

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

'84 FEB -2 P12:10

Before the Atomic Safety and Licensing Board

In the Matter of :
Public Service Electric and : Docket No. 50-354 OL
Gas Company :
(Hope Creek Generating Station) :

PUBLIC ADVOCATE'S FIRST SET OF
INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS TO THE
APPLICANTS

Pursuant to the rules of practice of the Nuclear
Regulatory Commission ("NRC"), 10 C.F.R. §2.740(b), and
the Order of the Atomic Safety and Licensing Board of
December 21, 1983 and the special prehearing conference
of November 22, 1983, the Public Advocate of New Jersey,
Joseph H. Rodriguez ("Public Advocate") hereby propounds
the following interrogatories to the applicants, Public
Service Electric and Gas Company, et al., ("Applicant"
or "PSE&G") which are to be answered accurately and
fully in writing and under oath in accordance with
the definitions and instructions below.

8402060148 840202
PDR ADDCK 05000354
G PDR

D503

Additionally, pursuant to 10 C.F.R. §2.741, the Public Advocate requests that the applicant provide copies of all documents, reports, studies, or other written material referenced or utilized by the Applicant in responding to these Interrogatories.

Definitions and Instructions

1. For each question, please identify each person providing information or assistance for the answer, providing the full name, title or position, and business address.

2. Definition: The Public Advocate relies on the same definitions provided by the Applicants in their Interrogatories propounded upon the Public Advocate (dated January 20, 1984), along with the following:

a. "Applicants" means Public Service Electric and Gas Company and Atlantic Electric Company, or any official, employee, or consultant currently or formerly employed by either of the two applicant companies or any subsidiary, related, or independent company contractually obligated to the applicant, currently or formerly.

3. The Public Advocate requests all knowledge

and information in the Applicant's possession and/or knowledge and information in the possession of the Applicant's agents, representatives, consultants, and unless privileged, attorneys.

Contention 1: Pipe
 Cracks

1. Specify each section of the Hope Creek Final Safety Analysis Report ("FSAR"), including Applicant's response to staff questions, and any amendments or updates thereof which Applicants assert are applicable to the consideration of the Public Advocate's Contention.

2. Identify and specify all meetings, conferences, studies, reports, or other documentation relied upon by Applicants in considering the problem of "intergranular stress corrosion cracking ("IGSCC"). Provide copies of all such materials together with transcripts, minutes or notes taken during any meeting, proceedings, or other discussions related to the Applicant's response to the phenomenon of IGSCC.

3. Identify all persons, officials, or consultants now or formerly employed by PSE&G to advise the Applicants on the phenomenon of IGSCC. Provide

copies of any reports, studies, or correspondence wherein these persons describe, analyze, or offer recommendations upon IGSCC.

4. Specify and describe in detail any mitigation measures, plans, or programs developed or under consideration by the Applicants for the prevention and/or mitigation of IGSCC.

5. Identify any experts, employees, or consultants of the Applicants that have advised or in the future will advise the company on IGSCC, and/or will testify for the Applicants in hearings on this contention. Provide copies of their resumes and work product.

6. Identify and describe any and all "non-conformance reports" ("NR"), surveillance reports ("SR"), or other reports provided by contractors, subcontractors, inspectors, or other personnel associated with the purchase, delivery, installation and welding of piping at Hope Creek.

7. Identify all inspectors currently or formerly employed by the Applicants to examine Type 304 stainless steel piping or any other form of piping which carries coolant water.

8. Identify the location of all NR's, SR's, or other inspection reports specified in Interrogatory 6 , supra.

Contention 2: Management
Qualification

1. Provide a table of organization, showing the chain of communication and command, which the Applicants employ to manage the operation of nuclear plants.

2. Identify all persons, employees, officials, or consultants currently or formerly employed by the Applicants who reviewed and/or participated in the Applicants' response to the ATWS incidents at the Salem Nuclear Generating Station in February, 1983. Provide copies of all reports, studies, recommendations, correspondence or other material which sets forth their analysis and/or recommendations regarding the Salem ATWS.

3. Identify and describe the Applicant's program for management of the operation and maintenance of the Hope Creek Nuclear Generating Station. Include the names and qualifications of all personnel in a management capacity and with authority to operate or oversee the operation of the Hope Creek Generating Station.

4. Describe any and all operational and/or management changes instituted by the Applicants at the Salem Generating Station following the ATWS of February, 1983. Identify and describe any way in which these changes will be applied to Hope Creek.

Contention 3: Environmental
Qualification

1. Specify all sections of the Applicant's FSAR and any response to staff requests for information which the Applicants assert provide adequate information for the NRC to determine that safety related electrical and mechanical equipment are environmentally qualified at the Hope Creek Station.

2. Identify any and all persons, officials, employees or consultants with responsibility, currently or formerly for the Applicant's program of environmentally qualifying safety related electrical and mechanical equipment.

3. Identify any and all reports, studies which the Applicants assert show the environmental qualification of safety related electrical and mechanical equipment at Hope Creek. In particular, identify all reports, including NR's, SR's, and other documentation in the possession of the Applicants which relate to environmental qualification.

4. Identify and describe any studies, reports, or other documentation prepared by persons or agencies not under the control or direction of the Applicants, which the Applicants have used or relied upon in qualifying safety related electrical and mechanical equipment.

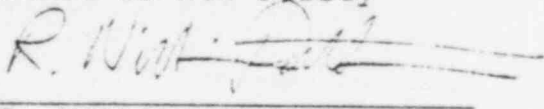
Request for Documents Production

Please attach to your answers to the above interrogatories a copy of all reports or other documents applicable to your answers, or upon which you otherwise intend to rely in the presentation of your direct case or in the examination of witnesses. Thank you for your prompt attention to the Public Advocate's first interrogatories. Should you have any difficulty in responding to the above questions, please do not hesitate to call me.

Respectfully submitted,

JOSEPH H. RODRIGUEZ
Public Advocate of the
State of New Jersey

By:


R. WILLIAM POTTER
Assistant Public Advocate of
the State of New Jersey

Dated: January 30, 1984

UNITES STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of :
Public Service Electric and : Docket No. 50-354 OL
Gas Company :
(Hope Creek Generating Station) :

CERTIFICATE OF SERVICE

I hereby certify that copies of the Public Advocate's First Set of Interrogatories and Request for Production of Documents to the Applicants, dated January 30, 1984 in the captioned matter have been served upon the following by deposit in the United States mail on this 30th day of January, 1984:

The Hon. Marshall E. Miller *
Chairman
Atomic Safety and Licensing
Board Panel
United States Nuclear Regulatory
Commission
East-West West Building
4350 East-West Highway, Room 408
Bethesda, Maryland 20814
(2 copies)

Dr. Peter A. Morris
Atomic Safety and Licensing
Board Panel
United States Nuclear
Regulatory Commission
1717 "H" Street, N.W.
Washington, DC 20555

Dr. James H. Carpenter
Atomic Safety and Licensing
Board Panel
United States Nuclear
Regulatory Commission
1717 "H" Street, N.W.
Washington, DC 20555

Theodore Granger, Esq.
Dept of the Public Advocate
Division of Rate Counsel
744 Broad Street -
29th and 30th floors
Newark, NJ

Atomic Safety and Licensing
Board Panel
United States Nuclear
Regulatory Commission
1717 "H" Street, N.W.
Washington, DC 20555

Atomic Safety and Licensing
Appeal Panel
United States Nuclear
Regulatory Commission
1717 "H" Street, N.W.
Washington, DC 20555
(5 copies)

*Sent by Federal Express

Docketing and Service Station
Office of the Secretary
United States Nuclear
Regulatory Commission
1717 "H" Street, N.W.
Washington, DC 20555

Lee Scott Dewey, Esq. *
Office of the Executive
Legal Director
U.S. Nuclear Regulatory
Commission
East-West West Building
4350 East-West Highway
Bethesda, Maryland 20814
(2 copies)

Richard Fryling, Jr., Esq.
Associate General Counsel
Public Service Electric
and Gas Co.
PO BOX 570 (T5E)
Newark, NJ 07101

Director, Division of
Environmental Control
Tatnell Building
Dover, Delaware 19901

Troy B. Conner, Jr., Esq. *
Conner and Wetterhahn
1747 Pennsylvania Avenue, NW
Washington, DC 20006
(2 copies)

Hon. Irwin R. Kimmelman
Attorney General
State of New Jersey
Justice Complex
25 Market Street
Trenton, NJ 08625

Carol Delaney, Esq.
Deputy Attorney General
Department of Justice
State Office Building
8th floor
820 N. French Street
Wilmington, Delaware 19801

R. W. Winkler