. Describe in detail each and every instance in which boron concentrations have fallen below 2,000 parts per million at any Duke operating facilities. Please set forth the date, facility name, cause and corrective action taken, if any, and identification of any document reflecting such occurrences.

CONTENTION 27

1. Identify in detail each and every potential accidental release point for airborne radioactivity from Catawba. Describe in detail the monitoring equipment and procedures for each such potential release point.
2. Describe system redundancy features, if any, in the installed effluent monitoring systems. In the absence of redundant features, what measures are planned to assure timely protective action in the event of an unmonitored accidental release of radiation?
3. Describe in detail the factual basis for concluding that use of mobile monitoring teams will assure adequate and timely protective action for affected populations. Please identify any and all studies, communications or documents reflecting such factual basis.
4. Do Applicants plan to employ aircraft in post accident environmental monitoring? If so, please identify such plans in detail.
5. Do Applicants agree with the answers given by NRC Staff in response to earlier Interrogatories 18 and 22 on Contention 27, NRC Staff Responses, dated 10/19/82, at pp. 28, 29 and 30, respectively. If not, please explain.
6. Other than by documents or materials protected from disclosure to Intervenor under the attorney "work product" or attorney-client privileges, is the factual basis for your position on this contention reflected in conversations, consultations, correspondence or any other type of commu-



nications with one or more individuals?

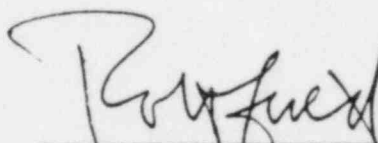
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- d. Describe the information received from such individuals.
- e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence, or other communication with such individual.

CONTENTION 44

1. Please describe in detail the reference temperature,  $RT_{NDT}$ , values, by year, originally predicted to be experienced at Oconee.
2. Please explain in detail why the actual  $RT_{NDT}$  values experienced at Oconee deviated, if they did, from the originally predicted values. Identify any and all empirical data supporting your explanation and any documents reflecting such data.
3. Has Duke Power Company supported or participated in efforts, such as those by EPRI, to evaluate possible remedial actions to be taken in response to premature reactor vessel embrittlement? Please explain.
4. Has Duke reviewed such possible remedial actions for use at any of its facilities? If so, please explain the details of such review and its results.
5. Other than by documents or material protected from disclosure to Intervenor under the attorney "work product" or attorney-client privileges, is the factual basis for your position on this contention reflected in conversations, consultations, correspondence or any other type of communications with one or more individuals?  
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- e. Identify each letter, memorandum, tape, note or other record related to each conversation, consultation, correspondence, or other communication with such individual.

March 16, 1983



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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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DUKE POWER COMPANY, et al. )  
)  
(Catawba Nuclear Station, ) March 17 1983  
Units 1 and 2) )

CERTIFICATE OF SERVICE

I hereby certify that copies of PALMETTO ALLIANCE  
FOLLOW-UP INTERROGATORIES AND REQUESTS TO PRODUCE TO APP-  
LICANTS have been served upon Applicants Counsel by Express  
Mail on March 16, 1983 and have served copies upon the  
following by depositing same in the U.S. Mail, postage prepaid,  
on this 17th day of March, 1983.

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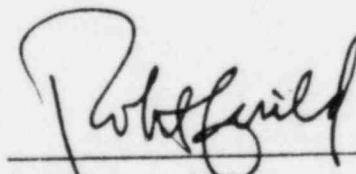
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